



**Litigation
Paralegals, LLC**

Big Firm Resources - Small Firm Cost

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With more than 20 years experience in the trenches of heavy litigation and trial team work as a senior litigation paralegal in top tier law firms, Keith Slyter, Principal at Litigation Paralegals, LLC is proud to share with you....

**What Does Every
Litigation War Room
Need to be Successful**



We will be going to trial on your big case and we will need you to set up a war room...



Oh...and this case does not justify hiring a Trial Consultant...



You Google WarRooms-R-US



- 1) Verdix Legal...Darn...Trial Consultant
- 2) Barnes and Roberts...Darn...Trial Consultant

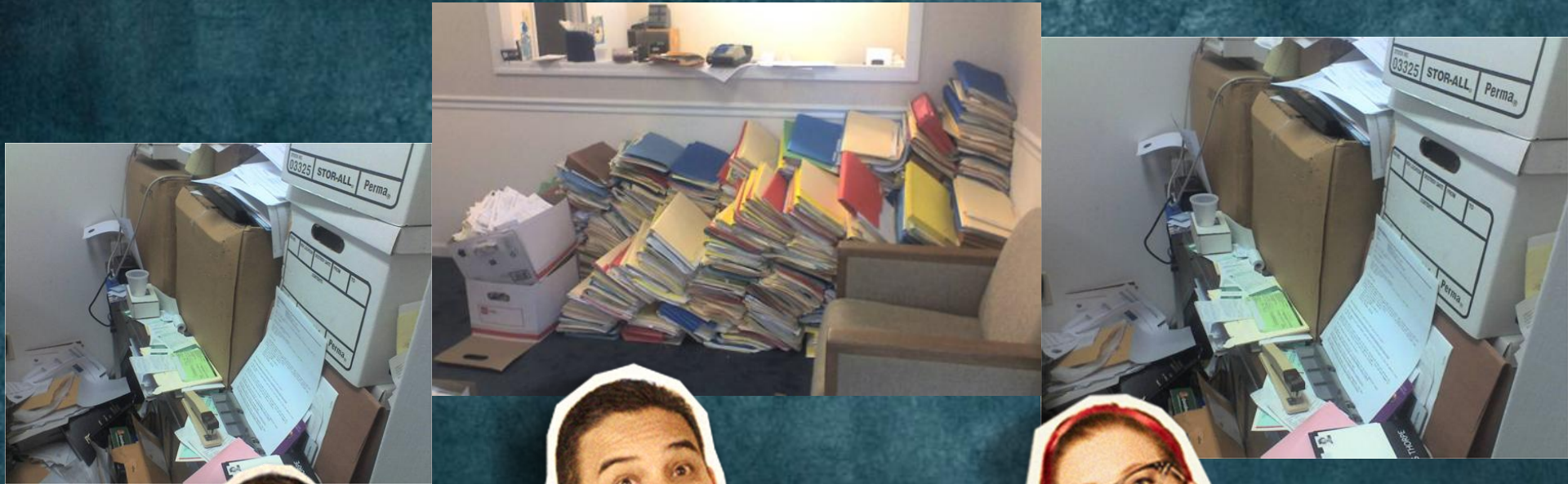
VISIONS OF WAR ROOMS

Dance in your head...



War Room at the Pentagon from Stanley Kubrick's **Dr. Strangelove**

WAR ROOM #3



Clean and Organized is the Goal



A main priority of a war room is to provide all the comforts of home...or at least a conference room

5

RULES

FOR CREATING
SUCCESSFUL LITIGATION
WAR ROOMS



1

LOCATION

LOCATION

LOCATION

Location is important



Too far away from the court...
not good...



Too far away from sleep...
not good...



Find out what is close



- Office Supply
- Copy shop
- Dry cleaners
- Restaurants
- Local vendors
- Parking
- Post office
- Hotels
- Transportation

FINDING LOCAL RESOURCES



<http://lawfirmresources.org/>



<http://www.hg.org/>



<http://lawvendors.com/>



<http://www.e-legaltechnology.org/>



DEVELOP
PLAN
AND
REVIEW

BLAH

blah
blah
blah

BLAH

4 BLAH

BLAH

Blah BLAH

BLAH

blah

BLAH

BLAH

BLAH

blah

B

BLAH

BLAH

BLAH

blah

Blah

Blah

BLAH

BLAH

blah

BLAH

Checklist for both In-Town and Out-of-Town Trials

WAR ROOM SETUP

- Furniture
- Conference tables and chairs
- Shelving
- Office supplies

ELECTRONIC

- Printer
- Fax
- Scanner
- Hubs
- On-site server
- Laptops / workstations
- Internet access
- Removable media
- Access to firm email and case databases
- Phones – hardwired and mobile
- Copy of electronic data – don't try to work over the internet

VENDORS

- High volume copy service

- Demonstrative exhibit vendor/ visualization / animation
- Local staffing
- Local restaurants
- 24 hour pharmacy
- Courier service
- Dry cleaner

OTHER FACTORS

- Proximity to courtroom / hotel
- Designate responsibilities
- Living accommodations for trial team, witnesses, consultants
- Transportation to and from the airport and to and from the trial
- List of major equipment
- How to get the equipment back
- Have a Plan B
- Courthouse security and after hours access
- War room security and after hours access



WAR ROOM PLAN

What will the war room be used for during trial?

- Prepare witnesses?
- Plan next days events?
- Strategize?
- Copy and scan documents?
- Prepare exhibits?
- Eat lunch? And Dinner?
- Practice opening and closing statements?
- Practicing direct and cross-examination?

WAR ROOM PLAN

What are the space needs of the war room?

- How many people will be in the war room?
- How many workstations?
- How many power supplies?
- Who will be in charge of the war room?
- Will you have a trial consultant?
- Will the trial consultant operate in war room?
- Are you as the paralegal in charge of war room?
- Who will be running the equipment in war room?
- Who will be running the equipment in court?

THOUGHT

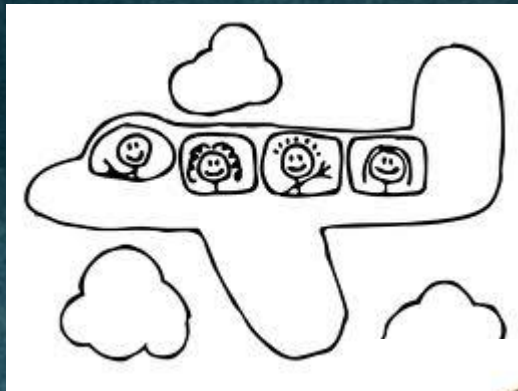


Please refer to Exhibit Number 46

WAR ROOM PLAN

Think about transportation:

- How will you get from hotel/war room to court?
- How will you get to airport?
- When is the last flight in and out?





LEARN TO
LOVE
CREATING
CHECKLISTS

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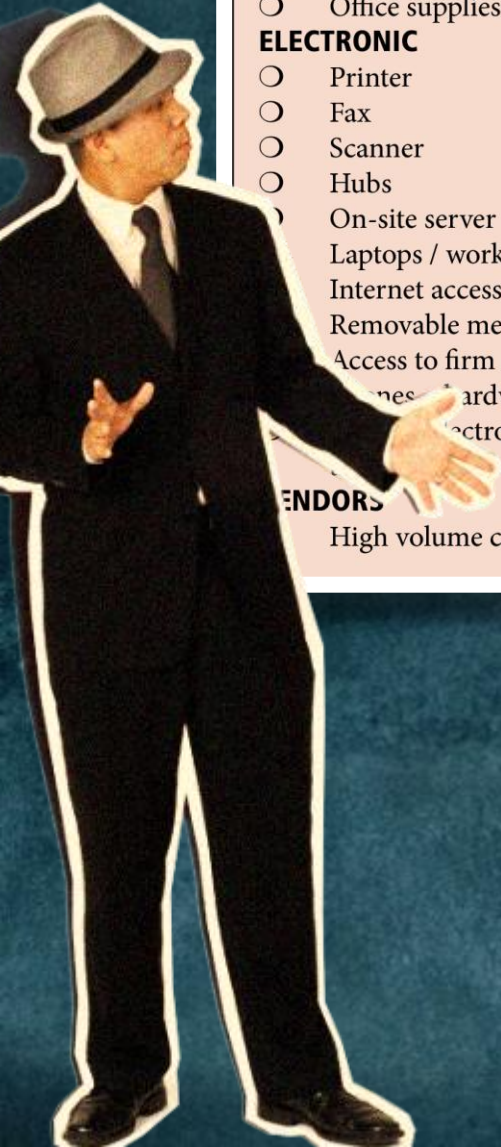
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THE PROCESS



Populate the
WAR ROOM
CHECKLIST



What do we need in our War Room?

WAR ROOM CHECKLIST

Check	Description	Details
Setup		
√	Furniture/Workstations	Folding Tables/Chairs brought from office
√	Shelves (for notebooks and office supplies)	Brought from Office
√	Conference Table	At Hotel
Technology		
√	High Speed Color Printer/Copier/Scanner	Rental or Bring from Office?
	Scanner (if separate from Printer/Copier)	Rental or Bring from Office?
√	Back-up copier/scanner	Rental or Bring from Office?
	E-Fax on everyone's computer	Have It Load and test
	On-site Server with entire database and mirror of firm drive, exhibits and productions	IT to set up and arrange
√	Laptops	IT to set up and arrange
	Internet access	Broadband cellular wireless network? T-1 line through hotel?
	USB Thumb drives and storage devices	IT
	Arrange and understand how to use VPN or remote access to log-in to the firms network when away from the office	IT
	Phones	Cell phones or dedicated line through hotel?
Vendor/Contact List		
	Local copy/scanning vendor	Phone, address and email
	Local restaurants	Phone, address, email and website
	Dry Cleaner	Phone and address
	Pharmacy	Phone and address
	Back-up support (attorneys, paralegals, staff)	Phone and email

WAR ROOM SUPPLY LIST

The easiest way to deal with the supply list is to number the boxes and put a description of the items in each box, for example:

Box No.	Description
1	Trial Supply List A to Z Tabs
2	Tabs 1-50 Collated tabs 1-100

Supplies should include the following::

Assorted labels and tabbies

A-Z Tabs

Batteries

Binders with vinyl window
(1", 1.5", 2", 3" and 4")

Box Cutters

Bubble Wrap

Calculators

CD Cases

CDs

Clips (Alligator)

Coffee Pot/Maker (very important!)

Collated Tabs 1-800

Cork Board

Dorm Style refrigerator

DVDs

Easels (more than one),

Easel Pads, colored markers

Envelopes

Favorite pens and pencils

FedEx/Overnight shipping supplies

Folding tables and chairs

Individual Tabs 1-50

Label Dividers

Legal Pads

Light bulbs for any desk lamps

Manila Folders

Mouse Pads

Packing Tape

Paper 3-Hole

Paper – Color Copy

Paper – Regular Copy

Paper Cutter

Paper hole punch (2 hole and 3 hole)

Pen/Pencil cups

Post it notes of all sizes

Red Wells (small and large sizes)

Regular Paper

Sharpie Markers

Small fan and possibly small heater

Snacks

Soda flavors that everyone enjoys

Staplers

Staples

Super Glue

Surge Protectors

Toner for any printers

Water

White board with dry erase markers

Wipes



5

TECHNOLOGY COURT & WAR ROOM





Courtroom Technology:

- Will you use an Elmo as priority?
- How many monitors are needed?
- Is there a projector and screen?
- What type of speakers will be used for audio?
- Will you have poster demonstratives?
- How will everything be organized?
- Did you bring the easel?



Courtroom Technology

- Will you use an Elmo as a change, we must first prioritize the things that will bring about the maximum impact
- Then we must organize scheduling resources that will support the practice
- Finally, we need to mobilize people to be able to take action and bring about that change



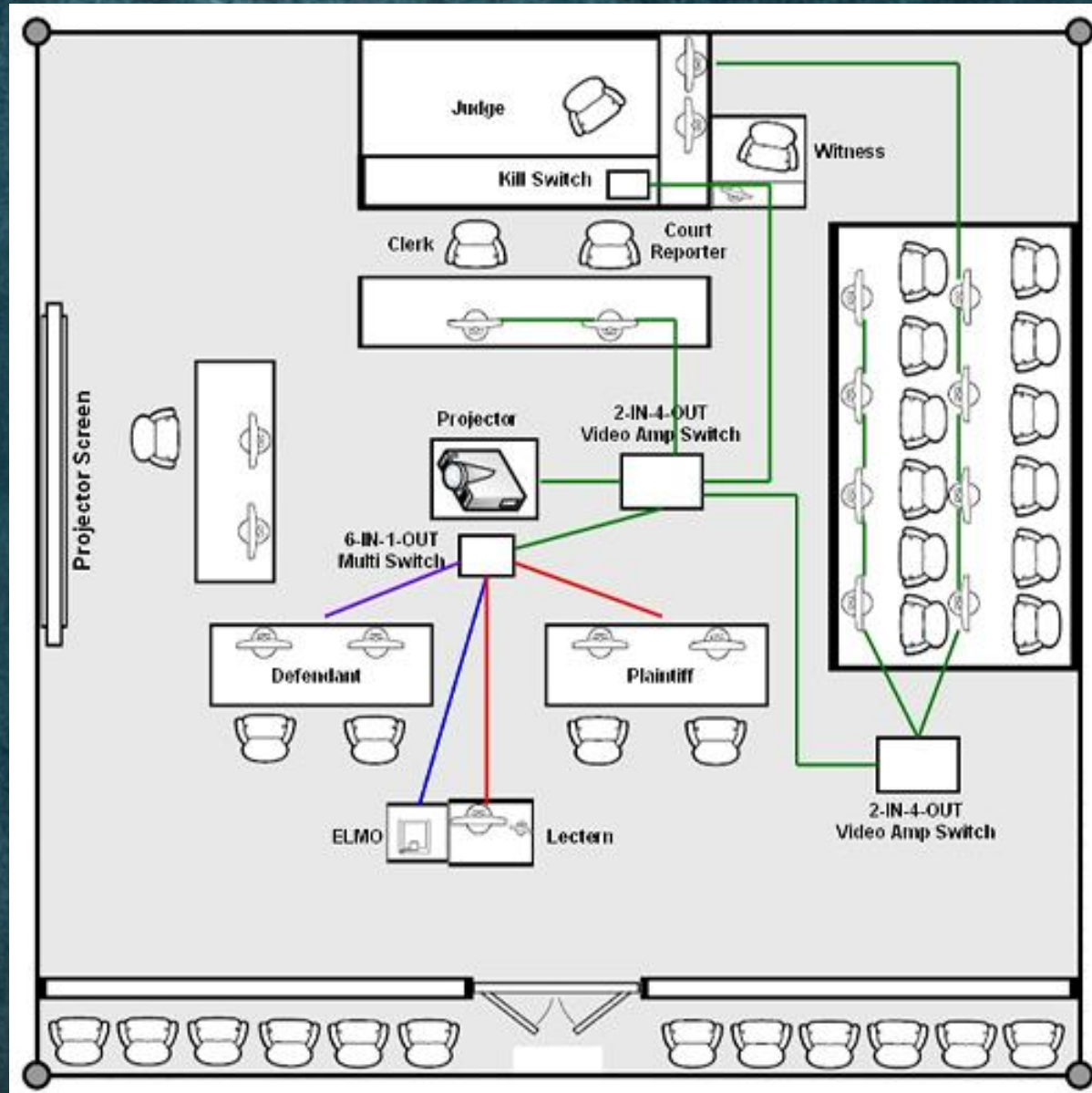
**It is important to become a litigation expert,
not just a technology expert**



The Hot Seat



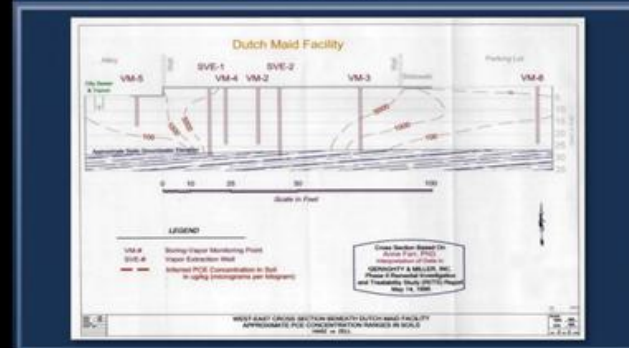
COURT SETUP



TRIAL DIRECTOR

Technology

Approximate PCE Concentration Ranges
in Soil Beneath Dutch Maid Facility



Demonstrative Exhibits



Q. Okay. Thanks. So is that your signature on the bottom right-hand corner of the application?
A. Yes, it is.
Q. And did you
20057

Deposition Video, Exhibit Callout



3D Animation, Video

TRIAL PRESENTATION

It is necessary to refer the results of the audit to
An audit of steps undertaken by an applicant in order to comply with the

- (8) whether the licensee has taken remedial measures with respect to the noncomplying act(s);
- (9) the evidence or nonexistence of previous violations by the licensee;
- (10) the degree of harm occasioned by the noncompliance; and

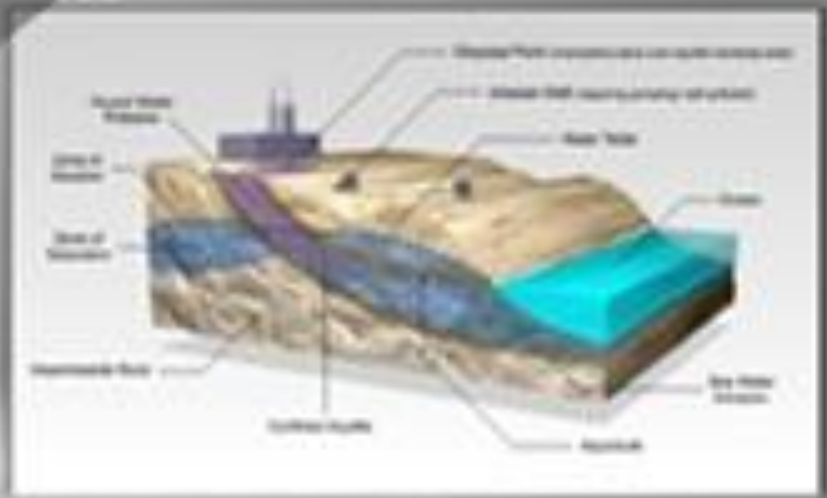
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and -- you would be certainly be affected in any way.
My job is to make sure, at any witness stand, and
posed to the questions that are good to a truthful
and forthright answer.

Now, I don't know what involving your
admission, but admission, whatever. It's
I pose questions. The didn't seem a
I understand I mistakenly assumed,
no questions, and I'll try and answer
ask.



TRIAL PRESENTATION

(a) The reports

(b) A document destroyed or any data

(c) Who orchestrated identify

9. Identify

10. Identify of existing

11. Identify or overtake commercial the subject

12. Identify

13. Identify

(a) Types

(b) Capabilities

(c) All tapes re-initialized or overwritten since commencement of this litigation and state the date of the occurrence.

Dated: August 30, 2007

*Mary Murrweather
Attorney for the Plaintiff, Infidel Tech.*

Page 1

Page 2

HIGHLY CONFIDENTIAL

Case item is not selected.

EXHIBIT

00:00:05

00:20:41

5: 01 THE VIDEOGRAPHER: Good morning.

5: 02 We're going on the video record at 10:50 a.m.

5: 03 My name is Keith Widenauer, and I'm a legal

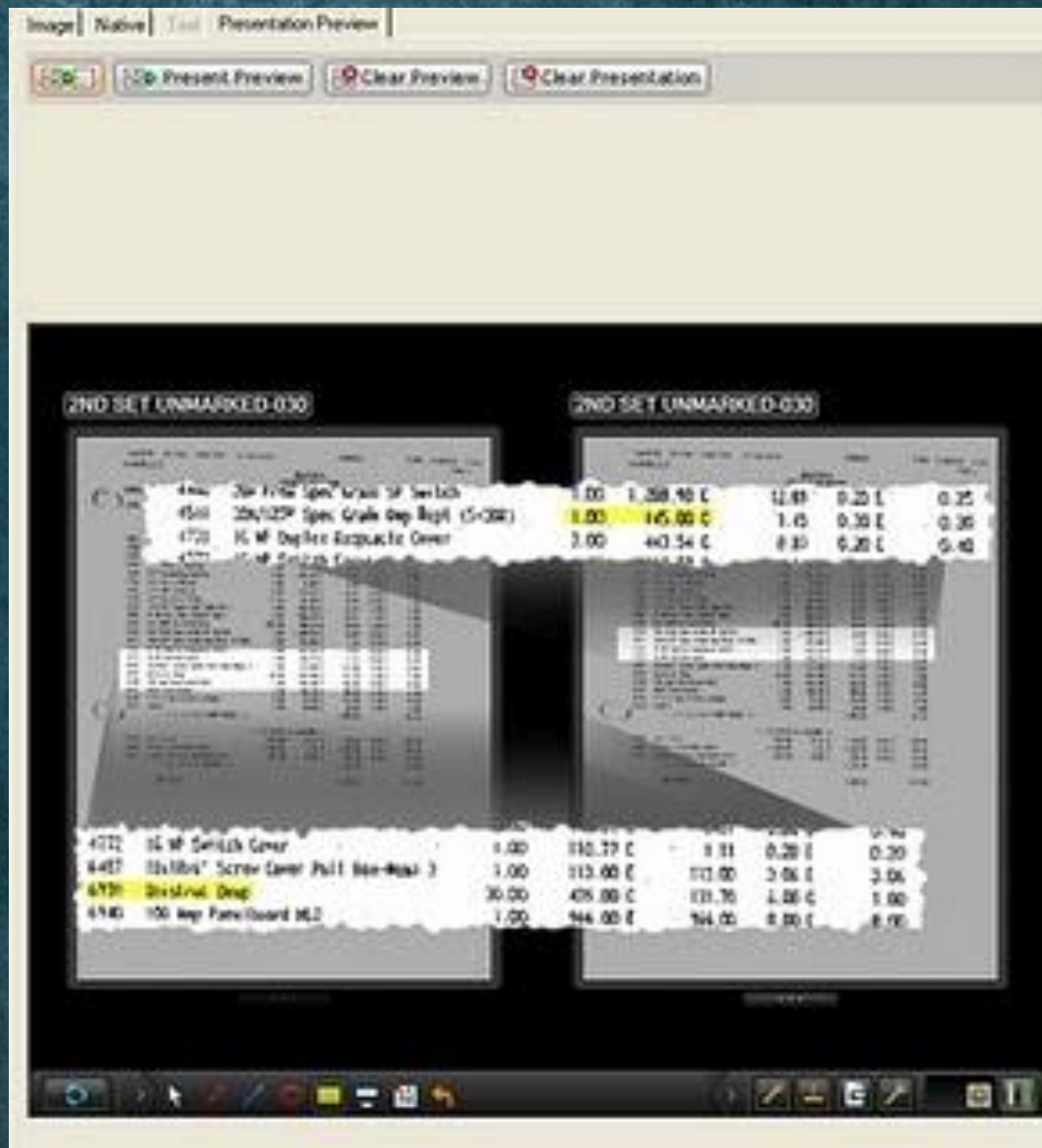
5: 04 videographer in association with Esquire

5: 05 Deposition Services. Our address is Suite

Figure 1. Truck route.

The screenshot displays a trial presentation software interface. The central video window shows a man in a suit sitting at a table, likely a deposition. To the left, a document viewer displays a page with a large red 'HIGHLY CONFIDENTIAL' stamp and a red 'EXHIBIT' stamp. The document text includes a list of questions (a) through (c) and a date of August 30, 2007. To the right, a map shows a truck route between Missouri and Arkansas, with an 'ACCIDENT LOCATION' marked. The bottom of the screen features a navigation bar with icons for 'Demo Presentation', 'Interrogatories', 'School Bus Damage', 'Accident Location', 'Notice', and 'Eric Mitford 10-31-2011'.

TRIAL PRESENTATION



VIDEO CLIPS

Transcript | Clip Editor | Search

Current Clip | **Clip Properties**

New... | Open... | Identifier: RB0908-008209 | Description: What did you respond? ... | Update


Clip Segment(s)

Segment	Start Time	End Time	Duration
Page 82:09 to 82:19	01:29:55.426	01:30:27.861	00:00:32.435

Add from: [] to [] | + Add | Adjust | Remove | Segment | Play Clip


Clip Review | Segment Editor

Adjust Segment Starting Time



01:29:55.426

Adjust Segment Ending Time



01:30:27.861

Adjust Segment Text

```
24 like that.
25 Q. Now, did he tell you that in pe
00082:01 telephone, by e-mail or other writings?
02 A. I believe he told me in person.
03 I believe.
04 Q. And was there anyone else prese
05 told you that?
06 A. I don't remember.
07 Q. Did you respond when he told yo
08 A. Yes.
09 Q. What did you respond?
10 A. I told him that I agreed.
11 Q. Did you tell him anything else?
12 A. I don't recall what I said to h
13 Q. Did you elaborate on your agree
14 why or what you'd seen?
15 A. I felt that the project was jus
16 managed by the State and by the construc
17 in the State's best interest, and we nee
18 thought they needed to reconsider how it
```

Adjust Segment from: [] to [] | Update

Clip Wizard...

Create a New Clip

Enter the segment(s) that comprise your new Clip into the editing controls below.

To continue, click Next.

To exit, click Cancel.

Enter new clip segment(s) by Page:Line reference:

[] [00000:00] to [00000:00] | Add

Up | Delete | Down

Cancel | < Back | Next > | Create

Transcript Manager | Coding

PRACTICE

prioritize | organize | mobilize

PRACTICE

PRACTICE



Trial Technology Best Practices

I like to have a very near duplicate in the war room

Trial Presentation Software



Mini War Room on Wheels



Presentation on External Drive



- Server (all pre-configured)
- Wireless Router (30-50 devices)
- Managed network switch
- Scalable and redundant storage (1 to 2 TB)
- LCD Projector

- Computers crash
- Backup in fire/water proof safe

EMERGING TECHNOLOGY



MOBILE WAR ROOM



MOBILE WAR ROOM

- Fully equipped Mobile Litigation Command Center
- Mobile War Room for Trial (right outside the courthouse)
- ESI processing with **Digital WarRoom**
- Supply Closet (paper, pens, clips, post-its, etc.)
- Canon Color imageRUNNER Copier/Printer/Scanner
- Backup Canon Copier/Printer/Scanner
- 3G/4G Secure Broadband (in-motion)
- Secure Wi-Fi Hotspot for 30 Wi-Fi enabled devices
- File share through SharePoint, Base Camp and/or FTP
- Video Editing on the Fly
- Ability to Carry all Trial Exhibits and Supplies
- Fully Self-Contained with Restroom
- Espresso/Coffee Station





MOBILE WAR ROOM



All the comforts of home...transformed into war room work spaces.



RULES

RULES

LOCATION, LOCATION, LOCATION

SETUP PLANNING

WAR ROOM LIST

WAR ROOM SUPPLY LIST

TECHNOLOGY DUPLICATION

Feel Knee Deep in **Alligators?**

If you plan, prioritize, organize and mobilize...you will come across as **graceful as the duck** swimming in the lake.

Nobody really knows how fast your feet are swimming under that water to get away from the alligators!





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