

IMPEACHMENT PROBLEM 9: SONIA PETERSON

Assume that Ms. Peterson has testified at trial on direct examination that both she and Mr. Jackson checked on Mr. Avery's credentials.

(a) For Mismo, conduct a cross-examination and impeachment of Ms. Peterson.

(b) For Flinders, conduct a redirect examination to the extent necessary to rehabilitate.

To set up impeachment:

You have testified that you checked Mr. Avery's credentials.

You also testified that Mr. Jackson checked Mr. Avery's credentials.

Impeachment:

Isn't it true that you did not check his credentials?

If she answers "no", before CREDITING her deposition, ask:

Isn't it also true that you do not know if Mr. Jackson checked Mr. Avery's credentials. You never talked to Mr. Jackson about his doing that?

If her answer is "no", CREDIT her deposition.

CONFRONT with her prior inconsistent statement at page 28, lines 1-15.