

Trial Notebook Checklist

1. Copy or notes of your facts sorted by date or similar document.
2. Copy of all relevant, applicable law, court rules of procedure and rules of evidence.
3. Opening statement outline or script.
4. Master list of all pre-marked exhibits and all pre-marked exhibits in proper format.
 - a. Statements
 - b. Records
 - c. Reports
 - d. Emails
 - e. Texts
 - f. Pics, screenshots
 - g. Audio, video
 - h. Diary, journal
 - i. Timelines
 - j. Misc.
5. Master list of your witnesses with contact information and their evidence.
6. Objection list/evidentiary foundations.
7. Witness Questions:
 - a. Direct examination
 - i. Questions written out or closely structured examinations for each witness with any documents you intend to exam them on plus an extra copy of the document. One for you and one for the witness. Copies of the document for other counsel and the court if it's not already a pre-marked exhibit.
 - ii. Copies of subpoenas with return of service
 - b. Cross examination
 - i. Questions written out or closely structured examinations for each witness with any documents you intend to examine them on plus an extra copy of the document. One for you and one for the witness. Copies of the document for other counsel and the court if it's not already a pre-marked exhibit.

8. Memorandum of law on any potential evidentiary issues or nuanced substantive law issues that you expect. Copies of the relevant cases with each memo.
9. Master checklist of issues required to prove your case and disprove the other party/opposing counsel.
10. Closing argument outline.
11. List of all potential rebuttal witnesses.
12. Proposed findings, order.