

9 TECHNIQUES For Controlling Difficult Witnesses on Cross-Examination

1

Repeat the question

Q: The car was red?
Q: The car was red?
Q: The car was red?

2

Repeat twice, then reverse

Q: The car was red?
Q: The car was red?
Q: The car was **NOT** red?

3

So, your answer to my question, (insert question), is Yes/No?

Q: The car was red?
A: (Non-responsive answer)
Q: So, your answer to my question, "the car was red," is yes?

4

Make the Question True or False

Q: The car was red?
A: (Non-responsive answer)
Q: True or false, the car was red?

5

Perhaps I did not make myself clear

Perhaps I did not make myself clear.
My question was, (insert question).
Q: Please answer that question.

6

Did you hear the question I asked?

Q: Did you hear the question I asked?
Q: What was my question?
Q: What is your answer to that question?

7

There are lots of things you want to tell the jury?

When they ramble, say, there are lots of things you want to tell the jury. But, for now, please answer my question. Repeat the question.

8

Does something prevent you from answering yes or no to my question?

When they are non-responsive, ask, does something prevent you from answering yes or no to my question? Repeat the question.

9

Are you finished yet?

When they ramble, ask, are you finished yet?
Then, repeat the original question.

