

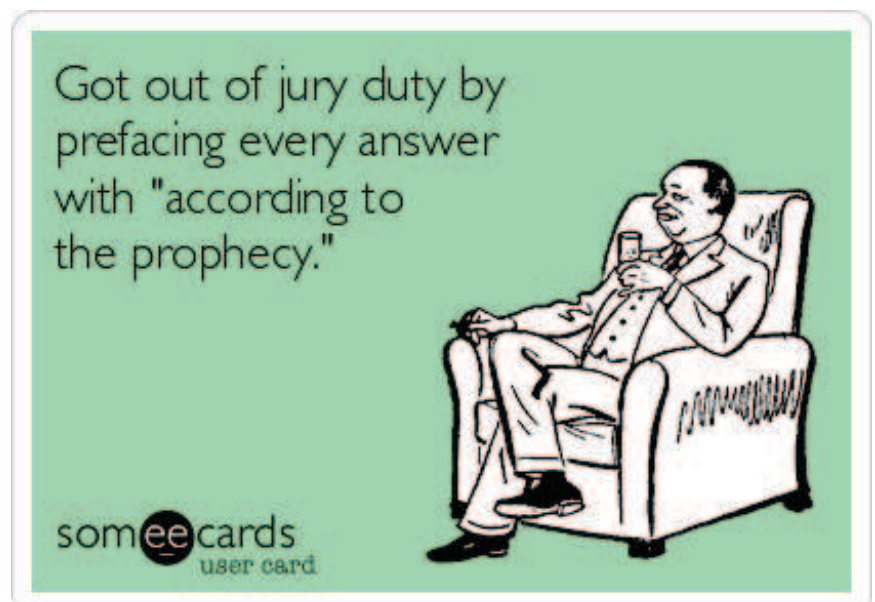


For the Plaintiff: **Rachel Ambler**
AMBLERLAW, PLLC
Odessa, Texas
Rachel@RachelAmbler.com

Plaintiff & Defense Perspectives on Damages

For the Defense: **Denis Dennis**
KELLY, MORGAN, DENNIS, CORZINE & HANSEN, P.C.
Odessa, Texas
DDennis@KMDFirm.com

Voir Dire Issues



She Said:

The Plaintiff's Perspective

- Damages and closing argument start in voir dire.
- Little visible damage doesn't mean the body didn't take a hit.
- Throw them a lifeline—educate them all.

Voir Dire

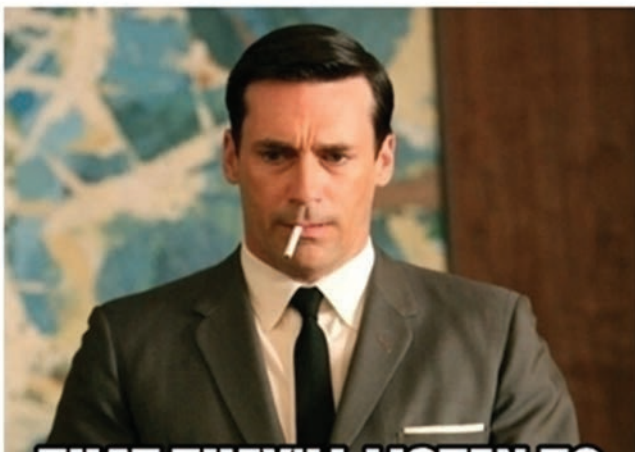


“I don’t know what you did or didn’t do, but I do know that I can’t know what you know or you don’t know. You know?”

he Said:

The Defense Perspective

PEOPLE WANT TO BE TOLD WHAT TO DO SO BADLY



THAT THEY'LL LISTEN TO ANYONE.

Voir Dire

- Let them know they will hear evidence regarding damages.
- Introduce idea plaintiff may have suffered no injuries.
- Tread lightly suggesting no damages with a clearly objective injury.

The Damages Issues



Property Loss

Property Loss

- A) Diminished Value
- B) Reasonable Repair Costs

Loss of Use

My recent car accident was far less traumatic than dealing with my insurance company over the car accident claim.



your  cards
someecards.com

Find the full text of this and thousands of other resources from leading experts in dozens of legal practice areas in the [UT Law CLE eLibrary \(utcle.org/elibrary\)](https://utcle.org/elibrary)

Title search: She Said, He Said: Plaintiff and Defense Perspectives on Damages

Also available as part of the eCourse

[Car Crash Trial Tactics 2020: Affidavits, Deposition and Cross-Exam, Medical Records and more](#)

First appeared as part of the conference materials for the
2020 Car Crash Seminar session

"She Said, He Said: Plaintiff and Defense Perspectives on Damages"