

## 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 and tone to make your point.
9. LISTEN.
10. Redirect only if necessary.