



# LAYING FOUNDATIONS AND MEETING OBJECTIONS: How to Succeed with Exhibits at Deposition and Trial

*Deanne Siemer*

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In *Laying Foundations and Meeting Objections*, Deanne Siemer gives you the questions to ask and the answers to get from your witness so that your exhibits will be admitted in evidence. Set up the foundation for an exhibit and protect against the objections available to your opponent. This text provides easy-to-follow examples for text documents, e-mails, spreadsheets, computer printouts, charts, graphs, maps, diagrams, drawings, computer animations, and more.

Never lose an exhibit to your opponent's objection. Make sure you do not miss any of the four elements of foundation: competence of the witness, identification of the exhibit, relevance, and authentication. Each of the elements has specific requirements right from the evidence rules. Keep yourself on firm ground so that each element is met. See how you can separate the objection to foundation from the other objections--hearsay, original document, and policy (undue prejudice, confusion, waste of time)--so that you can respond quickly and effectively when your opponent challenges your exhibit.

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