



The Jury EXPERT

The Art and Science of Litigation Advocacy

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Preparing the Narcissistic Witness

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The Preparation of Narcissistic Witnesses

Shortly after the July issue of TJE published, we received an email from an attorney-reader in response to the Christie Brinkley divorce coverage wherein the court-appointed psychologist described Peter Cook, as a "narcissist with an insatiable ego who needs constant reassurance that he is a terrific guy" (CBS News.com, 7/8/2008). "I wonder", wrote our reader, "how trial consultants would recommend proceeding with a narcissistic witness".

We asked three experienced trial consultants with different professional backgrounds to share their ideas about working with these difficult witnesses: Doug Keene (psychology), Charli Morris (communication), and Lisa DeCaro (theater). They describe their individual approaches with narcissistic witnesses on the following pages.

"I'm Better Than I Need To Be!": Preparing Narcissistic Witnesses

by Douglas L. Keene

"I need you to come in and prep this witness before I kill him!"

A few years ago a client called me and said his expert witness was making him crazy. The engineer had been hired to consult and then testify in a patent dispute, and was so proud of his idea of how to present his work that he was refusing to take any direction whatsoever. In this case, it meant that he was determined to tell a story that non-engineers could not possibly understand. Not surprisingly, the attitude that came along with his story reeked of, "If you don't understand what I am saying, you are not worthy." My frazzled client truly wanted to punch him.

So. Is he a narcissist? Is he just insecure? Is he just a jerk? How do you bring him around?

What is narcissism?

While we all know what narcissism looks like to us, there are some very specific definitions it makes sense to review. In psychological terms, a narcissistic person is prideful and grandiose, feels unique and special, is vain and self-centered, and craves attention and admiration. A clinical diagnosis requires careful attention and specialized training. In real life, though, we usually identify them much more easily, and it boils down to the realization that, “(S)he is an insensitive, arrogant @\$*%#!”. [I have just spared you six years of graduate training.]

What is egotistical to some is nothing more than positive self esteem to others. The most commonly administered test in clinical psychology is the Minnesota Multiphasic Personality Inventory or the MMPI (Hathaway and McKinley, 1942). When it was updated in 1989, one of the items that had shifted the most was a telling comment on American culture. A statement that in the past was rarely admitted was now commonly endorsed. The statement was “*I am an important person.*” What would have seemed narcissistic and prideful in the 1940s had turned into a statement of positive self-worth. Or, to slide back into psychobabble, it is healthy narcissism. This is different from unhealthy narcissism, which can make otherwise friendly trial lawyers want to punch you. I will focus on three degrees of narcissism: healthy narcissism, traumatic narcissism, and characterological narcissism. Over the course of a career as a litigator, you will manage witnesses in each category. Getting the best testimony from any witness requires that you understand them and know how to teach them.

Which is which?

1) Healthy Narcissism is what allows you to maintain your self-esteem when the world is giving you a bad time. It is essential if a witness is going to stay upright during an aggressive cross-examination. Frequently, these witnesses enjoy the challenge of testimony. They can need reminding not to get carried away with what they might see as ‘the game of testimony’, but overall they can be worked with. The problems arise with the next two (and more severe) types of narcissism.

2) Traumatic Narcissism is very common in civil litigation, for understandable reasons. If you are a plaintiff, you are being accused of not deserving the recovery you are seeking. If you are a defendant, you are being accused of doing something so wrong that you caused serious harm to someone else. Both situations can leave the party feeling emotionally wounded.

It can be hard to understand why a witness is defensive about the slightest criticism, but if you look more closely, these witnesses tend to be people who feel disrespected and vulnerable. They may be the kind of person who feels responsible for everything (a burdensome form of narcissism), and they may be depressed. Anything that increases that sense of vulnerability—like the prospect of a contentious cross-examination—causes them to over-react.

Think of narcissism as a seeming abundance of self-confidence and self-esteem in one who is actually very fragile. When their self-image is shattered, the resulting trauma (which some call ‘narcissistic injury’) causes them to become self-protectively defensive.

For example, a plaintiff in a car wreck is being accused by the defense of causing his own injury, which is an intolerable idea to him. He is being accused of malingering or exaggerating claims of pain and disability, which he feels is adding insult to injury. In a different case, a defendant is being accused of breaching a contract and causing financial ruin to the plaintiff. The defendant is frustrated and angry, because she feels like she bent over backward to try to resolve the issues, and now the plaintiff is abusing her for those efforts.



3) Characterological Narcissism is the kind of narcissism that makes you want to punch someone. These individuals aren't narcissistic because their self-image is being shattered—they act this way because it is simply who they are. In their own minds, they are marvelous people, worthy of special privileges and the admiring attention of others. They insist that they know what is best, they refuse to compromise, they think people who disagree with them are stupid, evil, or against them, and they don't change. Ever. This is often called a character 'feature'. Your best efforts to comfort them, cajole them, and change them are for naught. Your time is better spent herding cats than trying to make them different people. But you *can* make them better witnesses.

How can you tell the difference?

One simple strategy for sorting this out doesn't take very long. Here is what you do: Be nice to them. Be supportive. Listen to their story. Don't fan the flames of their biggest grievances, but let them know that you feel their distress and that you respect them. Do that for 10 or 15 minutes, and see what happens. If they are traumatized they will start to feel safer, and they will become more open to your suggestions. They will calm down.

If, on the other hand they are more characterological, they will respond to your thoughtfulness by becoming more agitated and morally indignant. Their sense of entitlement and desire for vengeance often escalates. They will not take what you say as reassuring, they will take your kindness as evidence that their entrenchment is justified. "Now you finally understand, so you must see how right I am."

An additional strategy for making the assessment between traumatic narcissism and characterological narcissism is through the use of focus groups. When reviewing or observing focus group reactions:

1. A narcissistically traumatized person will hear criticism and realize that to achieve his goals he will have to come across differently. It is an eye-opening experience.
2. A characterological narcissist will insist that the jurors were stupid, or that they would feel differently if they had more information. It confirms the view that the world is against them.

And what do you do?

Pay attention to the type and degree of narcissism and tailor your interventions accordingly.

Healthy narcissism:

People who are operating with healthy narcissism want to be well received and well liked, so they tend to take advice well if it is couched in terms of, "You will be understood better if..."; "The jury is going to really like it if you..."; or "Your unique sense of fashion is likely to be misinterpreted by some members of the jury".

Traumatic narcissism:

Witnesses who are narcissistically wounded or traumatized need some comfort and support, and then you move into "reality-check mode". They need to understand that there is a limit to what a jury will understand in the brief time the court permits, but it will be enough. In a rational way, plot out goals for what needs to be accomplished in their testimony, what questions and answers will be best understood, and what answers create confusion or open up unnecessary cans of worms.

One of the messages that wounded witnesses struggle with the most is, "The jury will never understand everything you have gone through." Ironically, it is a great affirmation to any witness with narcissistic tendencies, and has the added virtue of being completely true. You can tell them that their story is going to be told through the famous Rule of Three, that instead of itemizing every complaint, or every symptom, or every effort that was made, that you give examples, and the jury will know that these are merely indicators of the larger situation.

Characterological narcissism:

The strategy for preparing characterological witnesses can require some creativity, but it is simple. The solution is to redirect them, but not to correct them. In the example of the witness my client wanted to punch, I realized that he was not merely a geeky engineer with poor social skills (who, by the way, can often be shaped up into wonderful witnesses)—he was a full-blown characterological narcissist.



The client had liked that about him when he was hired, because he was so certain about what the solution was, and how it would be proven. The testimony was going to be hellish because he was in love with his own ideas, and insisted on explaining every technical nuance of the findings.

What I explained to him is that this phase of his work is completely different than what he had been doing; the research part was over, and we are now moving on. He is the absolute best expert in the world in that engineering phase, but he is a gifted rookie in this new one. The goal now is to become a great teacher of average 9th graders. This is his audience. His findings had to be tailored to meet the needs of his students or he would not succeed at the task. He didn't enjoy it, but it was a frame of reference that he couldn't dispute, and ultimately he testified successfully.

The challenge with the characterological narcissist is to get them to answer questions with an external perspective that they can comprehend, instead of speaking from their own internal frame of reference that the world finds annoying. You get much further with them if you never correct them or say that they are wrong (which only prompts an argument from them), but ask them if their 9th grade class is likely to understand what they just said. You can insist that 9th graders will get lost in all of those words, which is the same as saying “settle down and cut the jargon”, but they won't take it so personally.

Another strategy is to insist that the witness rehearse testimony as if the only person that needed to clearly and completely understand the answer is...his mother. What would Mom understand, and what tone of voice would you use when you explain it to her?

If it is a witness who insists on sharing every minute detail of their story, ask them who the least patient person is that they really like, in spite of their impatience. Have them rehearse testimony that would avoid the irritation of this favorite critic. Would George be tapping his foot? Would George be wishing you would get to the point?

The least successful strategy for dealing with narcissistic people of any type is to explain to them that they are getting it wrong, and to tell them to do it differently. It creates a power struggle that will only bring frustration. They will not take your wise counsel. Instead, back up, be nice, redirect them, and redefine their task in terms that will elicit a more likable witness.

Douglas Keene, Ph.D. [dkeene@keenetrial.com] is founder of Keene Trial Consulting and President of the American Society of Trial Consultants. While a psychologist he served the court as a testifying expert witness over 150 times. Since becoming a litigation consultant 15 years ago he has prepared hundreds of witnesses for trial, including witnesses from over 18 foreign countries. His national practice is based in Austin, Texas [<http://www.keenetrial.com>].

Preparing the Narcissistic Witness

by Charlotte A. Morris

When I hear or read the term “narcissism” I can’t help but picture the illustration in my undergraduate textbook from Greek & Roman Mythology. You know the one I mean: a sketch of Narcissus gazing contentedly at his reflection in a pool of water.



And when I hear psychologists use the term – like the one who recently described Christy Brinkley’s soon-to-be-ex-husband Peter Cook as narcissistic – I understand that it’s probably a little more complicated than, “Mirror, Mirror, on the wall...”

One Size Does Not Fit All

Most often I encounter the narcissistic witness who is described first by the lawyer or client as self-centered, egotistic, arrogant or unsympathetic. In my experience none of these terms are one-size-fits-all, and that is the secret to addressing a host of witness traits that interfere with a person’s ability to effectively communicate the truth. I care less that those traits are present and more about why they persist in the context of the case.

Take, for example, preparing physicians for deposition and trial. Lawyers recognize how readily jurors may apply a common stereotype to doctors that reads a lot like the criteria for narcissism: arrogant, lacking empathy, and maybe even guilty of “playing God” a time or two.

Consider the following witness preparation stories of two emergency room physicians in separate medical malpractice lawsuits involving similar claims of missed or misdiagnosis. The doctors were both “stereotypical” in their communication styles at the start of our sessions – haughty, indifferent, impatient with the process, dismissive – but each for unique reasons.

Case One: What Seems to Be the Problem, Doctor?

Dr. One had already given his videotaped deposition when the client called to ask for my help preparing him for trial. When the DVD arrived I could not believe my eyes. The doctor appeared at the head of the conference room table wearing a t-shirt, sunglasses on his head, one ankle crossed over the other knee, and his chair tipped back with one shoulder slung over the back of the chair....for the entire deposition.

Wait, that’s not true. There were times when his impatience manifested itself as deep, audible sighs, eye-rolling, and intermittent bouts of lurching forward aggressively with his elbows on the table. When asked to testify about medical records he was cooperative right up until the moment he slid the paperwork off to the side or back in the direction of opposing counsel, as if it were hot to the touch. I later learned that he rode his bike to the deposition – it was a case down at the coast, after all – which explains the t-shirt and tennis shoes.

In this case the facts were better than average for the doctor, the diagnosis was tricky at best, and we felt confident that despite a disappointing outcome for the patient the doctor’s conduct was well within the standard of care. Nevertheless, Dr. One was put off by most of our questions about the care he gave the patient – even the friendly ones we thought might be developed eventually for direct examination – and the lawyer was quickly frustrated.

At one point the lawyer left the room, and I remained with the witness who had been told we could not discuss the case with each other outside the presence of the attorney. As soon as he heard the door in the latch, the doctor started in on me.

I know we can't discuss the case, but can I tell you why this makes me so mad?

I feel just fine about the care I gave the patient that night and I'm not embarrassed to defend it, but frankly I wish they would just pay the people a million dollars. I'm serious. That might be the only way our system will get fixed.

Our healthcare system today is broken: for doctors and for patients. People don't get the routine care they need and emergency rooms around here don't have the resources to take care of the growing population. I see patients one time – when they are really sick or really hurt or just don't have their own doctors – and there's no continuity in care. I don't have any control over what happens to them after I discharge them from the Emergency Department.

And anyone who wants to sue me can, so I'm stuck in a lawyer's office all day instead of treating patients. We ought to just pay the plaintiffs until the system is totally bankrupt, and start all over again from the ground up.

This kind of confession happens more often than lawyers might think and we always learn something important and useful to turn an ineffective witness around. In this case, after heavy doses of empathy for the witness, I asked the doctor to share his concerns with the attorney. And then we spent time talking about his perspective and how it might be useful in his defense.

Together we reached the following conclusions:

1. **The physician could make our “system” work better by treating the litigation process with respect.** A witness can and should cooperate fully, consider the questions carefully, and answer thoughtfully every time. In return, jurors will approach our case with the same level of attention and degree of care. Jurors will also appreciate that the lawsuit is important to the doctor and meaningful to his professional practice.
2. **The jury may well agree that our “system” is broken.** Focus group participants tell me all the time about their frustration with healthcare. What if the jury understood that it's frustrating for doctors too? What if they knew that this doctor empathizes with patients who feel equally squeezed by the constraints on the system? Perhaps our direct examination could allow the doctor to talk a bit about how the practice of medicine has changed and whether or not he thinks it could be improved? Isn't it possible that – in this case with favorable facts/medical records – jurors would be reluctant to punish the doctor for problems that are systemic in healthcare?

Case Two: Put the Shoe on the Other Foot

Dr. Two was seemingly worse off than Dr. One, but the good news is that the attorneys invested in preparation *before* his deposition. Dr. Two was also impatient with the process, defensive and extremely anti-social. He greeted us by saying, “I know you guys like spending a day this way, but I don't.” Funny, bad attitudes like his are not exactly *why* I enjoy spending a day with lawyers and witnesses, but I didn't argue.

The lawyer in this case – confident in his thorough knowledge of the facts and medicine – thought I was there just to “fix” all of the doctor's verbal and non-verbal communication problems: nervous mannerisms, lack of eye contact,

monotone delivery, poor listening habits, answering too quickly, and others. True enough, all of those things needed fixing but once again it was the time spent getting to know the witness better that proved key to resolving the behaviors that made him appear so... *narcissistic*.

After more than half a day of the doctor telling us both that he couldn't be bothered with this lawsuit – and the attorney repeatedly, positively reinforcing the doctor's perspective that this was just a case of a greedy patient cashing in on his own misfortune – I asked a simple question that shifted the doctor's paradigm for the case considerably. It went something like this:

Doctor I think I just heard you say something about being in a dispute with your former partners in business. Were you a plaintiff in a lawsuit?

Yes. I sued my partners and they settled out of court because they knew I could win.

*So, in other words, you know what it's like to be on the other side of a case, with a legitimate claim? Is it possible that your partners **then** thought **your** lawsuit was also frivolous, that **you** were being greedy?*

Pause. Pause. Pause.

There are probably only a few times in more than a dozen years that I've experienced such a dramatic moment with lawyer and witness, with such a stunning shift in the witness' perspective. This counts as one.

Try This with Narcissistic Witnesses in Any Case

Listen to their fears. It is easy to think that a highly capable, well-educated, experienced physician who faces the most serious medical emergencies would be fearless. But tough-talking witnesses are often compensating for their insecurity. The first example illustrates the importance of allowing (and inviting) a witness to share his fears, concerns and frustrations before digging right into the Q&A.



Be willing to go where a witness takes you. The first example also reminds us that witnesses themselves often hold the keys to case themes and strategies. By adopting the doctor's perspective on a "broken system" we were able to strategically focus on the limited amount of care the patient received before and after a single visit to the ER, so that jurors would understand how little time the defendant had to observe and consider the patients' history and symptoms.

Voir dire your witness. We wouldn't think of starting a trial without asking jurors if they've ever been in a similar situation, ever considered filing a lawsuit, or ever been involved in any way in a lawsuit. The same goes for witnesses. Be sure you know much more than what the records reveal so you can make good connections with – and encourage cooperation from – your own witnesses.

Encourage consideration of other perspectives. The doctor in the second example was actually incredibly insightful as he repeated back to me the point he understood me to be making. Within half an hour he was fully engaged in the process of preparing. At the end of the day, he was thankful for the experience. All it took was an opportunity for him to see the lawsuit from a different angle.

Mirror, Mirror On the Wall...

In stark contrast to the Roman mythological figure, I have observed that narcissistic witnesses do not look lovingly in the mirror at their reflections. In fact, many of them would prefer that all of us kindly look away; the scrutiny a witness endures is perhaps the worst of what a person goes through in the course of litigation.

There really is no secret to success with some witnesses: ask good questions that the lawyers may not have considered before; watch closely, and listen carefully. Deliver empathy in heavy doses without condescending or coddling. Believe that a witness – of any type – wants to be heard *before* he testifies.

*Charlotte A. (Charli) Morris, M.A. is a trial consultant in Raleigh, North Carolina (cmorris35@nc.rr.com). She consults on a wide variety of case types in venues across the country and devotes about half of her professional time to working with attorneys and their witnesses. Her book *The Persuasive Edge* (www.lawyersandjudges.com) draws on 15 years of experience and contains strategies for purposeful persuasion in every stage of litigation. When she's not consulting, Charli is a skilled mediator for her three very communicative children.*



Time flies!

*Soon the November issue of *The Jury Expert* will publish but...will you know?*

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“Joe is the Worst Witness I’ve EVER Seen”: Preparing the Narcissistic Witness without Losing Your Own Sanity

by Lisa L. DeCaro

Christie Brinkley’s ex-husband, Peter Cook, was labeled a “narcissist” by the court-appointed psychiatrist in the recent Brinkley/Cook divorce proceedings. Whether Cook is a narcissist or not, this is a label which carries very specific implications about a person’s character. To many of us, this label implies more than just extreme self-absorption. To a lawyer preparing the witness, that label sends the message: This guy comes across as a jerk, and he’s going to be difficult to work with. These are obviously not qualities which make for an effective and credible witness.

The psychiatrist’s categorization of Cook has brought this question to the fore for many attorneys: What do you do when your witness seems to fit the label of “narcissist?” What do you do when your key witness comes across as arrogant, self-absorbed, maybe even untruthful? By definition, these witnesses believe they already know how to do everything – including testify in court – better than others, so why should they listen to your advice or instructions?

We all know how vital the testimony of a key witness can be. His attitude can lose the case for you, and you know it.

For those of us who specialize in preparing “difficult” witnesses, this is a label we hear a lot. The call comes early in the morning, as if it kept the poor attorney up all night: “Okay, so this is absolutely the worst witness you’ve ever had to prepare. He’s a CEO, he’s used to being in charge, and he won’t listen to me when I tell him to change his behavior on the stand. His deposition would have been a disaster if he’d been videotaped. He comes across as an arrogant jerk, and he won’t believe me when I tell him to just answer the question!”

Narcissist or not, it’s clear that this witness – we’ll call him Joe – appears arrogant, is difficult to prepare, and generally rubs people the wrong way. We don’t know Peter Cook personally, but we all know the type. And Joe is a textbook case.

In the limited time his attorney has to prepare Joe for the stand, it is unlikely there will be any psychological breakthroughs which would make Joe a different person. Fortunately, we don’t really need to fix Joe’s psyche; we only need to discover what will make Joe *want* to testify in the most effective way, and teach him how to *look* like a good witness. You can make Joe a solid, maybe even great, witness, by making changes to his behavior, even without making major changes to his personality. By changing the way he sits, letting him get himself into a hole during prep, teaching him how to avoid that hole in the future, and teaching him what it means to “win” the exchange (which is what he wants to do), you can make Joe’s arrogance look like confidence, and make his narcissism work for you. After all, one thing Joe definitely wants is to look good on the stand. Make sure he understands that following your instructions will make that happen.



First, teach Joe how to sit.

Most egotistical witnesses aren't narcissists, they are just very insecure people who try to look confident in all the wrong ways, and end up looking arrogant. If you have a witness who slouches back in his chair, seems defensive or abrasive, or has an attitude problem, sometimes all it takes to fix the attitude is to change the way he or she is sitting.

Teach Joe to lean forward (as opposed to against the back of the chair) with a straight back, and clasped hands resting on the table. This is a strong, available, and confident position. Mock jurors rate witnesses who sit in this position as more credible than witnesses who sit back in their chairs. This is true even if the person sitting back is sitting up straight, with good posture. This forward position should be “home base” – Joe can gesture from here, but always comes back to this position. Suddenly, Joe appears to be confident, but also helpful, open, interested and other-centered.

But there's a catch. Joe will need to be able to maintain this position for an extended period of time. He must be consistent throughout his testimony. If he sits this way on direct, but then regresses to his arrogant leaning-back position on cross, he'll do himself more harm than good. In addition to looking arrogant, he'll also look like he was acting on direct.

Unfortunately, this forward and upright position can put strain on a person's back and make one tend to slouch or fidget. To make it easier to maintain this posture, tell Joe to sit *far* forward on the front of his chair. This position does not feel natural – you are literally perched on the front edge of your chair – but it is comfortable. And, it will take the strain off Joe's lower back, and enable him to maintain this position for a longer period of time. He should maintain this position at all times during your prep sessions – this will make it a habit which Joe can rely on when the adrenaline starts flowing.

Remind him to maintain this position no matter what the examiner does. This will help to eliminate the nonverbal cues or “tells” that signal when the examiner has scored a point or otherwise made Joe feel uncomfortable.

NOTE: It is not enough to tell your witness what *not* to do. You must also tell him what *to* do. Give him active skills to solve the problems you observe. For example, if a witness tends to swivel in his chair or fidget with his feet, have him anchor both feet flat on the floor, or bring his feet further under the chair. Find what works to help him lock his legs in place, and make the position more comfortable.

Let him get himself into a hole during prep, and teach him how to avoid that trap in the future.

When you begin preparing the witness, remember that we learn and retain new information more effectively in an interactive session than in a lecture. This is especially true for Joe, since he already thinks he knows everything, and just tunes you out when you're trying to give him a lecture. You are better off skipping your usual laundry list of do's and don'ts, and getting right to practicing. When Joe gets himself into a huge pit, he'll be much more likely to listen to your helpful advice about how to get out of it, and to avoid it in the future. He'll also start to trust you to get him out of the next pothole he finds himself in.

Re-evaluate the notion of “winning.”

Remember the classic scene from *Raiders of the Lost Ark*, where the villain’s henchman swings his sword around in an elaborate show of skill, only to have Indiana Jones look at him, unholster his pistol, and take him down in a single shot? Don’t let your witnesses go into battle swinging madly with a sword only to get swiftly shot down. Arm them with the skills they’ll need to come through unscathed.

Avoid battles.

Many times, narcissistic witnesses are ineffective because they are trying to beat the examiner at her own game. They think they can “win” the exchange, or that they can outsmart or outmaneuver the examiner. They see it as a battle, but they don’t know what ammunition they really have: their ability to tell their truth with credibility. You must discuss with Joe what “winning” means in this context. If you’re preparing him for a deposition, let him know that he cannot win (in the traditional sense) the case in deposition, but he can certainly lose it. Let him know the reality: that it is not his time to tell his side of the story and that opposing counsel will not walk out of the deposition and say, “Oh, boy. We’d better settle this thing because we just don’t have a chance!” He should know that the best way to win at the deposition is to make opposing counsel leave the room with nothing except the knowledge that Joe will be a great witness at trial.

Practice makes (almost) perfect.

This is true of all witnesses: practice makes (almost) perfect. Lectures and explanations simply do not work to change behavior. Many witnesses are told to answer only the question they are asked, but few are taught how to do it. This is a difficult concept for many witnesses to master, especially Joe, who thinks he knows the best answer to every question already. They are told to be open and honest, to tell their story, but then they are told to keep their answers short. They are told to listen to the question and correct any misconceptions in the question, but then they are told not to argue with the examiner. This confusing information is even more frustrating to someone like Joe, who is used to being in charge. The best way to teach Joe how to handle this very unique experience is to have him practice answering questions over, and over, and over again.



The bottom line:

With an arrogant, narcissistic, or otherwise difficult witness, you should be doing very little talking during your prep sessions – it should be all about practice. Just let Joe do the talking; he’ll think he’s in control and all the while he’ll be learning how not to be a difficult witness.

Some practice elements for Joe:

- Teach him how to sit. Don’t forget to tell him WHY you want him to sit this way (“Jury research shows that witnesses who sit this way are rated much higher”).
- Don’t lecture him. Jump right into practice sessions. Stop when you need to, to discuss his testimony, your themes, etc., but then get back to the practice.
- Let him get himself into a hole, then stop and discuss what happened (“You can see how avoiding that answer gave opposing counsel the chance to repeat the question over and over again”), and how to avoid it next time (“Just answer confidently, ‘Yes, I did.’”).

- Remember to focus a lot of time on practicing cross examination. This is going to be Joe's Achilles heel, so spend a lot of time preparing him for it. Also don't forget to explain and practice re-direct. When he gets a feeling for being "beaten up" on cross, and then saved by you on re-direct, his faith in you will go up, and he will be less likely to fight you.
- Play to Joe's strengths. He is difficult because he is used to being in charge, and he is used to being right. Show him how he has control in this situation: by careful listening and short, concise responses.

*Lisa DeCaro [decaro@courtroomperformance.com] is a trial consultant and principal with Courtroom Performance, Inc., and co-author of *The Lawyer's Winning Edge: Exceptional Courtroom Performance*. She does primarily civil work and has worked in venues across the country. She specializes in witness preparation, complex litigation cases, and product liability defense. You can read more about Ms. DeCaro at her webpage [<http://www.CourtroomPerformance.com>].*

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The September edition of *The Jury Expert* unveils several firsts: our first reader-requested feature (on preparation of narcissistic witnesses); our first law student author (Jason Miller on buffer statutes); our first author from the Netherlands (Fredrike Bannink on solution focused mediation); our first article on training law students (the DePaul program); and our first Favorite Things (we couldn't choose just one). Help us stay fresh--send in your wishes for upcoming issues--what would you like to see? Tell [me](#)...we'll see if we can make it happen.

*Rita R. Handrich, PhD
Editor, The Jury Expert*



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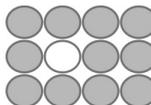
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Editors

Rita R. Handrich, PhD — Editor
EditorTJE@astcweb.org

Kevin R. Bouly, PhD — Associate Editor
AssocEditorTJE@astcweb.org

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