

# Rule 612: Refreshing Recollection

Kicking It Old School  
Old Blue v. Harrison University

# Step 1

- Establish that the Witness Does Not Remember



# Step 2

- Show the Witness Previously Remembered



# Step 3

- Ask the Witness if Anything Would Help Them Remember



# Step 4

- Show the Item to Opposing Counsel and the Witness



# Step 5

- Ask the Witness If Their Recollection Has Been Refreshed
  - Read/Review the Item Silently
  - Put the Item Down
  - If a document, turn it over

# Step 6

- Ask Your Original Question

