



Karen S. Precella

Senior Counsel

karen.precella@haynesboone.com

Fort Worth

+1 817.347.6620

PRACTICES Appellate, Litigation, Oil and Gas Litigation, Energy Litigation

As an experienced and dedicated appellate lawyer, Karen Precella has secured favorable rulings in all phases of trial and appellate proceedings—from pre-trial summary judgment to post-verdict motions for judgment notwithstanding the verdict to appeals at the intermediate and supreme court levels. Karen, co-chair of Haynes and Boone’s Appellate Practice Group, has briefed and argued numerous cases in the Fifth Circuit and Texas appellate courts. She understands that an appellate practice involves not only an in-depth knowledge and respect of the law but also working together with the trial team to get the best results for the client.

Karen speaks and writes frequently on appellate issues and has earned a state-wide reputation on jury charge and mandamus procedures through her legal writing and bar service. She served a three-year term as Chair of the State Bar Pattern Jury Charge Committee for the Business Volume, served on the Pattern Jury Charge Oversight Committee, and now serves on the Pattern Jury Charge Committee for the Oil and Gas Volume. Karen has taught jury charge procedures at the Texas College of Judicial Studies and Annual Judicial Conference on numerous occasions. She is a contributing author for two American Bar Association books—*A Practitioner’s Guide to Appellate Advocacy* (Anne Marie Lofaso ed., 2010), and *The Class Action Fairness Act: Law and Strategy* (2013), and taught legal writing for several years at the Texas A&M School of Law.

Karen is also committed to bar and community service work in a wide variety of organizations. She has served on the board of editors for the Texas Bar Journal, co-chair of the Appellate Practice Committee of the American Bar Association’s Section of Litigation, council member of the State Bar of Texas Appellate Section, and chair of the Tarrant County Appellate and Business Litigation Sections. She is active in the Federal Bar Association as well. Karen currently serves on the Board of the Fort Worth Public Library Foundation and continues to be active with the Fort Worth Chamber of Commerce Governmental Affairs Committee and Central Area Council after the end of her Board term. Karen is also the administrative partner of the Fort Worth office of Haynes and Boone.

QUALIFICATIONS

EDUCATION

- J.D., Southern Methodist University Dedman School of Law, 1991, *cum laude*; Order of the Coif; Leading Articles Editor, *Journal of Air Law and Commerce*

HAYNES BOONE

- M.B.A., University of Texas at Arlington, 1983
- B.S., University of Texas at Arlington, 1979, *highest honors*

ADMISSIONS

- Texas

COURT ADMISSIONS

- United States Supreme Court
 - U.S. Court of Appeals for the Federal Circuit
 - U.S. Court of Appeals for the Fifth Circuit
 - U.S. Court of Appeals for the Ninth Circuit
 - U.S. Court of Appeals for the Second Circuit
 - U.S. Court of Appeals for the Sixth Circuit
 - U.S. District Court for the Northern District of Texas
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PUBLICATIONS AND SPEAKING ENGAGEMENTS

- “Will Your New Trial Order Withstand Appellate Scrutiny?,” author, Litigation Section, State Bar of Texas, News for the Bar, January 2021.
 - “How to Preserve Evidentiary Error for Appellate Review,” author and speaker, Advanced Evidence and Discovery, State Bar of Texas, April 2021, May 2021.
 - “Error Preservation: Making a Record Without an Express Written Ruling,” author, Litigation Section of the State Bar of Texas, News for the Bar, October 2020.
 - “Minefields on Appeal,” speaker, TexasBarCLE’s 36th Annual Course Advanced Personal Injury Law, July 30, August 6 and September 3, 2020.
 - “Mandamus Update,” speaker, Litigation Update Institute 2020, Texas Bar CLE, Austin, Texas, January 31, 2020.
 - “Jury Charge Update,” speaker, Advanced Civil Trial Course, State Bar of Texas, San Antonio, Texas, July 18, 2019; Dallas, Texas, August 22, 2019; Houston, Texas, October 31, 2019.
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PROFESSIONAL AFFILIATIONS AND ENGAGEMENTS

- Board Member, Council of Appellate Lawyers, American Bar Association (2021-2024)
- Planning Committee, Appellate Judges Education Institute, Council of Appellate Lawyers, Judicial Division, American Bar Association (2017-2021)
- Co-Chair, Appellate Practice Committee, American Bar Association, Section of Litigation, (2009-2012); Co-Chair, Appellate Rules and Statutes Subcommittee (2005-2009)
- Fellow, American Bar Foundation
- Council Member, Litigation Section, State Bar of Texas (2019-2025)
- Editorial Board, Texas Bar Journal (2009-2015)
- Member, State Bar of Texas Pattern Jury Charge Oversight Committee (2003-2005), (2022-2025)
- Member, State Bar Pattern Jury Charge Committee, Oil and Gas Volume (2013-2022)
- Chair, State Bar Pattern Jury Charge Committee, Business, Consumer and Employment Volume (2006-2009) (Vice Chair, 2003-2006; Member, 2001-2009)
- Council Member, Appellate Section, State Bar of Texas (2008-2011) and chair of various committees (2012-2021)
- Member, Texas Supreme Court Historical Society
- Sustaining Fellow, Texas Bar Foundation

- Faculty, Texas College of Judicial Studies and Annual Judicial Conference (April 2013, April 2012, April 2009, April 2008, September 2007, September 2006, May 2005, August 2002, May 2002)
 - Board Member, Tarrant County Bar Foundation (2020-2023)
 - National Delegate/Membership Chair, Fort Worth Chapter, Federal Bar Association (2013-Present)
 - Director, Tarrant County Bar Association (2007-2008)
 - Chair, Tarrant County Bar Association's Business Litigation Section (2012-2013)
 - Chair, Tarrant County Bar Association's Appellate Section (2006-2007) (Vice Chair, 2005-2006; Secretary, 2004-2005)
 - Chair, Tarrant County Bar Association, Bylaws Committee (2009), All-Star CLE Committee (2008), CLE Committee (2004-2007)
 - Sustaining Life Fellow, Tarrant County Bar Foundation
 - Barrister, Associate, Eldon B. Mahon Inn of Court (2003-2006, 1994-1996)
 - Member, local legal mentoring and service organizations, including Eldon B. Mahon Inn of Court (2003-2006, 1994-1996), Texas Bar Foundation, and Tarrant County Bar Foundation
 - Adjunct Legal Writing Professor, Texas Wesleyan School of Law (1998-2001)
 - Board of Directors, Fort Worth Chamber of Commerce (2011-2014); Member, Governmental Affairs Committee and Central Area Council (2011-Present)
 - Board, Fort Worth Public Library Foundation (2010-2024)
 - Board, Big Brothers, Big Sisters of North Texas, Western Region (2010-2012)
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AWARDS AND RECOGNITION

- Ranked in *Chambers USA*, Chambers and Partners, Litigation: Appellate, Texas, 2012-2022
- Recognized as a Top Attorney in Tarrant County by *360 West Magazine*, Scott Publications, 2018-2021
- *The Best Lawyers in America*, Woodward/White, Inc., Appellate Law, 2005-2022
- *Martindale Hubbell® Law Directory* with a Peer Review Rating of AV Preeminent
- American Law Institute, 2007-Present
- Recognized in 2018 for having been included in *Super Lawyers*, Thomson Reuters, top-attorney lists for 10 years or more
- *Texas Super Lawyers*, Thomson Reuters, 2003-2020; Top 50 Texas Female Lawyers, 2004, 2005, 2008-2015, 2019, and Top 100 Dallas/Fort Worth Region Super Lawyers, 2010, 2012, 2014
- Top Appellate Attorney, *Fort Worth, Texas* magazine, Panther City Media Group, LP, 2002-2021
- Fort Worth Business Press Power Attorney List, 2013
- Outstanding Subcommittee Chair, 2009, Rules and Statutes Subcommittee, Appellate Practice Committee, ABA Section of Litigation
- Best Series of Articles in Local Bar Publication Award, State Bar of Texas, 2007
- Recognized for Contributions to CLE, Tarrant County Bar Association, 2006
- College of the State Bar of Texas, 1999-Present