



J. Michael Coleman

**Shareholder – Hagwood
and Tipton, P.C.**

- **Trying cases for 20 years**
- **Vice-President of Mississippi Defense Lawyers Association**
- **Dirt Bike Racer**

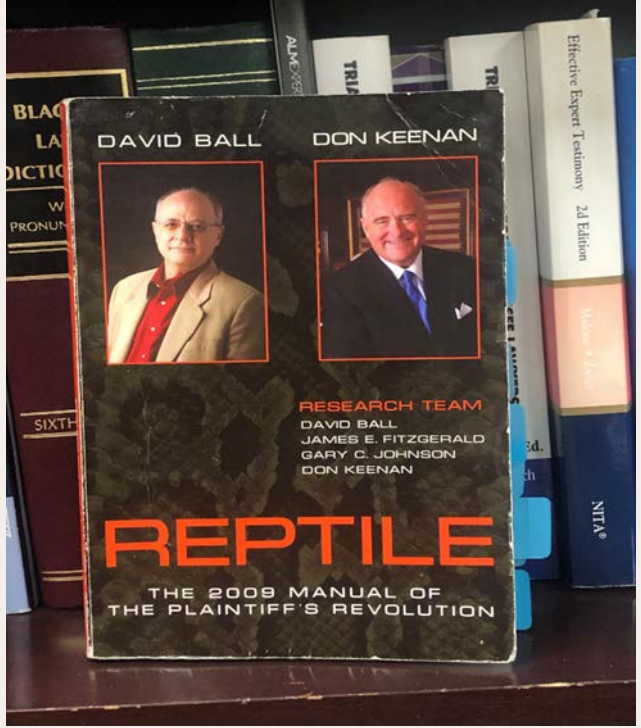
VIRTUAL



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Lizard-Proof Your Witnesses





Teach Them the Game

- Give them credit – they will play well
- Give them a safe space
- Identify the grey areas
- Teach them wordplay



Identify Triggers

- They know their business
- They do not know the law
- Teach the law and let them ID the triggers
- Fill in the holes



Practice and Film It

- Prepare a mock depo
- One million words
- Let them correct their failures
- Help them fill in the holes
- Run it again



