

Superior Court Hearings:

- o Witness list for Judge, Court Clerk, Court Reporter and Defense Counsel
- o Time Estimates on your motions and or orally.
- o Scheduling issues: Be upfront as soon as you know about them****
- o Apprise the Judge of any waivers and or stips.
- o Tell your clerk your approximate # of stips and when you will be introducing the majority of them.
- o Submit 402 motions in writing along with jury instructions and verdict forms at the beginning of the trial.
- o Talk to colleagues about what judges and clerks expect.

Voir Dire

- o You have TIME!!!! So take it.
- o Your examples need to be more sophisticated than cookie crumbs, cherry pies or other simplistic examples.
- o If the crime is serious you want to be careful of using trivial examples as they devalue your case.
- o Current events and other serious crimes not charged in your case are good.
 - o C.C.P. 223
 - o "liberal and probing examination calculated to discover bias or prejudice with regard to the circumstances of the particular case or parties before the court."
 - o Prohibits the court from imposing "unreasonable or arbitrary time limits" or from establishing "an inflexible time limit policy for voir dire"

Protecting the Record:

- o Rules:
 - o **Capital cases:** everything is on the record, even scheduling. You need to know this in case you are asked to make an appearance on a capital case.
 - o **Life Cases:** summarize any discussions off the record of significance and put them on the record or ask the court to make a record.
