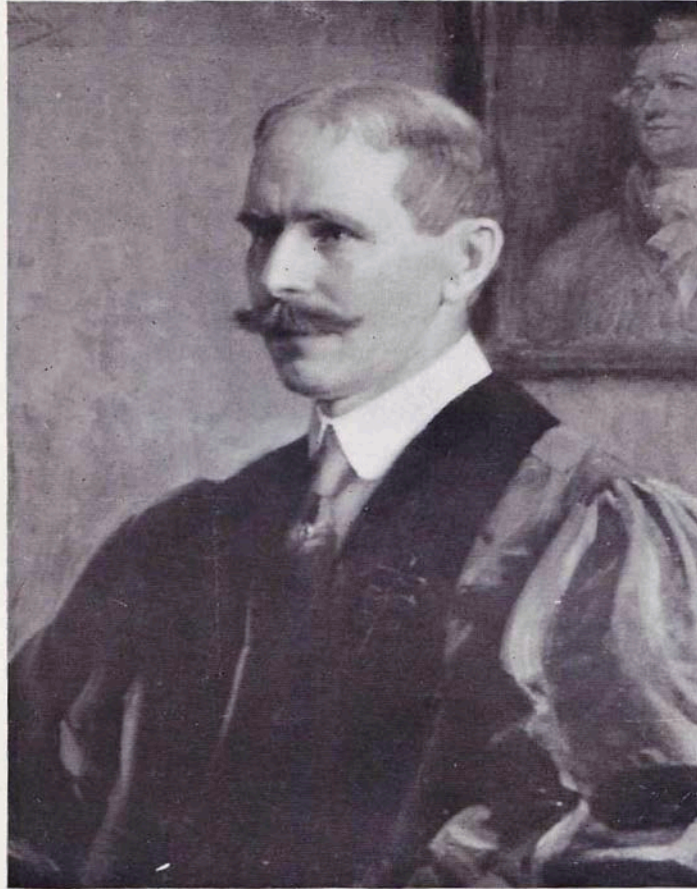


Art of Cross Examination

Presented by:

James T. Murphy, Esq.





JOHN H. WIGMORE

Dean of Northwestern University School of Law

From a painting by Arvid Nyholm

**CROSS-EXAMINATION IS THE GREATEST LEGAL ENGINE
INVENTED FOR THE DISCOVERY OF TRUTH**



1. PERSPECTIVE

2. PREPARATION

3. EXECUTION

1. IMPRESSION

2. PLANNING

3. TELLING

PERSPECTIVE & INTERPRETATION

Madame Augustine Roulin – Arles – Same Sitting



Van Gough



Gauguin











Be Prepared... the meaning of the motto is that a scout must prepare himself by previous thinking out and practicing how to act on any accident or emergency so that he is never taken by surprise.

(Robert Baden-Powell)

izquotes.com

“No Battle Plan Survives Contact With the Enemy”



German military strategist Helmuth von Moltke.

“Plans Are Useless, But Planning Is Indispensable”



General Dwight D. Eisenhower



Lincoln for the Defense, 1962

Cross Examination of Plaintiff, Susan Jones

C. Job Performance – Epinephrine Incident

December 28, 2008 Emergency response call re: young woman – difficulty breathing – administered epinephrine.

4 months into probationary period.

You, 2 volunteer EMT Privates (Dan Beard and Charlie Johnson) and a driver – Manny Medieros.

p. 16, l. 7-10 **You** were in command on the vehicle as the “paid person.” (N.B. This comports with Chairman Leary’s testimony that the **paid** employee person on the rescue would be the person **in charge**, assuming that person had the highest certification --e.g. as an EMT-C --and it was not necessarily related to rank such as captain or lieutenant.)

(Exhibit V) RI EMS Asthma Protocol (COPD) In responding to this call, governed by RI Protocol, especially re: administration of Epinephrine. Did not follow.

p. 85 (Exhibit T) Ambulance run report of December 28, 2008 relating to Annie Lennon).

Air Respiration Rate 30; No size or weight info ; 1 mg EPI; no ratio; no events at LMC described (e.g. Dr. Sharpe); “Report called to LMC with no further instructions.”

p. 88, l. 8 Jones acknowledges that it is her narrative.

p. 91, l. 6-9 She admits an **error** in the narrative itself with respect to the dosage. (In other words she didn’t give “1 milligram.” Rather, she says she gave .5 milligram and it “might have been an error on my part on my narrative.”

p. 94 **(Exhibit U)** Plaintiff’s incident report of December 31, 2008).

Respiration Rate 30-32; “heavy set;” .5 mg EPI; 1:10,000 – but pushed 1:1,000 (Not in Exh. “T”)



**KEEP
CALM
AND
LEAD
ON**









1. COMMIT

2. CREDIT

3. CONFRONT









TCM HD

**"YOUR HONOR,
MAY I HAVE PERMISSION TO
TREAT MS. VITO AS
A HOSTILE WITNESS?"**

