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Anatomy of Trial, A Trial
Skills Series: Part 2 –
Opening Statements

October 6, 2021

Materials by:
Andrew J. Smiley, Esq.



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APRIL 13, 2021 / "LITIGATING A PERSONAL INJURY CASE" SERIES, CLE EPISODES, SEASON 2, VIDEO EPISODES / 01:22:36

-Video Episode - Andrew discusses properly preparing and conducting depositions. 1.5 CLE credits.



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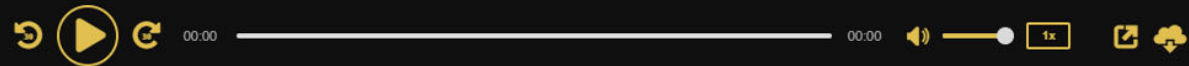
INTERVIEW

CHRIS PAIZ, ESQ

Season 2 – Episode 9: Racing Cars with Chris Paiz

JANUARY 26, 2021 / ADMIN / INTERVIEW EPISODES, SEASON 2, VIDEO EPISODES

-Video Episode - Andrew interviews Chris Paiz, a fellow lawyer and car racing enthusiast.



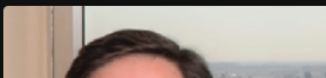
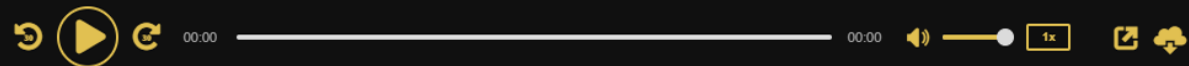
INTERVIEW

DA ERIC GONZALEZ

Season 2 – Episode 8: An Interview with Brooklyn, New York's DA Eric Gonzalez

DECEMBER 29, 2020 / ADMIN / INTERVIEW EPISODES, SEASON 2, VIDEO EPISODES

-Video Episode - In this week's episode, Andrew welcomes the District Attorney of Kings County in Brooklyn, New York, Eric Gonzalez.



Season 2 – Episode 7: Fighting Through the Dark

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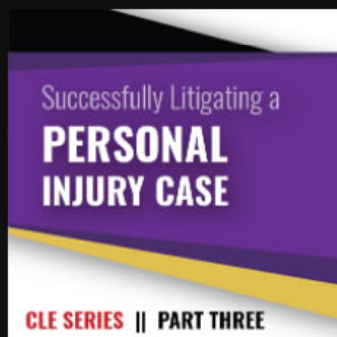
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CLE: How to Successfully Litigate a Personal Injury Case Series Part 4

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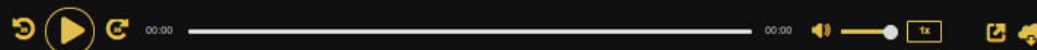
-Video Episode - Andrew discusses properly preparing and conducting depositions. 1.5 CLE credits.



CLE: How to Successfully Litigate a Personal Injury Case Series Part 3

MARCH 9, 2021 / "LITIGATING A PERSONAL INJURY CASE" SERIES, CLE EPISODES, SEASON 2, VIDEO EPISODES

- Video Episode - Andrew discusses adversaries, the preliminary conference, and the initial discovery. 1.5 CLE credits.





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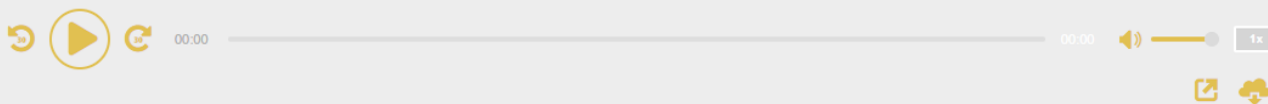
Andrew J. Smiley, Esq.

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CLE: Taking the “Umm...” out of SUM/UM Coverage

FEBRUARY 23, 2021 / ADMIN / CLE EPISODES, SEASON 2, VIDEO EPISODES / COMMENTS OFF



In Andrew's current CLE series, “How to Litigate a Personal Injury Case”, the topic of SUM and UM coverage has come up several times. In fact, it came up so many times during the Q&A sessions that the Mentor, Esq. worked with the Academy to do an entire CLE on the topic!

If you are listening and would like to answer the poll in the program for **1.5** CLE credits, you can do so by emailing the Academy at info@trialacademy.org.

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- › [CLE: How to Successfully Litigate a Personal Injury Case Series Part 2](#) February 9, 2021





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www.thementoresq.com

CURRICULUM VITAE

Education:

· Brooklyn Law School - Juris Doctorate 1996

Moot Court Honor Society - Vice President/Executive Board (Chair of Trial Division)
Moot Court Honor Society - Competitor - National Appellate Trademark Competition
Moot Court Honor Society – Coach, National Trial Team – Regional Champions
CALI Excellence For The Future Award - Advanced Legal Research
Judge Edward and Doris A. Thompson Award for Excellence in Trial Advocacy

· Tulane University, New Orleans, LA - Bachelor of Arts (Honors, Psychology) 1993

Professional:

· *Smiley & Smiley, LLP*

Managing Partner & Senior Trial Attorney, January 2001 - present

Associate, June 1996 - December 2000

Law Clerk, September 1993 - June 1996

Major verdicts and settlements in plaintiffs' personal injury, medical malpractice and wrongful death litigation.

Andrew J. Smiley, Esq. *Curriculum Vitae*, Page 2

· *Adjunct Clinical Instructor of Law - Brooklyn Law School, Trial Advocacy Program (1998-2004)*

· *New York “Super Lawyer”*

2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021

· Bar Admissions:

- The United States Supreme Court
- New York State Courts
- United States Eastern District, Southern District & Northern District of New York
- United State District Court of Vermont.

Organizations/Affiliations:

· New York State Academy of Trial Lawyers

- Immediate Past President (May 2018- May 2019)
- President (May 2017 – May 2018)
- President-Elect – (April 2016- May 2017)
- Vice President – 1st Dept. (July 2013-May 2016)
- Executive Committee (May 2019 – present)
- Board of Directors (2013- present)
- Judicial Screening Committee (2013- present)

· New York City Trial Lawyers Alliance

- Chairman of Board of Governors (July 2017 – July 2019)
- President (July 2015 – July 2017)
- Vice President (June 2013 – July 2015)
- Treasurer (June 2011 – June 2013)
- Secretary (June 2009- June 2011)
- Board of Directors (2000-present)

· Judicial Screening Committee, Kings County Democratic Party (2013)

· New York State Bar Association

· Brooklyn Bar Association

- Medical Malpractice Committee
- Supreme Courts Committee

· The American Association for Justice

· American Bar Association

· Brooklyn Law School Alumni Association

· National Order of Barristers

· Friars Club - member

Andrew J. Smiley, Esq. *Curriculum Vitae*, Page 3

Continuing Legal Education (CLE) Presentations:

How to Successfully Litigate a Personal Injury Case Series - Part 2: Early Settlement, Jurisdiction, Venue & Commencing The Lawsuit, New York State Academy of Trial Lawyers, February 3, 2021

How to Successfully Litigate a Personal Injury Case Series - Part 1: Getting the Case, Investigation and Ready to File, New York State Academy of Trial Lawyers, January 6, 2021

Brick by Brick: Building a Personal Injury Practice, New York State Academy of Trial Lawyers, December 10, 2020

Working with Experts to Build Your Case, New York State Academy of Trial Lawyers, October 8, 2020

Fitness Industry Liability: Gyms, Trainers and Waivers, The Mentor Esq. Podcast, September 8, 2020

Let's Make a Federal Case Out of It: Litigating Personal Injury Cases in Federal Court, New York State Academy of Trial Lawyers, June 9, 2020

Crisis Management - The Corona Virus Pandemic, The Mentor Esq. Podcast, April 9, 2020

Do You Have a Federal Tort Claims Act Case in Your Office, New York State Academy of Trial Lawyers, December 10, 2019

Auto and Truck Claims, Accidents and Litigation 2019 – Evaluating Damages and Use of Experts, New York State Bar Association, September 9, 2019

Thoughts and Strategies in the Ever-Evolving Product Liability Litigation – The Plaintiff's Perspective, The Defense Association of New York, March 12, 2019

Trial Techniques: Lessons on Dealing with Millennial Jurors; Summations; Requests to Charge and Post-Trial Motions, The Defense Association of New York, January 31, 2019

Trial Techniques: Interactive Lessons from the Plaintiff and Defense Perspectives, The Defense Association of New York, September 17, 2018

Punitive Damages – What to Plead, What to Prove: Medical Malpractice, New York State Academy of Trial Lawyers, June 8, 2017 & June 21, 2017

Presenter on Evidence, *2016 Annual Update, Precedents & Statutes for Personal Injury Litigators*, New York State Academy of Trial Lawyers, September 30, 2016

Andrew J. Smiley, Esq. Curriculum Vitae, Page 4

Continuing Legal Education (CLE) Presentations Continued:

Medical Malpractice in New York: A View from All Sides: The Bench, The Bar and OCA, New York State Bar Association, October 11, 2015

Effectively Using Experts in Personal Injury Cases, Lawline, October 8, 2015

Killer Cross Examination Strategies, Clear Law Institute, April 21, 2015

Powerful Opening Statements, Clear Law Institute, January 13, 2015

The Dram Shop Law: New York Liquor Liability, Lawline.com, November 20, 2014

Killer Cross Examination Strategies, Lawline.com, November 20, 2014

Trial Techniques: Tricks of the Trade Update, Lawline.com, October 14, 2014

Personal Trainer Negligence Update, Lawline.com, October 14, 2014

Trial Techniques – Part 2: Cross- Examination & Closing Arguments, Brooklyn Bar Association, May 15, 2014

Trial Techniques – Part 1: Jury Selection, Opening Statements & Direct Examination, Brooklyn Bar Association, May 7, 2014

Health, Fitness & Adventure Sports Liability, New York State Bar Association, August 1, 2013

Direct Exams: How To Make Your Witnesses Shine, New York State Academy of Trial Lawyers, May 6, 2013

Opening Statements: A Recipe for Success, Lawline.com, August 7, 2012

“You Had Me at Hello”: Delivering an Effective and Powerful Opening Statement, New York State Academy of Trial Lawyers, April 1, 2012

Preparing the Construction Accident Case, New York County Lawyers Association, March 26, 2012

The Nuts and Bolts of a Trial, New York State Academy of Trial Lawyers, October 24, 2011

Personal Trainer Negligence, Lawline.com, March 22, 2011

Effectively Using Experts in Personal Injury Cases, Lawline.com, May 4, 2011

Andrew J. Smiley, Esq. Curriculum Vitae, Page 5

Continuing Legal Education (CLE) Presentations Continued:

Trial Techniques: The Tricks of the Trade, Lawline.com, February 16, 2011

Practice Makes Perfect: Learn to Practice Like a Pro, Lawline.com, January 18, 2011

Jury Selection 101, New York State Academy of Trial Lawyers, December 14, 2010

Practical Guidelines for Getting Items into Evidence, Lawline.com, March, 2010

Winning Your Case: Trial Skills that Count, Lawline.com, August 21, 2009

Television Appearances – Legal Commentary:

Fox News Channel

- The O'Reilly Factor
- What's Happening Now with Martha McCallum
- America's News Room
- Fox & Friends
- Fox Business Channel
- Neil Cavuto
- Money with Melissa Francis

CNN -Anderson Cooper 360

ET – Entertainment Tonight

Bloomberg TV

Headline News

Tru TV

Court TV

The Morning Show with Mike and Juliet

Interests, Hobbies:

Tennis, Porsche Club, Sim Racing, Yoga, Cooking

ANATOMY OF A TRIAL

PART 2

OPENING STATEMENTS

There are two keys to delivering a powerful opening statement. The first, and most important, is *preparation*. The second is *presentation*.

You should certainly spend the majority of your time on the preparation aspect of your opening statement. In the world of trial practice, my motto is “preparation, preparation, preparation!” If you spend the time necessary to prepare your opening, the presentation will naturally follow.

So, where to begin? I start preparing my opening statement from the outset of the case. Each case has its own strengths and weaknesses, and it is important to recognize the strengths and weaknesses and think about how you can best convey them to a judge or jury. Many cases have unique aspects that can set a tone or theme for your opening statement. As your case progresses through discovery, with every bit of evidence that is uncovered, it is important to make a mental note and, preferably, a written note, of what you plan to say in your opening to frame the case on *your terms*. One of the most important reasons for delivering a powerful opening statement is to truly make a statement about your case. To set the tone and frame the issues as you want the jury to see them. If you want the jury to believe that your case looks like the color pink, then you need to give them a pink lens to view the evidence through.

Once you have all of the ideas in your head and the notes written down, you should find a quiet place and time to sit down at a table with your entire case file. Do not do this at your desk during normal business hours where you are likely to be interrupted by others in the office, phone calls and emails. I usually lock myself in my conference room and

advise everyone not to interrupt me or I work at home at a time when nobody is around to interrupt me.

Next, take out paper and a pen/pencil or sit down at your computer/laptop if you prefer to type rather than write. My personal preference is to use a legal pad, a black pen and a red pen. Then start free writing whatever comes to mind about your case. In a few paragraphs, write out an overview of your case (how would you explain your case to some family members at the dinner table?). Then write out sections on liability and damages. Feel free to cross things out, circle or otherwise highlight important words, phrases and points. I am a big fan of writing phrases in caps and underlining them with a red pen (i.e. THIS NEVER SHOULD HAVE HAPPENED BUT FOR THE NEGLIGENCE OF THE DEFENDANT!).

After your first round of free writing, you will feel better about knowing what you want to say in your opening. Then you just need to organize your notes into an outline that you can use at the time of your opening. In the outline included with these materials, I provide a format (see Outline II f.) for your opening. You should write or type out your outline in big letters or big font and be generous with the spacing so that you can easily refer to the outline without having to spend time reading it. The outline will serve as your crutch or safety net during your opening to help you stay on track with your presentation.

Once you have completed your free writing and outline you can begin to prepare the actual presentation and delivery of your opening. This is the time to start talking out loud, in the shower, in front of a mirror, walking down the street, or wherever you desire. It is important to actually speak your opening statement before you do it for real in court. The way that I guarantee a good start to my opening, without any stumbles or drawing any blanks, is to always start the same way with “May it please the court, Judge Jones, counsel, members of the jury, good afternoon, my name is Andrew Smiley, and I represent the plaintiff, Jane Smith.”

Make sure you look good. Wear your nicest outfit for your opening. Button up. Remove all items from your pockets. Turn off and put away your cell phone. Make sure nothing is in your hands – no pen, no pad. Leave your outline on counsel table, the podium or the ledge in front of the jury box. Speak slowly and clearly. Change your inflection when needed to highlight a point. I like to be demonstrative, but that is my style. If you usually use your hands when talking then feel free to do the same in your opening. Be yourself. We all have our own style and you won't do well if you try to use someone else's style. Make eye contact with the jurors. Don't get too close and invade their space. If you lose your train of thought or just want to take a moment to regroup, go and have a sip of water and look at your outline. This will only take a few seconds. Then get back to it. When you are finished, after the conclusion of your opening say "Thank You" – and sit down.

If you have properly prepared and presented your opening statement, you will be off to a powerful start. The trial will begin and be framed on *your terms*. Good luck!

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OPEN

May it please the Court ...

I am

I represent π , OSCAR A.

This is a case where the Δ , Carol Lynch failed to use reasonable care and failed to pay attention while driving her car on a September Saturday in 2017

- As a result of her failure to use reasonable care and pay attention that day, she struck ~~the plaintiff~~, OSCAR while he was riding on his motorcycle

- knocking him to the ground and ~~causing~~ ^{motorcycle landed on off his leg} him to be seriously injured and skidded

propelling him into A. forwards

skid while his leg trapped beneath the motorcycle

The 1st witness you will hear from is OSCAR A.

Birthday Yesterday!

- You will learn that OSCAR is a 62 y.o. man who is originally from Chile - South America he moved to the U.S. many years ago ~~and~~ for the last 20 years he has lived and worked here in Queens as a handyman for a large apt. complex. Hyde Park Queens

U.S. Citizen

2001 Harley Dyna Super-Glide

- 19 years ago he purchased his ^{prized possession} Harley Davidson motorcycle. A motorcycle he has taken great pride in. Only takes out on special occasions when the weather is good

- Takes motorcycle to charity events and fundraisers to help raise money for cancer and children.

Open
(C)

D/A

Beautiful day

Learn that on Saturday, September 23, 2017

Oscar was on his way to one of these benefits - to raise money to help Autistic children

to get to benefit he had to ~~get~~ ride from his home ~~at~~ 138m St in Queens to the GCP Westbound

The route brought him to the intersection of LNP & the GCP Service Road

Learned that while travelling on LNP as he approached Int, he brought his Harley to a ^{brief} stop then, when not seeing any oncoming traffic towards him, he turned left on GCP Service Road

- He wasn't speeding - taking it easy

going about 20 mph

Looking ahead while going straight ~~on~~ GCP Service Rd towards entrance to GCP

- Felt a hit on the back right side of his Harley then another hit which knocked him and his Harley over where he crashed to the ground under his Harley and skidded until he came to a stop with entire left of Harley on top of his leg

- Looked back from position on ground

and saw a Black Audi ^{that hit and knocked him to}

Open
(3)

The Defendant

The Black Audi, you will know
was ~~being~~ being driven by
owned by a man Name Phillip Lynch
but on this day it was being
driven by his wife, Carol Lynch

Evidence will show that A, Carol Lynch
was ^{100%} responsible for this accident
b/c she failed to pay attention
USE REASONABLE CARE
while driving Audi

evidence will show that she was
(1) driving too fast
(2) not paying attention and failed
to see what was there to
be seen ahead of her while
while driving
~~OSAC~~

OSAC did nothing wrong

Closing

Open
(4)

I am confident that if you pay
close attention to the evidence
presented at this trial

you will ~~agree~~ conclude that
the A was not using
reasonable care and
failed to pay attention

Cause of the Accident
on 9/23/17

Thank you!

We will present evidence for you
to evaluate in this case about
the accident and the A's failure
to use REAS. CARE & failure to
pay attention.

OSCAR → Photos of Accident, Scene
Hardy & Audi
COCO → pay attention to her description of
events and whether they changed
since the day of accident
until today

A Defense
not correct

~~OSCAR~~ I think the evidence
will show that she has
changed her story

Good's husband → here what she told him
Accident Reconstructionist → Diagram and scientific
explain how accident
occure
inspected Hardy
confirmed damage from A's front bumper

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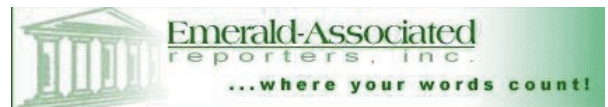
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