New York Matrimonial Trial Handbook

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By Joel R. Brandes

of the New York Bar

B.A. Queens College of the City University of New York; J.D. Brooklyn Law School; LLM, New York University, School of Law

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22-1. Direct Examination of Client This chapter contains questions which supplement the general questions to establish a prima facie economic case in chapter 12. These questions should be asked if necessary to suit your clients' request for exclusive occupancy. **Authors note:** Several of the questions in this chapter and the chapters that follow contain words or phrases in brackets or parenthesis. Several of the questions contain parenthesis or brackets separating the parts of the question or the person to whom a question may apply (i.e., [Plaintiff] [Defendant]). There are also questions written as singular and plural questions, (i.e., child (ren)) and (If yes) and (If no) questions which refer to whether the previous question was answered in the affirmative or negative. All or part of a question may or may not be applicable in your case. If so, counsel should use the portion(s) of the question that is (are) applicable in the particular case, rather than ask the question as written. In many instances, it may be necessary to repeat portions of a question or series of questions several times, each time using a different part of the question, or series of questions. If the client has personal knowledge of his or her spouses' circumstances the same questions which the client is asked about himself or herself may be asked with regard to the clients' spouse. Many of the same questions may be asked of the client's spouse on cross-examination, or on direct examination if you call the spouse as a witness on your direct case.

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