

Judicial Council Standing Committee on
Model Utah Civil Jury Instructions

Agenda

September 11, 2023

4:00 to 6:00 p.m.

[Via Webex](#)

Welcome and Approval of July Minutes	Tab 1	Alyson/Lauren
Welcome new Committee member - Stewart Harman, eff. 8/18/23 - and introduction to Committee members		Alyson
Public Comments to CV107A, CV632, CV632A-D		Alyson
Language and Law research proposal	Tab 2	Bill Eggington
CV920-CV925 prescriptive easement draft instructions	Tab 3	Robert Cummings
Comments from Chris Hogle re prescriptive easement draft instructions	Tab 4	Robert Cummings
CV132A Out-of-State Witnesses draft instruction	Tab 5	John Macfarlane
Progress on Instruction Topics	Tab 6	(Informational)

[Committee Web Page](#)

[Published Instructions](#)

Meeting Schedule: Monthly on the 2nd Monday at 4 pm

Next meeting: October ??, 2023

TAB 1

MINUTES

Advisory Committee on Model Civil Jury Instructions

July 10, 2023

4:00 p.m.

Present: Judge Kent Holmberg, Judge Keith A. Kelly, Lauren A. Shurman, Alyson McAllister, Douglas G. Mortensen, William Eggington, Mark Morris, John Macfarlane, Michael D. Lichfield, Adam D. Wentz, Jace Willard.

Also present:

Excused: Ricky Shelton

1. *Welcome*

Alyson McAllister welcomed the Committee.

2. *Approval of Minutes.*

May meeting minutes approved with Jace Willard's corrections.

3. *CV632 Threshold/Minimum Injury Requirements*

- Reviewed changes to the instruction made in prior meetings.
- Michael Lichfield suggested that the language "based on something other than [plaintiff's] own testimony..." located within CV632D, "Objective Findings," is not a complete definition. His concern was that the language did not fully capture the fact that the finding must be based on externally verifiable evidence, supported by something other than the plaintiff's own subjective testimony, as outlined by precedent.
- The Committee agreed and drafted new language to capture this complete definition. ("...based on externally verifiable evidence; that is, the finding must be based on something other than plaintiff's own subjective testimony.")
- The committee also removed the final clause of CV632D, "such as testimony of an expert of [plaintiff's] treating physician" and instead included it in a Committee Note.
- Motion to adopt CV632 and subsequent definitions, CV632A through CV632D, was unanimously approved.

4. *CV930 Easement by Necessity. Introduction.*

- This instruction was discussed and revised during a prior meeting, but the Committee did not have a quorum to vote on the same.

- Mark Morris questioned whether an easement by necessity must include a public highway specifically. If not, he suggested that the Committee modify the bracketed language “public highway.”
- The Committee considered the precedent and relevant statute and determined that “public highway” is likely too narrow a definition. It agreed to change the bracketed language to “public road” instead.
- Ms. McAllister suggested including a Committee Note providing further explanation regarding public road. The Committee drafted a note: “The term ‘public road’ is meant to be illustrative only and it may be appropriate to replace it with a more specific description in a given case.”
- Motion to adopt CV930 was unanimously approved.

5. *CV931 Easement by Necessity. Elements of a claim for access to landlocked property.*

- This instruction was discussed and revised during a prior meeting, but the Committee did not have a quorum to vote on the same.
- Ms. Sherman suggested the removal of the word “that” at the beginning of paragraph (2). The Committee agreed.
- Motion to adopt CV931 was unanimously approved.

6. *CV940 Easement by Implication. Introduction.*

- This instruction was discussed and revised during a prior meeting, but the Committee did not have a quorum to vote on the same.
- Ms. McAllister suggested placing brackets around the terms “Parcel A” and “Parcel B” to allow for inserting specific parcel identifiers on a case-by-case basis. Committee agreed.
- Bill Eggington questioned whether the term “apparent” is easily understood language. The Committee debated whether to change it to “obvious.” The precedent from the Utah Supreme Court and Utah Court of Appeals was unhelpful as it was inconsistent. It sometimes used “apparent **or** visible” and other times “apparent, obvious **and** visible.” The Committee determined to make a Committee Note identifying the discrepancy.
- Motion to adopt CV940 was unanimously approved.

7. *CV941 Easement by Implication. Elements.*

- This instruction was discussed and revised during a prior meeting, but the Committee did not have a quorum to vote on the same.
- The Committee Note to CV940 regarding “apparent and/or visible” was added to CV941 as it was equally relevant.

- Additional case citation was added.
- Motion to adopt CV941 was unanimously approved.

8. *Bill Eggington gave linguistic presentation on the term “reasonable.”*

The meeting concluded at 5:52 PM.

TAB 2

TO: Alyson McAllister, Chair, MUJI Committee – Civil
FROM: Jesse Egbert (NAU), Scott Jarvis (NAU), Clark Cunningham (GSU), and William Eggington (BYU Emeritus)
DATE: August 9, 2023
RE: Proposed partnership

We are faculty at Northern Arizona University and Georgia State University who, along with Dr. William Eggington, conduct research on language and law. We are aware of your committee's exemplary work on jury instructions and are interested in partnering with you on research projects dealing with the development of accessible jury instructions. . We have several resources we can offer including expertise in multi-method approaches to investigating plain language, clarity, and comprehensibility. We have the time, funding, and research staff to begin carrying out pilot research on the comprehensibility of Utah Jury Instructions by lay people. If the results of this initial research seem promising, we could pursue a joint proposal for funding from a program such as the Project Grants from the State Justice Institute (<https://www.sji.gov/grants/project-grants/>). We are interested in partnering with you for several reasons:

1. Unlike many states, Utah has court-approved committees that draft model instructions through a public, transparent process.
2. Rule 3-418 of the Utah Code of Judicial Administration specifically directs the committees on Model Utah Jury Instructions (MUJI) to “develop jury instructions that are accurate statements of Utah law using simple structure and, where possible, words of ordinary meaning.”¹
3. The published Model Utah Jury Instructions show commitment to this directive in the opening words of the introduction: “An accurate statement of the law is critical to instructing the jury, but accuracy is meaningless if the statement is not understood, or is misunderstood, by jurors.” The introduction goes on to identify the task as “to further the jurors' understanding of the law and their responsibilities though accuracy, clarity, and simplicity.”²
4. The MUJI Home Page directs judges to a six-page document that provides 44 different “Plain-Language Drafting Guidelines,” stating such principles as “Be clear” and “Remember who your audience is (lay people, with varying degrees of education and language skills)”³
5. Both the Civil and Criminal MUJI committees include a member with an academic background in linguistics.

¹ See **Introduction to the Model Utah Jury Instructions, Second Edition**. <https://legacy.utcourts.gov/muji/>.

² Id.

³ <https://legacy.utcourts.gov/committees/muji/guideline%20summary.pdf>

We recognize how difficult it is to draft instructions that meet plain language requirements while maintaining established and codified legal interpretations that will satisfy all parties in a legal dispute as well as a potential appellate court. Given your experience with this challenge and your commitment to making jury instructions comprehensible to lay people, we would like to work with you to develop and validate a language assessment methodology designed for the specific purpose of measuring how and to what extent lay people understand the words and grammar of designated MUJI Committee instructions. Our proposed method would initially use corpus linguistics (analysis of large data sets of naturally occurring language) to identify words and grammatical structures that are likely to promote the comprehensibility of jury instructions while retaining legal accuracy. A subsequent step would be to design experiments to present jury instructions (original and modified) to lay people in different modes (oral only, written only, written and oral) to measure the effect of mode (and modification) on comprehensibility.

One way we could assist you would be to focus on jury instructions that are on the committee's agenda for possible revision. We could, for example, assess a conventional instruction against the committee's proposed revision that aims for improved comprehensibility. The results of the assessment could provide empirical validation of the value of the committee's revision efforts. The assessment could also reveal which aspects of revision (e.g., plain language vocabulary, simplified syntax) yield the greatest benefits in terms of comprehensibility. This assessment could guide the committee toward further improvement of the draft revision.

These are some of the ways we believe that a partnership may be beneficial to you, but we would of course like to hear from you what types of research support you desire and believe would be beneficial. Please let us know whether you would be interested in discussing these ideas with us in an online meeting in coming weeks. Our schedules are fairly flexible between August 10th and 15th, and we can also arrange to meet on other days, as well.

We look forward to hearing from you.

Sincerely,

Jesse Egbert, Associate Professor of Applied Linguistics, Northern Arizona University
Scott Jarvis, Professor of Applied Linguistics, Northern Arizona University
Clark Cunningham, Professor of Law, Georgia State University
William Eggington, Professor Emeritus, Brigham Young University

TAB 3

CV920 “Easement” Defined.

An “easement” is a right to use or control land owned by another person for a specific limited purpose (such as to cross it for access [or insert other example]). An easement prohibits the landowner from interfering with the uses authorized by the easement.

[An express easement is an easement that the landowner grants to someone else in writing, such as in a contract or a deed.]

References

Black’s Law Dictionary (Abridged 7th ed.).

Committee Notes

The parties may include in the parenthetical a description of additional or other particular uses more specific to the facts of the case. Depending on the easement at issue, the easement may include an area above or below the surface of the land.

If there are additional types of easements, the jury may be instructed according to the particular easement. By including these instructions, the Committee does not intend to take a position on the question of whether a right to a jury trial exists for any particular easement claim.

CV921 Prescriptive Easement. Introduction.

A prescriptive easement is a legal right to continue to use property of another based on longstanding use.

References

Valcarce v. Fitzgerald, 961 P.2d 305, 311 (Utah 1998) (prescriptive easement).

CV9221 Prescriptive Easement. Elements of a claim.

[Plaintiff] claims a prescriptive easement to continue to use [Defendant’s] property in the following manner: [describe the particular use]. To establish this prescriptive easement, [Plaintiff] must prove by clear and convincing evidence each of the following elements:

1. That [Plaintiff] has been using [Defendant’s] property for [describe the particular use];
2. That [Plaintiff’s] use of [Defendant’s] property in this manner was open and notorious;
3. That [Plaintiff’s] use of [Defendant’s] property in this manner was adverse; and

4. That [Plaintiff] continuously used [Defendant's] property in this manner for at least 20 years.

If you find that [Plaintiff] has proved each of these elements by clear and convincing evidence, then [Plaintiff] is entitled to a prescriptive easement to continue using [Defendant's] property for [describe the particular use].

References

Judd v. Bowen, 2017 UT App 56, ¶ 10, 397 P.3d 686, 692.
Valcarce v. Fitzgerald, 961 P.2d 305, 311 (Utah 1998).

CV9232 Prescriptive Easement. "Open and Notorious" Defined.

[Plaintiff's] use of [Defendant's] property was "open and notorious" if [Defendant] knew about the use, or if [Defendant] could have learned about the use through the exercise of reasonable diligence.

References

Judd v. Bowen, 2017 UT App 56, ¶ 22, 397 P.3d 686, 694.
Lunt v. Kitchens, 260 P.2d 535, 537 (Utah 1953).
Jensen v. Gerrard, 39 P.2d 1070, 1072 (1935).

CV9243 Prescriptive Easement. "Adverse" Defined.

[Plaintiff's] use of [Defendant's] property was "adverse" if [Plaintiff] did not obtain permission for the use.

If you find [Plaintiff's] open and notorious use of [Defendant's] property continued for a period of twenty years, then you must presume that the use was adverse unless [Defendant] rebutts this presumption, such as by proving that the use was permissive when the use first began or became permissive at some time during the twenty-year period. ~~proves that [Defendant] [or a previous owner of [Defendant's] property] gave permission to [Plaintiff] for the use when it first began.~~

References

Harrison v. SPAH Family Ltd., 2020 UT 22, ¶ 51, 466 P.3d 107, 118.
Valcarce v. Fitzgerald, 961 P.2d 305, 311 (Utah 1998).
Zollinger v. Frank, 175 P.2d 714, 716 (Utah 1946).
Jacob v. Bate, 2015 UT App 206, ¶¶ 18-19, 358 P.3d 346, 353.

CV9254 Prescriptive Easement. "Continuous" Defined.

[Plaintiff's] use of [Defendant's] property was continuous if [Plaintiff] used [Defendant's] property as often as required by the nature of the use and [Plaintiff's] needs, for an uninterrupted period of at least twenty years.

A prescriptive use is interrupted where, sometime during the twenty-year period: (1) [Plaintiff] stops using [Defendant's] property; (2) [Defendant] [or a previous owner of [Defendant's] property] prevents [Plaintiff] from using the property; or (3) [Plaintiff] accepts permission from [Defendant] [or a previous owner of [Defendant's] property] to continue using the property.

References

SRB Inv. Co., Ltd v. Spencer, 2020 UT 23, 463 P.3d 654.

Harrison v. SPAH Family Ltd., 2020 UT 22, ¶¶ 41-43, 466 P.3d 107, 116-17.

Valcarce v. Fitzgerald, 961 P.2d 305, 311 (Utah 1998).

Marchant v. Park City, 788 P.2d 520, 524 (Utah 1990).

Lunt v. Kitchens, 260 P.2d 535, 537 (Utah 1953).

Zollinger v. Frank, 175 P.2d 714, 716 (Utah 1946).

Jensen v. Gerrard, 39 P.2d 1070, 1073 (Utah 1935).

M.N.V. Holdings LC v. 200 S. LLC, 2021 UT App 76, ¶¶ 14-15, 494 P.3d 402, 407-08.

Judd v. Bowen, 2017 UT App 56, ¶ 16, 397 P.3d 686, 693.

Jacob v. Bate, 2015 UT App 206, ¶ 27, 358 P.3d 346, 355.

Committee Notes

For the definition of clear and convincing, *see* CV118.

TAB 4

Chris Hogle (at Holland & Hart) questions why the Committee is drafting jury instructions for a prescriptive easement, which is an equitable claim for which there is no right to a jury trial. He submitted a trial court decision so holding.

And (although the draft instructions have not yet been published on the Committee website and public comments have not yet been invited) he submits certain comments to the Committee's draft instructions (previously CV951 and CV953; now CV922 and CV924). With mild edits by Lauren Shurman (and renumbering) to add clarity, his comments are as follows:

Draft [CV922] and [CV924] leave out the "claim of right" requirement. [CV922] cites two cases—*Judd v. Bowen*, 2017 UT App 56, ¶ 10, 397 P.3d 686, and *Valcarce v. Fitzgerald*, 961 P.2d 305, 311 (Utah 1998)—but both include the "claim of right" requirement as separate from the use, open-and-notorious, adverse, and continuous-for-20-years elements:

To attain legal recognition of a prescriptive easement in Utah, the claimant must prove by clear and convincing evidence that the claimant's "use of another's land was open, continuous, and adverse **under a claim of right** for a period of twenty years."

Judd, 2017 UT App 56, ¶ 10 (emphasis added) (*quoting Orton v. Carter*, 970 P.2d 1254, 1258 (Utah 1998)).

A party claiming a prescriptive easement must prove that his use of another's land was open, continuous, and adverse **under a claim of right** for a period of twenty years.

Valcarce, 961 P.2d at 311.

In *Judd v. Bowen*, 2018 UT 47, ¶ 12, 428 P.3d 1082, the Supreme Court held that the Court of Appeals' statement of the elements in *Judd v. Bowen*, 2017 UT App 56 ¶ 10 (including the "claim of right" element) was supported by "well-established caselaw from both this court and the court of appeals identifying the same legal standard."

That portion of the Supreme Court's *Judd* decision was cited in the most recent Utah Supreme Court case that squarely addresses a prescriptive easement claim:

In Utah, a prescriptive easement is established where the "use of another's land was open, continuous, and adverse **under a claim of right** for a period of twenty years."

Harrison v. SPAH Family Ltd., 2020 UT 22, ¶ 12, 466 P.3d 107 (emphasis added) (*quoting Judd*, 2018 UT 47, ¶ 12).

Likewise, [CV924] omits the "claim of right" condition to the presumption of adversity:

If you find [Plaintiff's] open and notorious use of [Defendant's] property continued for a period of twenty years, then you must presume that the use was adverse unless [Defendant] proves that [Defendant] [or a previous owner of [Defendant's] property] gave permission to [Plaintiff] for the use when it first began.

It cites *Harrison* and *Valcarce*, but those cases hold that the presumption is triggered, not merely with open and notorious use for 20 years, but with such use “under a claim of right”:

Where a prescriptive user “has shown an open and continuous use of the land **under claim of right** for the twenty-year prescriptive period, the use will be presumed to have been adverse.”

Harrison, 2020 UT 22, ¶ 51 (emphasis added).

However, once a claimant has shown an open and continuous use of the land **under claim of right** for the twenty-year prescriptive period, the use will be presumed to have been adverse.

Valcarce, 961 P.2d at 311 (emphasis added); see also *Van Denburgh v. Sweeney Land Co.*, 2013 UT App 265, ¶ 3, 315 P.3d 1058 (“[O]nce a claimant has shown an open and continuous use of the land **under claim of right** for the twenty-year prescriptive period, the use will be presumed to have been adverse.” (Emphasis added)).

The draft also cites *Zollinger* (and *Jacob v. Bate*, 2015 UT App 206, ¶¶ 18-19, 358 P.3d 346, 353, which was based on *Zollinger*) which could be read to support the draft:

That is, where a claimant has shown an open and continuous use of the land for the prescriptive period (20 years in Utah) the use will be presumed to have been against the owner. . . .

Zollinger, however, is a 1946 decision that predates the Supreme Court’s more recent pronouncements of the presumption, including in the Supreme Court’s 2020 *Harrison* decision. Also, *Zollinger* was cited in *Valcarce* immediately after the *Valcarce* Court’s articulation of the presumption’s elements, suggesting that the *Valcarce* Court interpreted *Zollinger* to be consistent with the rule that the presumption requires “an open and continuous use of the land **under claim of right** for the twenty-year prescriptive period.” (Emphasis added.)

Suggested edits for [CV922] and [CV924]:

[CV922]

[Plaintiff] claims a prescriptive easement to continue to use [Defendant's] property in the following manner: [describe the particular use]. To establish this prescriptive

easement, [Plaintiff] must prove by clear and convincing evidence that ~~for at least 20 years each of the following elements:~~

1. ~~That~~ [Plaintiff] has been **continuously** using [Defendant's] property for [describe the particular use];
2. ~~That~~ [Plaintiff's] use of [Defendant's] property in this manner was open and notorious;
3. [Plaintiff's] use of [Defendant's] property was under a claim of right to use [Defendant's] property in this manner; and
- ~~3. 4. That~~ [Plaintiff's] use of [Defendant's] property in this manner was adverse; ~~and~~
- ~~4. That [Plaintiff] continuously used [Defendant's] property in this manner for at least 20 years.~~

If you find that [Plaintiff] has proved each of these elements by clear and convincing evidence, then [Plaintiff] is entitled to a prescriptive easement to continue using [Defendant's] property for [describe the particular use].

[CV924]

If [Plaintiff] ~~has shown by clear and convincing evidence that you find~~ [Plaintiff's] ~~open and notorious~~ use of [Defendant's] property ~~was open and continuous notorious use of [Defendant's] property~~ under a claim of right to use [Defendant's] property ~~continued~~ for a period of twenty years, then you must presume that the use was adverse unless [Defendant] proves that [Plaintiff's] use was not adverse for a period of twenty years. ~~[Defendant] [or a previous owner of [Defendant's] property] gave permission to [Plaintiff] for the use when it first began.~~

As is, the presumption instruction conflicts with *Lunt v. Kitchens*, 123 Utah 488, 260 P.2d 535, 537-38 (1953) (“In other words, the presumption of adversity will not arise under mere use by a licensee and knowledge of such use on the part of the licensor. The use cannot be adverse when it rests upon license or mere neighborly accommodation.” (Citation omitted)).

The presumption instruction reads as if there is only one way for the landowner to rebut the presumption—by showing that the use was initially permissive. The case law does not so limit the landowner. It states that “the landowner **may** rebut this presumption by showing that “the use was *initially* permissive.” *Harrison*, 2020 UT 22, P 51 (quoting *Valcarce*, 961 P.2d at 311 (initial emphasis added)). There’s at least one other way for a landowner to rebut the presumption: “where the prescriptive user alters his or her mental state (so that the prescriptive user begins using the easement under the owner rather than against the owner). An alteration in a prescriptive user’s mental state most often occurs where the prescriptive user accepts a landowner’s permission to continue using the easement.” *Id.* P 30.

The Committee may want to consider other instructions. For example, Utah caselaw provides:

“When a party’s use of property is permissive at its inception, the use cannot ripen into a prescriptive right unless there is a later distinct assertion of a right hostile to the owner, which is brought to the attention of the owner, and the use is continued for the full prescriptive period.” *Green*, 886 P.2d v. *Stansfield*, 886 P.2d 117, 121 (Utah Ct. App. 1994) (quoting *Wiedman v. Trinity Evangelical Lutheran Church*, 610 P.2d 1149, 1152 (Mont. 1980)); *Gashler v. Peay*, Case No. 20040948-CA, 2006 Utah App. LEXIS 32, *3 (“An antagonistic or adverse use of a way cannot spring from a permissive use. . . It cannot be adverse when it rests upon a license or mere neighborly accommodation.” (Quoting *Jensen v. Gerrard*, 85 Utah481, 39 P.2d 1070, 1073 (1935))).

“[T]he extent of a prescriptive easement is measured and limited by its historic use during the prescriptive period,” which “means that the ‘purpose for which the easement was acquired’ limits both the extent of the easement right as well as the physical boundaries of the easement itself.” *Judd*, 2017 UT App 56, ¶ 58 (quoting *Valcarce v. Fitzgerald*, 961 P.2d 305, 312 (Utah 1998) (plurality opinion), and *Whitesides v. Green*, 44 P. 1032, 1033 (Utah 1896)); *SRB Inv. Co. v. Spencer*, 2020UT 23, 463 P.3d 654.

TAB 5

CV132A ~~Out-of-state or out-of-town experts~~ witnesses.

You may not discount the opinions of ~~[name of expert]~~ a witness merely because of where [he/she] lives or practices. Likewise, you may not discount the opinions of a witness merely because of how their testimony was delivered to the jury, be it in-person or by audio visual means.

~~References~~

~~Swan v. Lamb, 584 P.2d 814, 819 (Utah 1978).~~

~~MUJI 1st Instruction~~

~~6.30~~

~~Committee Notes~~

~~The committee was not unanimous in its approval of this instruction. Use it with caution.~~

~~Amended Dates:~~

~~3/2020~~

TAB 6

MUJI Civil Upcoming Queue:

Numbers	Subject	Members	Progress	Next Report Date
1000	Products Liability	Tracy Fowler, Paul Simmons, Nelson Abbott, Todd Wahlquist	Appeared on Agenda November 2021. Continuing to work and will report back.	2023
107A	Avoiding Bias	Judge Kelly, Judge Landau, Alyson McAllister, Doug Mortensen, Rachel Griffin, Ruth Shapiro, Marianna Di Paolo, Annie Fukushima	Approved in October 2022. Presented to Judicial Council November 2022. Discussed at December meeting. Went to Board of District Court Judges. Discussed at May meeting; approved for publication and public comment.	Sept. 2023 (after public comment)
900	Easements and Boundary Lines	Adam Pace, Robert Cummings, Robert Fuller, Doug Farr	Finished Boundary by Acquiescence. Prescriptive Easement draft CV920-925 addressed at January, February, April, and May 2023 meetings. Easement by Necessity draft CV930-931 addressed at April 2023 meeting. Easement by Implication CV940-941 addressed at April and May 2023 meetings. Easement by necessity and implication are ready for a vote at the August meeting. Robert Fuller group to address Chris Hogle feedback re CV922 and 924 and other possible instructions at a future meeting (Sept.).	Sept. 2023
1700	Assault / False Arrest	Mitch Rice, David Cutt, Andrew Wright, Alyson McAllister	Mitch is circulating instructions with the group and will report back.	Oct. 2023?
2400	Insurance	Andrew Wright, Richard Vazquez, Stewart Harman, Kigan Martinaeu	Appeared on Agenda March 2022. Currently 5 members – 3 defense, 2 plaintiffs. Will work on one more plaintiffs attorney.	?
	Unjust Enrichment	David Reymann	Stacy was researching and following up on these instructions.	
1700	Abuse of Process	David Reymann	Instructions were shared in the past, were these completed? Marianna could only find notes as to intention to form this subcommittee.	
2700	Directors and Officers Liability	Adam Buck	Lauren has been working with Adam to fill this group and has reached out regarding a timeframe.	
2500	Wills / Probate	Matthew Barneck; Rustin Diehl	Matthew and Rustin have met to discuss direction and have started	

			reaching out to various recommendations – Elder law section, Probate Subcommittee, WINGS, recommended individuals.	
2300	Sales Contracts and Secured Transactions	Matthew Boley, Ade Maudsley	Matthew and Addie are willing to work on this topic and would like more feedback from the Committee.	
	Case law updates	TBD	Previous chairs or group leads may have feedback.	

Archived Topics:

Numbers	Subject	Completed
1500	Emotional Distress	December 2016
200 / 1800	Fault / Negligence	October 2017
1300	Civil Rights: Set 1 and 2	September 2017
1400	Economic Interference	December 2017
1900	Injurious Falsehood	February 2018
1200	Trespass and Nuisance	October 2019
100	Uniformity	February 2020
1600	Defamation Update	March 2022, December 2022
135	Pretrial Delay	December 2022, February 2023
107A	Avoiding Bias	May 2023