

HANDLING EVASIVE WITNESSES ON CROSS

(In order from first to last)

1. [Repeat the question until the witness answers it].
2. "Maybe I wasn't clear.... [repeat question]."
3. "So your answer is Yes?"
4. "Please just answer the question Yes or No. [Repeat it]"
5. "Is that a long-winded way of saying Yes?"
6. "Would your honor instruct the witness to just answer the question and not volunteer additional testimony?"
7. "Would your honor admonish the witness again?"
8. "I move to strike the volunteered testimony as unresponsive." "Let me ask you again: ..."