OPENING STATEMENTS
PRIMACY

• Organize around the principles of primacy and recency
• Begin with a statement of your theme and theory
PURPOSE

• Tell a story arranged around your theory
  – Short
  – Simple
  – Understandable
  – Use headnotes, rhetorical questions and conclusory statements to organize
  – Put the listener at the time and place
  – Explain motives/place moral blame
  – Avoid “The evidence will show . . .”
– Anticipate the other side’s case
– Paint with a broad brush
– Avoid overstatement/avoid questionable evidence
– Use exhibits and demonstrative aids
– Avoid damages, but discuss injuries
PUNCH

• Use impact words and phrases
STYLE

• NO READING
• Prepare and rehearse
• Project belief
• Maintain eye contact
• Move for a purpose
• Use appropriate gestures
• Be dynamic
• Avoid distracting mannerisms
PROHIBITED CONDUCT

• No argument