

Connection to Voir Dire

- Identify the problems of your case and discuss during jury selection in the form of jury instructions
- Sympathy for defendant
- Cannot consider penalty
- Inconsistent statements
- Child witnesses
- Totality of the evidence etc.
- Wherever you think the defense is trying to go...
- "Ladies and gentlemen we talked about this during jury selection..."

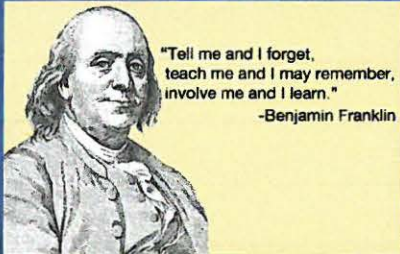
Preparation

- Preparation for closing begins at filing
- Continues through each phase of the trial

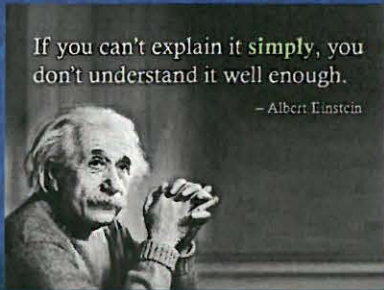
Be Careful with "Themes"



Empower of the Jury



Keep it Simple



Focus

"There are no other cases. This is the case."



- Lose your keys, loose your wallet, loose your sleep, but win your case

Presentation

- A trial is a contest of impressions
- You are a professional, but also human
- Your professionalism will enhance your credibility
- Your humanity will make them *want* to believe you
- Connect to them
 - Look every one of them in the eye
- Own the courtroom

- Take your time
- Never read a closing... (Law is OK)
- Slogans are for insurance companies
- What is a "Theme"?
- "Ladies and gentlemen... This is a case about..."
