

HOW TO GET A BLOW-UP OF A DIAGRAM BEFORE THE JURY:

Option 1: At the start of trial, inform the judge that you plan to use enlargements of several documents so the jury can see them. Produce the document and the original and ask if either the court or the opponent would like to compare them or has any objection to your using the enlargements.

Option 2: During direct examination, after you have introduced the original, pick up the enlargement, show it briefly to the opposing party, then turn to the judge and say, “

Your honor, I intend to ask the witness some questions about particular parts of this exhibit which may be too small for the jury to see. I have prepared an enlargement of plaintiff's exhibit 1, which I have marked as plaintiff's exhibit 1-A for illustrative purposes only. May I publish exhibit 1 to the jury by displaying the enlargement on an easel and having the witness point out certain features of it?

Option 3: After you have introduced the original:

Q. May I approach the witness again?

[show the enlargement to opposing counsel]

Q. Handing you plaintiff's exhibit 1-A for identification, will you examine it?

Q. Is this a fair and accurate enlargement of the [report/record/letter/photo] I just showed you?

Q. I am going to ask you some questions about particular parts of the exhibit. Will this enlargement help you explain some of its details?

Your honor, I move plaintiff's exhibit 1-A into evidence for illustrative purposes.