

TEN RULES FOR DIRECT EXAMINATION

1. Select witnesses who advance your theory of the case
2. Remember that your client is always a potential witness
3. Prepare the witness(es) and PRACTICE
4. Start strong; finish strong; bury bad stuff in the middle
5. Use “chapters” and “signposts”
6. Ask **open-ended** questions
 - a. Who
 - b. What
 - c. When
 - d. Where
 - e. How
 - f. Why
 - g. Tell us about/Describe
7. Ask **clear, concise** questions that focus the witness on the facts you want to elicit
8. Vary tempo to make your point
9. LISTEN
10. Redirect only if necessary