

## INTRODUCTION OF EXHIBITS

**These instructions are for use of an exhibit that has not yet been admitted into evidence. Once an exhibit is admitted into evidence, it may be used by any counsel with any witness by following only the first two steps.**

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1. **ASK PERMISSION TO APPROACH:** “Your honor, may I approach the witness with what has been marked for identification purposes as Exhibit No. \_\_\_?”
2. **SHOW EXHIBIT TO OPPOSING COUNSEL**
3. **ASK WITNESS TO IDENTIFY EXHIBIT:** “I now hand you what has been marked for identification as Exhibit No. \_\_. Would you identify it please?”
4. **ASK QUESTIONS TO LAY FOUNDATION:** Establish what witness has to do with document, relevance of the exhibit, any background needed for hearsay purposes
5. **OFFER EXHIBIT INTO EVIDENCE:** “Your Honor, we offer Exhibit No. \_\_ into evidence.”
6. **RESPOND TO ANY OBJECTIONS:** Court will ask opposing counsel if there are any objections. If no objections, exhibit will be admitted. If there is an objection, you will need to respond in support of admissibility when asked by the Court.
7. **ASK QUESTIONS ABOUT ADMITTED EXHIBIT:** Once the exhibit is admitted, you may freely ask the witness questions regarding the exhibit or read from the exhibit
8. **PUBLISH THE EXHIBIT:** “Your Honor, may I publish Exhibit No. \_\_ to the jury?”  
Once permission granted, hand exhibit to the jury.