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Vernon's Texas Code Forms **Annotated Uniform Commercial Code** **Forms**

Fourth Edition
2026 Supplement
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Enclosed is 2026 supplement for Volumes 1 and 2 of Vernon's Texas Forms Annotated Uniform Commercial Code Forms. This enclosure replaces the prior supplements of 2025. Please note that, for ease of handling, the materials in this shipment may ship in more than one box.

Shelving Instructions

- REMOVE and RECYCLE the 2025 supplements.
- PLACE the new 2026 supplements.

Highlights

2025 was a legislative year in Texas. The Texas legislature passed two items of legislation pertaining to the Texas UCC:

- SB 1239, amending Chapter 8 to encourage selection of Texas law in sovereign debt transactions; and
- SB 2221, amending Chapter 9 to create a mechanism to contest fraudulent UCC filings.

There were also several case decisions of interest over 2024 and the early part of 2025, including:

- *Targa N. Delaware, LLC v. Franklin Mountain Energy 2, LLC*, 2025 Tex. Bus. 12 (Tex. Bus. Ct. 2025), finding a contract required the seller to sever natural gas and deliver it to the buyer at designated locations, making the gas personal property rather than real property. See § 2.107 FORM 1.
- *Advantage Aviation Techs. II LLC v. Sw. Aviation Specialties LLC*, 2025 WL 847866 (N.D. Tex. 2025), dealing with a battle of the forms in a lease under Chapter 2A. See § 2A.206 FORM 1.
- *Bayport Polymers LLC v. CB&I LLC*, 699 S.W.3d 626, 114 U.C.C. Rep. Serv. 2d 537 (Tex. App. Houston 14th Dist. 2024), considering the definition of material fraud in connection with a letter of credit under Chapter 5. See § 5.108 FORM 1.

- *In re With Purpose, Inc.*, 2025 WL 1698694 (Bankr. N.D. Tex. 2025), questionably holding that a secured party had no interest in a commercial tort claim as proceeds. See § 9.108 Example 7.

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