

# OPENING STATEMENTS AND CLOSING ARGUMENTS



*How Far Can You Go?*

By: Frank Guerra, IV  
Alex Work

WATTS | GUERRA <sup>L</sup><sub>L</sub><sub>P</sub>

## OVERVIEW

*The Audience and Jury Selection*  
*The Laws of Primacy and Recency*  
*The Golden Rule*  
*Reaching Your Audience*  
*The Do's and Don'ts of Opening  
Statement and Closing Argument*

# JURY SELECTION

## Who Is Your Audience?



# Age Distribution of Jurors

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|                       |                                |                        |                      |                        |                        |                            |
|-----------------------|--------------------------------|------------------------|----------------------|------------------------|------------------------|----------------------------|
| MCEVOY<br>GERALD J 60 | LETH<br>JENNIFER 73            | JEN<br>JON I 67        | BLF<br>JOHN A 64     | KENDALL<br>DAVID E 63  | ALLEN<br>CHARLOTTE 63  | ROBINSON<br>LIVON 60       |
|                       | ABDUL-HAKR<br>INSIBRAH SAID 60 | ARNOLD<br>JANET SUE 57 | FLEEMAN<br>MARY D 57 | WARNER<br>LYNNETT G 56 | HARDON JR<br>LEON M 56 | HAROLD<br>BILLY DARLENE 56 |
|                       |                                | CHACON<br>JORDIN 55    | SHABRAK<br>LEESA 54  | KEEBLE<br>MICHAEL L    |                        | MILLER<br>SHEILA DRAKE 52  |
|                       |                                |                        |                      |                        |                        | HANDLEY<br>DEBORAH JEAN 52 |

# Venire Panel Seated Behind Bar

JACKSON COUNTY  
DIVISION 16  
VOIR DIRE

|          |          |          |          |          |          |          |          |          |          |          |          |
|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| 43<br>26 | 44<br>25 | 45<br>24 | 46<br>23 | 47<br>22 | 48<br>22 | 49<br>34 | 50<br>46 |          |          |          |          |
| 31<br>40 | 32<br>39 | 33<br>39 | 34<br>37 | 35<br>35 | 36<br>34 | 37<br>34 | 38<br>30 | 39<br>28 | 40<br>28 | 41<br>27 | 42<br>26 |
| 19<br>49 | 20<br>47 | 21<br>46 | 22<br>46 | 23<br>46 | 24<br>43 | 25<br>43 | 26<br>43 | 27<br>42 | 28<br>42 | 29<br>42 | 30<br>41 |

Plaintiff's Exhibit  
**703**

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