

CLOSING ARGUMENT

Closing Argument

- **Empower the Jury**
- **Do Not Overly Rehash the Evidence**
- **Show Distinction between credible evidence and non-credible evidence**
- **Argue – Apply Credible Facts to the Law**
- **Always Argue Burden of Proof**

Closing Argument

- **Explain Jury Instructions**
- **Make Every Word Matter**
- **Diffuse Opponent's Arguments**
- **Anticipate what jurors want or need to know**
- **Clear up mysteries**

Closing Argument

- **Cover all Hurdles to Recovery**
- **Use Verdict Form**
- **Make the Ask of Jury (Defense Verdict)**
- **Admitted Liability (Give a Number “Up to”)**