Foreword

Some trial lawyers look for every advantage over their competitors. These lawyers keep close to the vest their techniques for handling witnesses and offering and objecting to evidence. They do not share the jewels that they have garnered over many years of experience.

Other trial lawyers love the concept of trials, admire their comrades in the trenches, understand that their own skills and talents benefited from the guidance they received from their predecessors at the bar, and want to give something back to the profession in which they take pride. Paul Mark Sandler and James K. Archibald of Baltimore, Maryland, are two of the best examples of such trial veterans. They are confident, experienced, talented lawyers who take time from busy trial schedules and demanding practices to offer young lawyers the wisdom they have learned from years of trying cases.

*Model Witness Examinations* is a gift to young lawyers and to older lawyers who are called in mid- or late career to try cases. The book demonstrates how to offer testimony on direct examination, how to cross-examine and impeach various types of witnesses, and how to use discovery in the examination of witnesses. Sandler and Archibald not only illustrate model examinations, they also offer citations to rules and cases that can be relied upon by an advocate preparing an examination on an important point.

The illustrations are authentic. Sandler and Archibald know what issues arise at real trials, and their experience enables them to offer examples that are genuinely useful. They also know the danger in lawyers trying to use the exact same words and phrases over and over and advise their readers that the model examinations are starting, not ending, points. They are not a substitute for strategic thinking and are not meant to be the last word on effective advocacy.

In short, *Model Witness Examinations* is a wonderful gift from two lawyers who love the trial process to all those who will follow them.

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