



THE FLORIDA BAR

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Certificate of Accreditation for Continuing Legal Education

227809
Tampa Bay Trial Lawyers Association
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Tampa, FL 33623-6091

May 28, 2015

Reference Number: 1503855N
Title: How To Maximize Recovery During Closing Argument
Level: Intermediate
Approval Period: 06/16/2015 - 12/16/2016

CLE Credits

General	2.5
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Certification Credits

Civil Trial	2.5
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Please provide the attendees the above reference number so they may go online to www.floridabar.org to report their completion of this program.

How to Capsulize your Closing Argument:

1. Power of the Jury.
2. Judges Without Robes
3. Nature of the Verdict – One Day in Court.
4. Jury's Instructions – Importance Stressed
5. Sympathy
6. Challenging the Defense to come up with a Figure. BE CAREFUL!
7. Tipping the Scale of Justice. Civil Burden vs. Criminal Burden.
8. Negligence Defined for the Jury.
9. When Plaintiff has been drinking.
10. Case where Plaintiff is a Minor.
11. Value of Life- Unique Injury- Destroyed Rembrandt-Neck Injury Case.
12. Ten Percent Disability Significant.
13. Aggravation of Pre-existing Condition. Law protects the weak.
14. Subjective Symptoms.
15. Pain has been described as a Window into Hell.
16. CME for Defense- Debunked.
17. Permanent Back Injury- They took away the Tools of his Trade.
18. Mortality Tables: 55 years.

The Most Common Pitfalls in Final Argument:

The "Golden Rule"

Insurance Coverage

Comment on facts/testimony not in evidence.

Mentioning the absence of a witness.

Attorney's opinions regarding the credibility of witnesses.

Improper remarks re: Opposing Counsel.

Settlements.