

## Zach Wolfe's Cheat Sheet for Personal Jurisdiction in Texas Business Tort Cases

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Tort Claim	Basic Facts	Juris- diction?	Case(s)
Trade Secrets	Defendant received alleged trade secrets at Texas meeting	Yes	<i>Moncrief Oil Int'l, Inc. v. OAO Gazprom</i> , 414 S.W.3d 142 (Tex. 2013)
Trade Secrets	Defendant received or used alleged trade secrets outside of Texas	No	<i>RSM Prod. Corp. v. Global Petroleum Group, Ltd.</i> , 2016 WL 6110913 (Tex. App.—Houston [1st Dist.] Oct. 20, 2016, no pet. h.)  <i>Bower v. Am. Lumber Co.</i> , 2015 WL 1755311 (Tex. App.—Waco Apr. 16, 2015, no pet.)
Fraud	Defendant made alleged misrepresentation to Texas plaintiff from outside Texas	No	<i>Michiana Easy Livin' Country, Inc. v. Holten</i> , 168 S.W.3d 777 (Tex. 2005)
Fraud	Defendant made alleged misrepresentation to Texas plaintiff <i>in</i> Texas	Yes	<i>Searcy v. Parex Resources, Inc.</i> , 496 S.W.3d 58 (Tex. 2016)
Tortious Interference	Defendant allegedly interfered with Texas company's contract from outside Texas	No	<i>Moncrief</i>  <i>Searcy</i>
Participation in Breach of Fiduciary Duty	Defendant sent representatives to meetings in Texas and chose to buy chain of Texas hospitals from Texas seller	Yes	<i>Cornerstone Healthcare Group Holding, Inc. v. Nautic Mgmt. VI, LP</i> , 493 S.W.3d 65 (Tex. 2016)