Volume 1

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§	9:8	—Credibility: The pursuit of justice					
-	9:9	—The plaintiff is not looking for sympathy					
	9:10	—The issues are simple and the jury is competent					
_	9:11	—Rectifying wrongs					

- § 9:12 Jury purpose
- § 9:13 —To judge the evidence
- § 9:14 —To judge the parties and their actions
- § 9:15 —To send a message to the defendant: Deter future actions
- § 9:16 —To render justice
- § 9:17 —To return money damages
- § 9:18 —Itemization of the various elements
- § 9:19 —You cannot restore the plaintiff's health
- § 9:20 —This is the plaintiff's only chance to ask for damages
- § 9:21 Reminding jurors of their voir dire commitments
- § 9:22 Strategic use of language
- § 9:23 —Use of words and labels to describe and to create dramatic impact
- § 9:24 —Use of examples and figurative language to create meaning

§	9:25	Communication errors and oversights to avoid					
§	9:26	Principles of summation; use of exhibits					
§	9:27	—Use	—Use of quotations and anecdotes				
§	9:28	—Poir	nts saved for closing argument				
§	9:29	—Affii	rmative persuasion				
§	9:30	—Usii	ng opposing counsel's mistakes				
§	9:31	—Mai	ntain eye contact				
§	9:32	—Len	gth of argument				
§	9:33	Illustr	rative closing argument for plaintiff in child death				
		case					
§	9:34	Conclu	asion				
A	ppendi	x 9-1	Closing Argument to the Jury				
A	ppendi	x 9-2	Closing statement in dental malpractice case				
A	ppendi	x 9-3	Closing argument in Oklahoma City bombing trial				
A	ppendi	x 9-4	Closing argument in US v. Microsoft				
A	ppendi	x 9-5	Closing argument in Discrimination Case				
A	ppendi	x 9-6	Closing Statement of Defendant in Tobacco Litigation				

CHAPTER 10 CLOSING STATEMENT

- § 10:1 Introduction
- § 10:2 Tone

I. THEMES

- § 10:3 The defendant was negligent
- § 10:4 Credibility: Plaintiff's v. defendant's witnesses
- § 10:5 Credibility: Plaintiff v. Defendant
- § 10:6 Credibility: The pursuit of justice
- § 10:7 The issues are simple and the jury is competent
- § 10:8 Rectifying wrongs

II. JURY PURPOSE

- § 10:9 To judge the parties and their actions
- § 10:10 This is the plaintiff's only chance to ask for damages
- § 10:11 Reminding jurors of their voir dire commitments

III. STRATEGIC USE OF LANGUAGE

- § 10:12 Use of words and labels to describe and create dramatic impact

IV. BRAIN INJURY CASE

§ 10:14 Introduction § 10:15 Tone § 10:16 Themes § 10:17 -Common sense § 10:18 —Credibility —Credibility: Plaintiff v. Defendant § 10:19 § 10:20 —Plaintiff's witnesses v. defendant's witnesses § 10:21 —Rectifying wrongs Shaping juror purpose § 10:22 § 10:23 —Judging the evidence § 10:24 -Extent of the injuries and the amount of the damages Strategic use of language § 10:25 § 10:26 —Use of words and labels to describe and to create dramatic impact —Use of examples and figurative language to create § 10:27 meaning

Appendix 10-1 Closing Statement in Obstetrical Negligence Case

CHAPTER 11 A STRUCTURE FOR SUCCESSFUL TRIAL TECHNIQUE

- § 11:1 The structure for successful trial technique
- § 11:2 Implications
- § 11:3 Bad form in trial and its consequences