

## Texas Rule 166a – Old vs. New (Side-by-Side Comparison with Deadlines)

Topic	Old Rule 166a	New Rule (with Deadlines)
Structure	Fragmented; traditional & no-evidence concepts scattered	Unified structure; defines Traditional, No-Evidence, and Combined motions
Motion Identification	No required labeling	Motions must be titled (Traditional / No-Evidence / Combined)
Grounds	Specificity required but loosely enforced	Express requirement to identify specific elements challenged
Response Deadline	Response due 7 days before hearing	Response due 21 days after motion is filed
Reply Deadline	No express deadline	Reply due 14 days after response is filed
Hearing Timing	No firm deadline; could be delayed indefinitely	Hearing/submission must occur no sooner than 35 days and no later than 60 days after motion is filed (up to 90 days for good cause)
Court Ruling	No ruling deadline	Court must rule within 90 days after submission or hearing
Clerk Duties	No express obligation	Clerk must promptly bring motion to judge
Hearing Request	Buried in motion or response	Must be stated on cover page
Continuance Practice	Based on case law	Codified affidavit requirement if additional time needed for evidence
Discovery Timing	No-evidence motion after adequate discovery (flexible)	Still required, but now within structured timeline
Process Driver	Hearing-driven	Filing-driven, deadline controlled
Overall Goal	Flexibility	Speed, clarity, and federal-style efficiency