

IMPEACHING A WITNESS WHO CLAIMS TO HAVE FORGOTTEN SOMETHING HELPFUL TO YOU.

---

Q. ISN'T IT TRUE THE LIGHT WAS RED

A. I'M NOT SURE.

Q. IN OTHER WORDS, YOU CANNOT REMEMBER WHETHER THE LIGHT WAS RED?

A. THAT'S RIGHT.

Q. IS YOUR MEMORY ABOUT THIS INCIDENT UNRELIABLE?

A> IF WITNESS ANSWERS "YES," MOVE ON. THE IMPEACHMENT IS DONE.

A> IF WITNESS ANSWERS "NO", THEN YOU CONTINUE.

Q. SO IT'S ONLY THE COLOR OF THE LIGHT YOU CAN'T REMEMBER?

A. YES

Q. YOU REMEMBER OTHER FACTS PRETTY WELL?

A. YES

Q. WHEN YOU ANSWERED THE OTHER LAWYER'S QUESTIONS ON DIRECT, DID YOU REMEMBER THOSE FACTS PRETTY WELL?

A. YES

Q. SO IT'S ONLY THE FACTS FAVORING OUR SIDE THAT YOU'VE FORGOTTEN?