

### **IMPEACHMENT PROBLEM 3: MARIE WILLIAMS**

Assume that Ms. Williams testified at trial on direct examination that she went to the police “immediately” after this conversation with Mr. Jackson.

- (a) For Flinders, conduct a cross-examination and impeachment of Ms. Williams.
- (b) For Mismo, conduct a redirect examination to the extent necessary to rehabilitate.

CONFIRM the lie told at trial:

You just testified that after you accused Mr. Jackson of hiring Avery to burn down Flinders that you immediately went to the police.

Impeachment:

Isn't it true that you have previously testified under oath that you waited 10 days after being fired to go to the police?

If she answers “no”, CREDIT her deposition.

CONFRONT her with her prior inconsistent statement at p. 13, lines 4-11.