

## DO'S AND DON'T'S FOR YOUNG LAWYERS

- \* **Do** make it easy for the judge to rule in your client's favor with confidence. Consider providing case copies and well-written proposed orders.
  - \* **Do** be familiar with your client's case.
    - Don't** ask for a continuance due to your own failure to do something.
    - Don't** miss deadlines.
  - \* **Do** talk with opposing counsel prior to court to see if the issues can be resolved or narrowed.
    - Don't** call other people by their first names (at least in bankruptcy court!).
    - Do** address your remarks to the judge.
  - \* **Don't** attack the other lawyer in brief or in person.
    - Don't** feel obligated to respond to every little slight or comment.
    - Don't** wait to file pleadings until the afternoon before the hearing.
    - Do** be on time and in the courtroom for docket.
    - Don't** blame your staff for mistakes; the buck stops with you.
    - Don't** put more counts in the complaint than necessary.
    - Don't** file a motion to dismiss or motion for summary judgment to "educate the judge."
    - Do** think hard before you file a motion to dismiss based on a pleading deficiency that can be easily rectified; if you represent the plaintiff, amend the complaint to fix the problem.
    - Do** think strategically about whether to file a motion for summary judgment, even if you think one should be granted, in a nonjury case.
    - Do** have sufficient copies of your exhibits and an exhibit notebook if there are more than a few.
    - Do** move to admit your exhibits.
    - Don't** feel you have to rebut every single piece of negative evidence -- avoid going down non-relevant "rabbit trails."
- MOST IMPORTANTLY:
- \* **Don't** ever do anything to endanger your reputation, integrity, or credibility.