

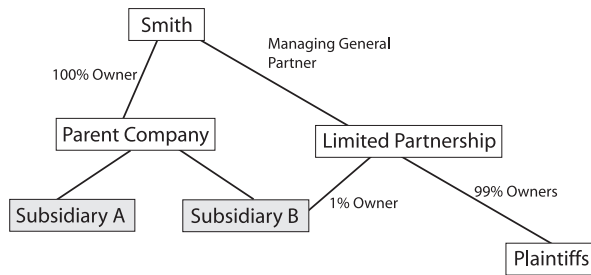
# FROM MY SIDE OF THE BENCH

## Make Your Briefs Graphic

BY HON. RANDY WILSON

**J**UDGES READ A LOT OF PAPER. We are constantly confronted with motions and briefs. Almost every brief a judge sees begins with the obligatory introduction and background that can often only be described as tedious. We are confronted with endless corporate family organizations and narrative chronologies. This factual background, while essential, is often written in the driest prose imaginable. Here is the lawyer's chance to win the judge over to his side of the facts, and the opportunity is usually squandered.

Make your briefs graphic. Insert charts into your briefs. Use chronologies. Use timelines. Almost every lawyer in America today writes his briefs with a computer. Your computer is more than a typewriter. Make your briefs come alive by using the simplest tools available on your computer. For example, if corporate structure is important background in your case, why would you only describe it in a narrative? Why not insert a simple organizational chart into the body of your brief? A businessman making a presentation to the board of directors would never dream of handing out a three page narrative description of corporate



organization if a simple chart could say it quickly and easily. Why is a judge a different audience? For example, you could quickly and accurately describe a corporate structure with this simple chart (this chart took me 20 minutes to create with a program available on any computer).

Similarly, if a time sequence of events is important, why describe it in words? Everyone knows the value of graphic demonstrations to the jury. A judge is no different. If it's important to your case that a certain event occurred before another event, show it. Put the chronology in your brief. Wrap the text around it. Your computer is a marvelous tool. Spend a few minutes and learn how to use it.

Use your imagination. If your case involves a boundary dispute, put a map in your brief. If you're claiming that a product was dangerous, insert a picture of the product in your brief. All you have to do is merely scan the picture or map and paste it into the brief.

If you want your briefs to be remembered, make them jump off the page. If you insert pictures and graphs in your brief, the judge will surely remember it at oral argument. The judge will also have confidence that you know what you're doing and that you have a command of your facts. Make your briefs come alive!

*Judge Randy Wilson is judge of the 157<sup>th</sup> District Court in Harris County, Texas. Judge Wilson tried cases at Susman Godfrey for 27 years and taught young lawyers at that firm before joining the bench. He now offers his suggestions of how lawyers can improve now that he has moved to a different perspective. ★*

