Lion-Training During Closing Argument

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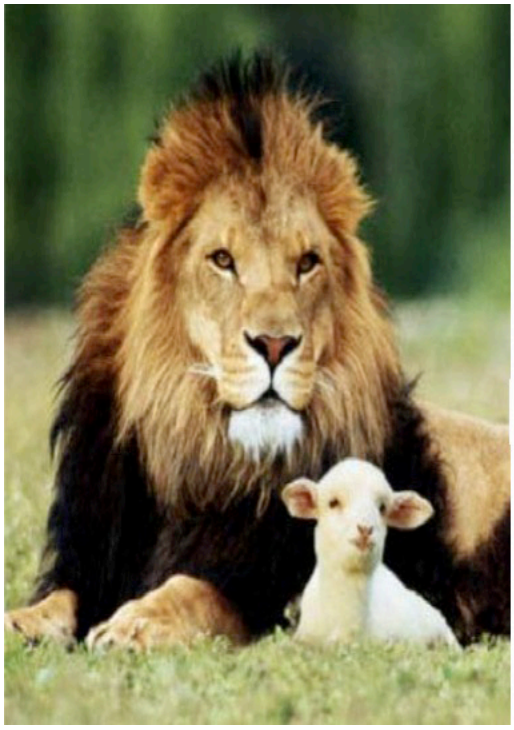
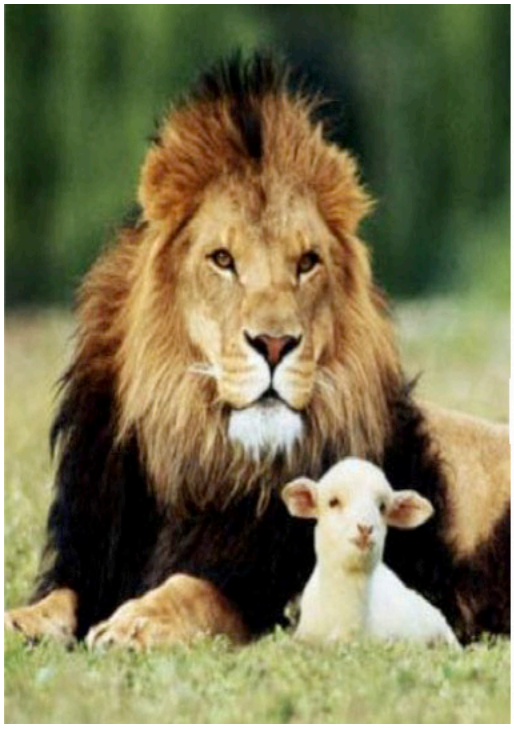



LION-TRAINING
danger




LION-TRAINING
danger
PREJUDICE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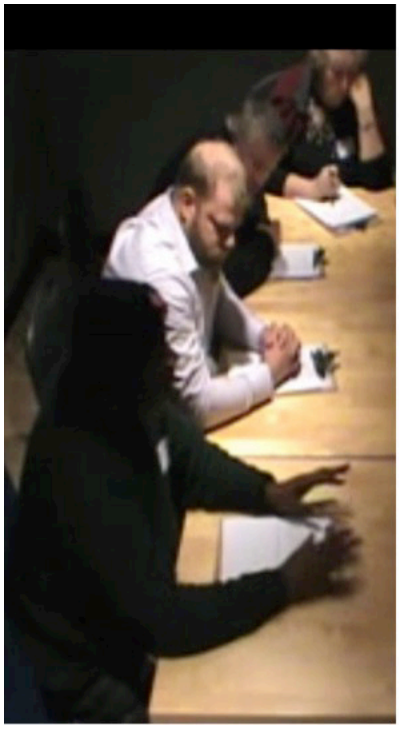
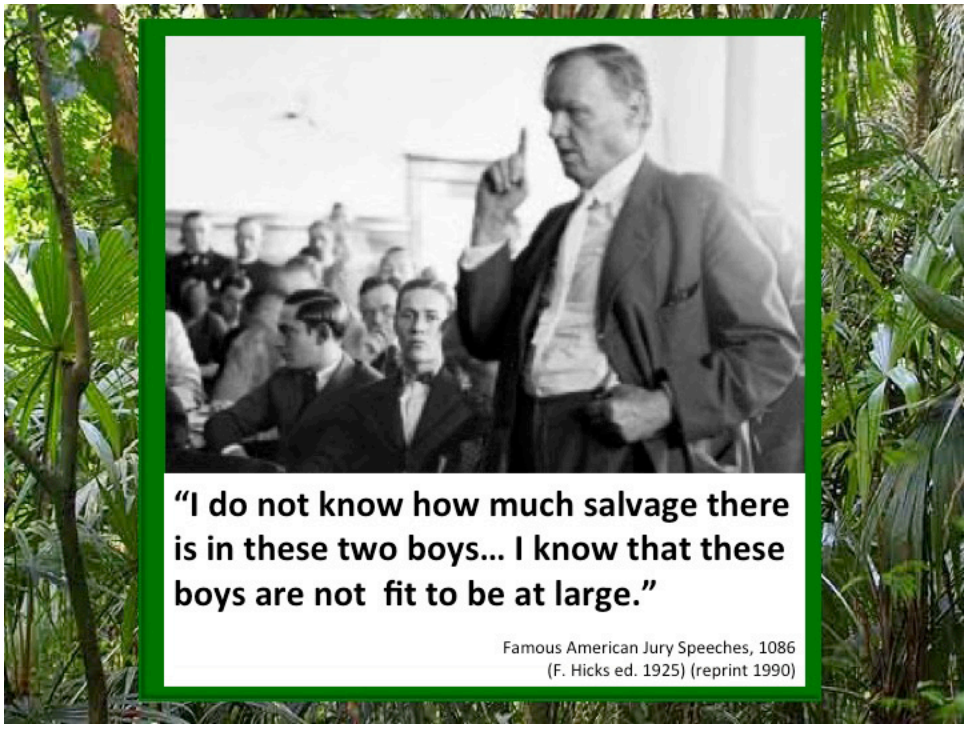
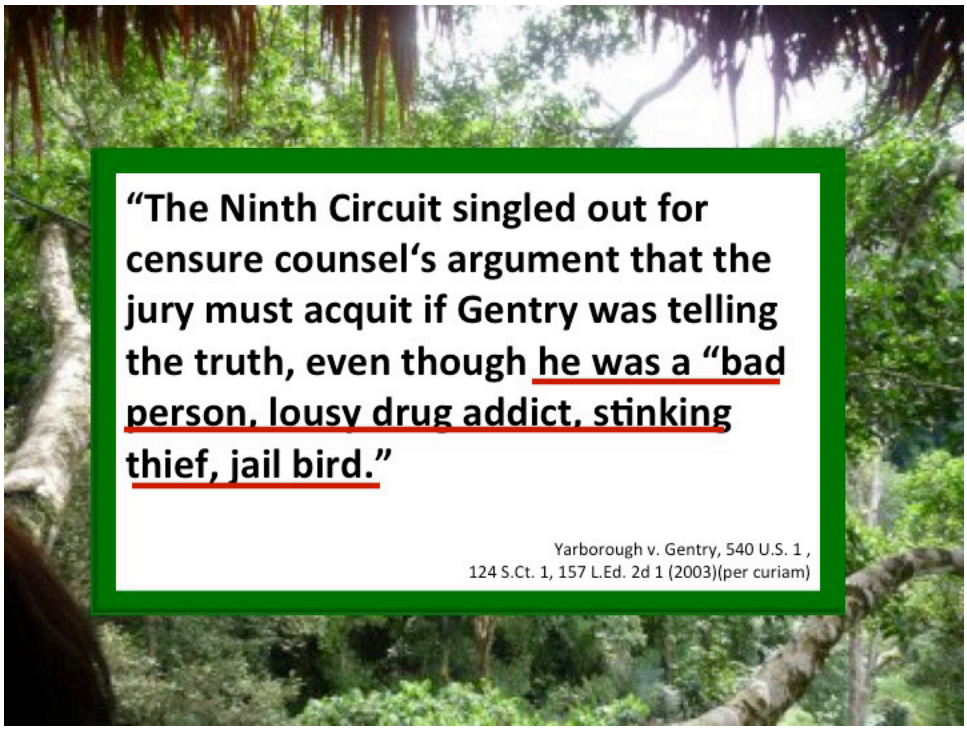
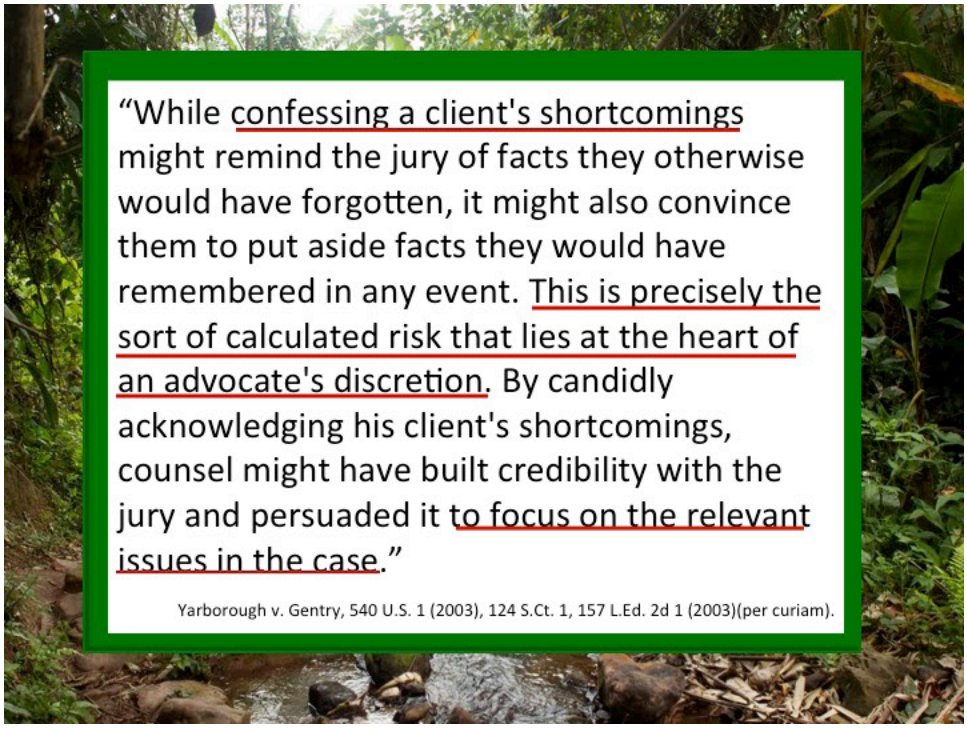


- "AIG owes everyone for that bailout"
- "I feel sorry for plaintiff's mom!"
- "that's why they have insurance."
- "terrified every time an 18 wheeler is behind me"


"I do not know how much salvage there is in these two boys... I know that these boys are not fit to be at large."
Famous American Jury Speeches, 1086
(F. Hicks ed. 1925) (reprint 1990)

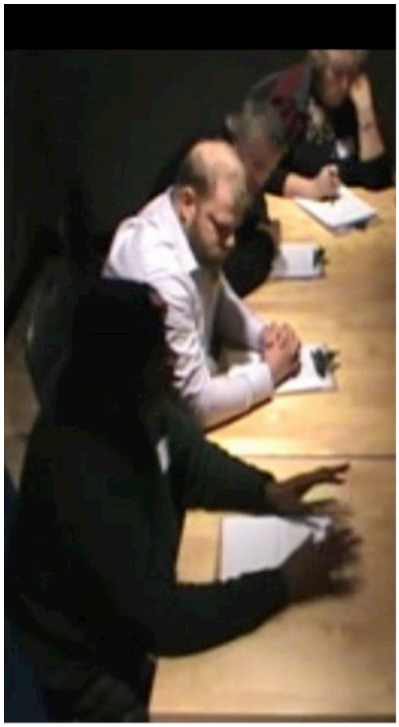

"The Ninth Circuit singled out for censure counsel's argument that the jury must acquit if Gentry was telling the truth, even though he was a "bad person, lousy drug addict, stinking thief, jail bird."
Yarborough v. Gentry, 540 U.S. 1 ,
124 S.Ct. 1, 157 L.Ed. 2d 1 (2003)(per curiam)



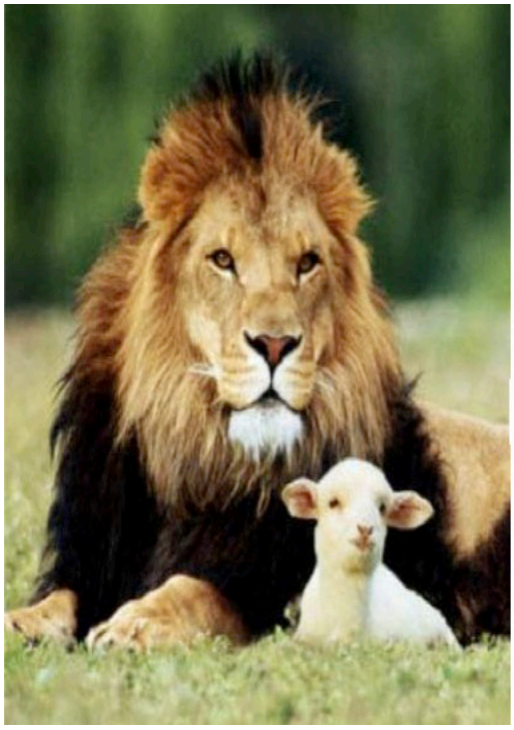
JURY CHARGE **3.1**

You are required by law to decide the case in a fair, impartial, and unbiased manner, based entirely on the law and on the evidence presented to you in the courtroom. You may not be influenced by passion, prejudice, or sympathy you might have for the plaintiff or the defendant in arriving at your verdict.[1]

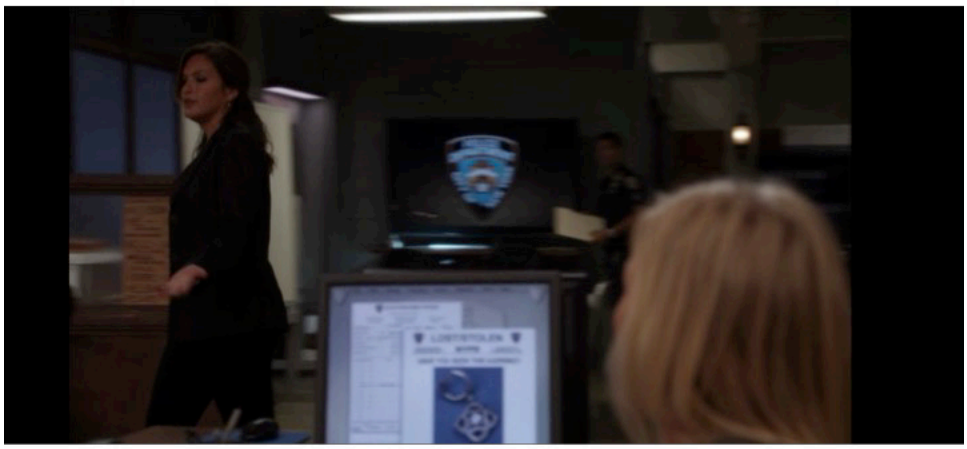
[1] *See* Instruction No. 2.16 for corporations and other entities.



- "AIG owes everyone for that bailout"
- "I feel sorry for plaintiff's mom!"
- "that's why they have insurance."
- "terrified every time an 18 wheeler is behind me"



"We handed the jury a mess, and they split the baby."



Detective Olivia Benson,
Law & Order: Special Victims Unit
"Scorched Earth" (2011)

Reject Compromise!

"The king then answered, 'Give the first one the living child! By no means kill it, for she is the mother.'"

1 Kings 3:27

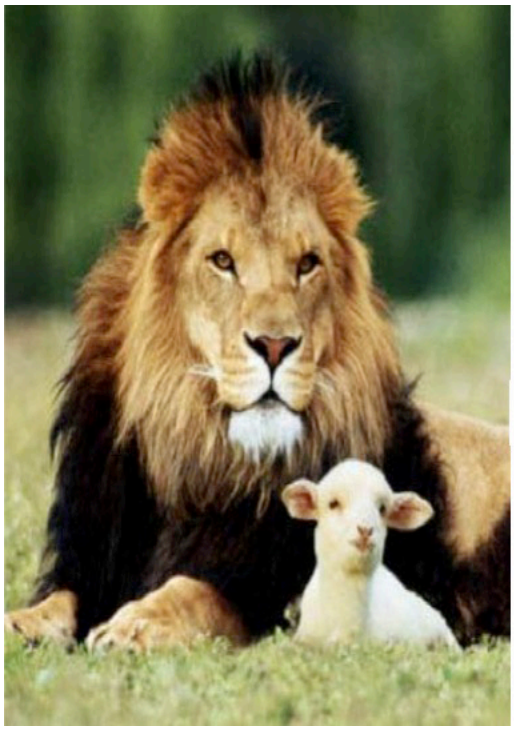
Embrace Compromise!

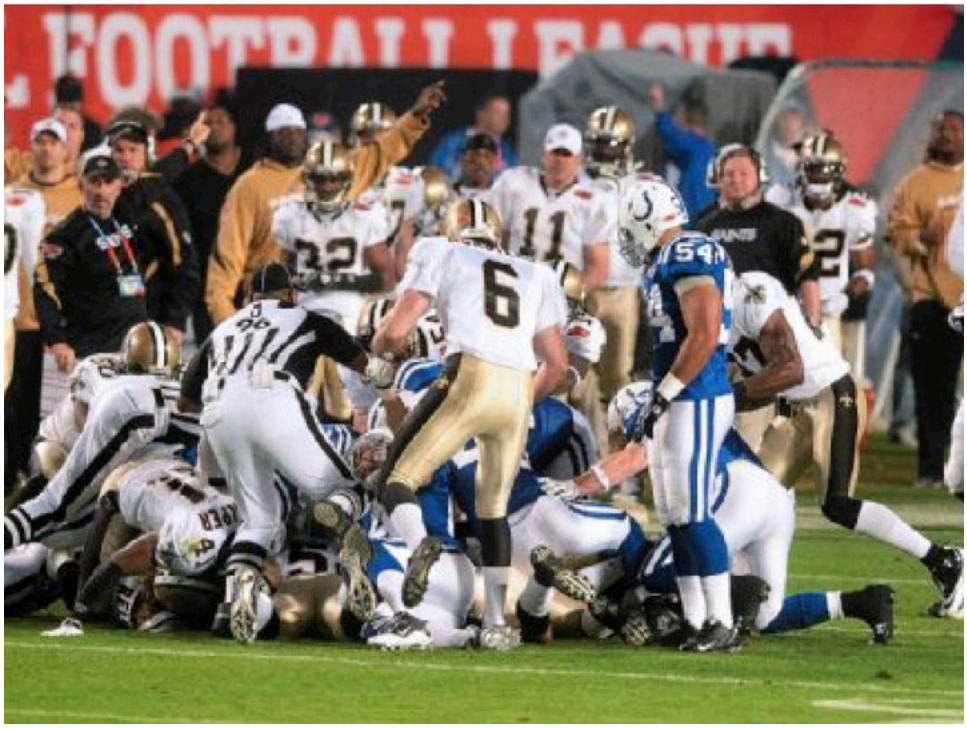
- Suggest both parties have taken extreme positions
- Identify a specific compromise
- Encourage jurors to reach an "equitable solution"
- Call jury's attention to any jury instruction that encourages working together & flexibility.

JURY CHARGE 3.7

3.7 Duty to Deliberate; Notes

It is now your duty to deliberate and to consult with one another in an effort to reach a verdict. Each of you must decide the case for yourself, but only after an impartial consideration of the evidence with your fellow jurors. During your deliberations, do not hesitate to re-examine your own opinions and change your mind if you are convinced that you were wrong. But do not give up on your honest beliefs because the other jurors think differently, or just to finish the case.



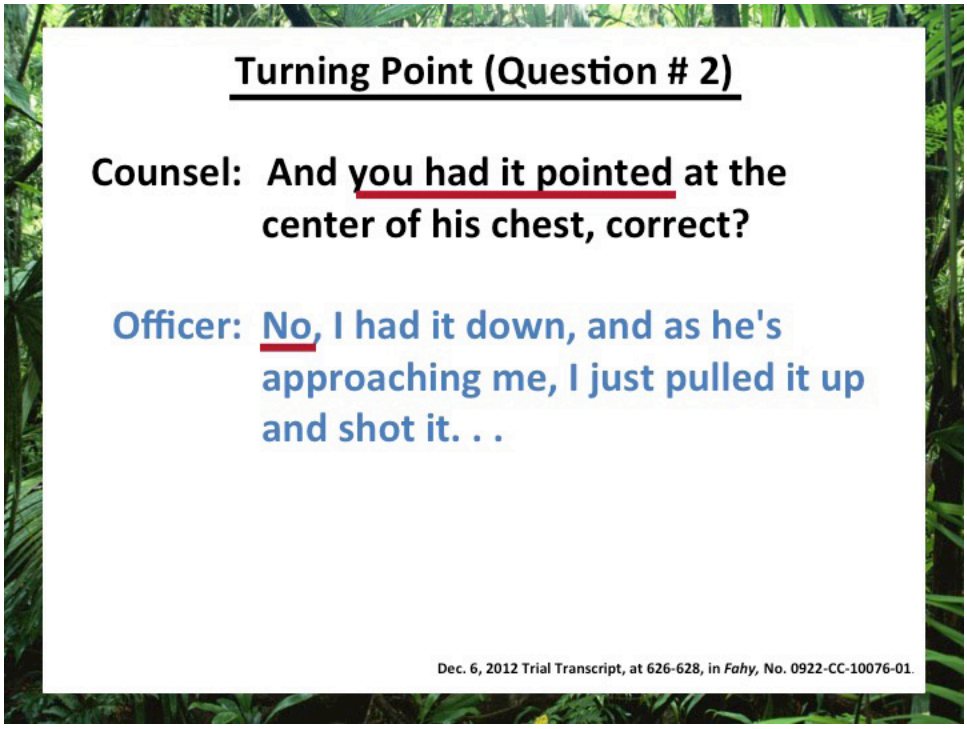


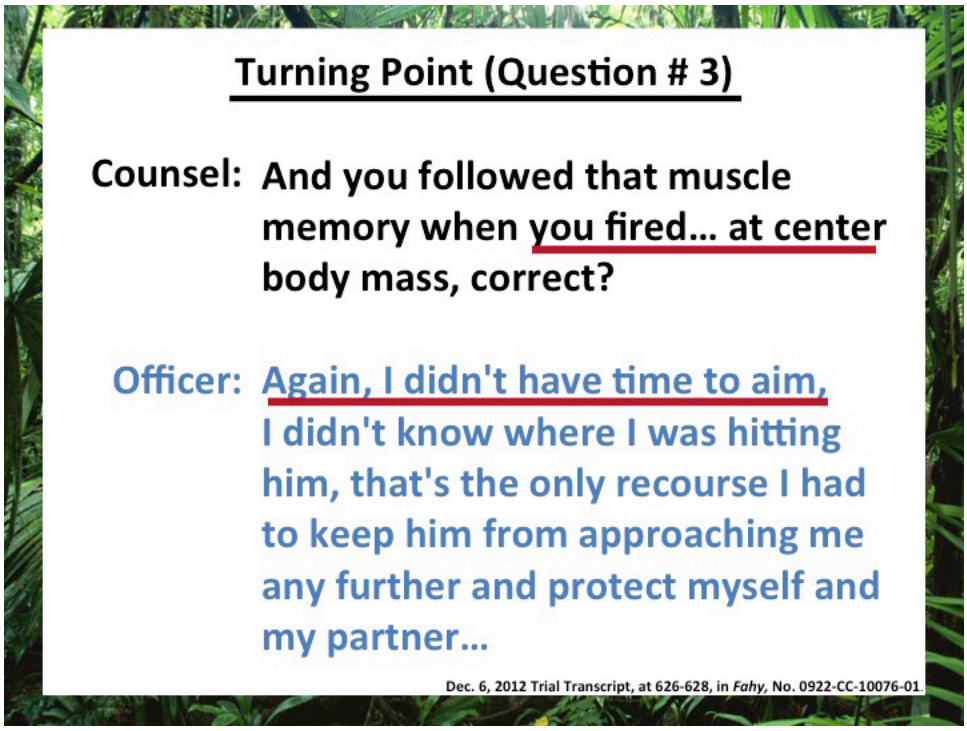
Turning Point (Question # 1)

Counsel: And so you fired… just like you had been trained to at center body mass, correct?

Officer: I didn't know where it was going to hit him, I just shot it. That's all I could do. I couldn't aim. I was surprised it shot him in the chest because his fists were up like this…

Dec. 6, 2012 Trial Transcript, at 626-628, in *Fahy*, No. 0922-CC-10076-01.


Turning Point (Question # 2)
Counsel: And you had it pointed at the center of his chest, correct?
Officer: No, I had it down, and as he's approaching me, I just pulled it up and shot it. . .
Dec. 6, 2012 Trial Transcript, at 626-628, in Fahy, No. 0922-CC-10076-01.


Turning Point (Question # 3)
Counsel: And you followed that muscle memory when you fired... at center body mass, correct?
Officer: Again, I didn't have time to aim, I didn't know where I was hitting him, that's the only recourse I had to keep him from approaching me any further and protect myself and my partner...
Dec. 6, 2012 Trial Transcript, at 626-628, in Fahy, No. 0922-CC-10076-01.

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Taser Beats Heart Attack Victim's Failure To Warn Suit

By Juan Carlos Rodriguez

Law360, New York (December 14, 2012, 2:54 PM ET) -- A St. Louis jury on Thursday cleared Taser International Inc. of any responsibility for its products or their use in a suit brought by a man who allegedly suffered brain damage after receiving a shock from a police officer.

The state court jury, in a 9-3 vote, rejected plaintiff Colin Fahy's claims that Taser's X26 model delivers a more powerful shock than is advertised and that the company failed to properly warn police officers not to shoot people in the chest and not to subject those being shocked to prolonged exposure.

John Burton, an attorney for Fahy, said the verdict was disappointing.

"T... ca... ma... en...

He said other jurors felt that the dynamics of the situation did not give the officer time to aim differently and so a warning wouldn't have made any difference.

"We are gratified that our efforts in bringing this and similar cases has caused Taser to change its warning. And since September 2009, they have been telling police

He said other jurors felt that the dynamics of the situation did not give the officer time to aim differently and so a warning wouldn't have made any difference.

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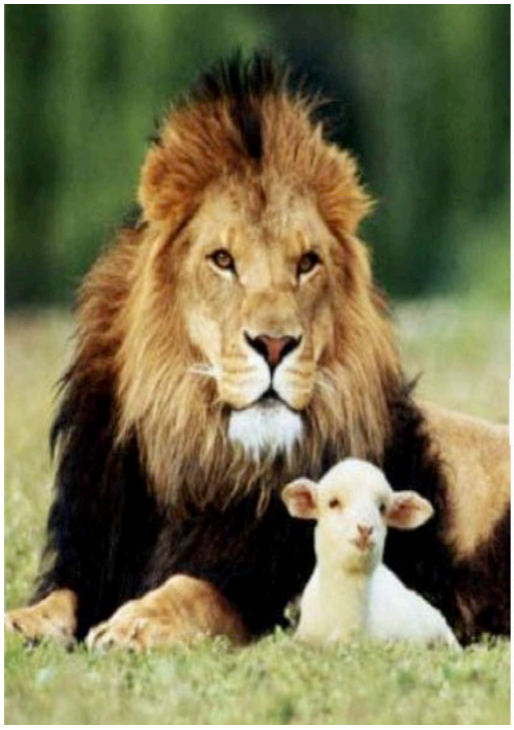

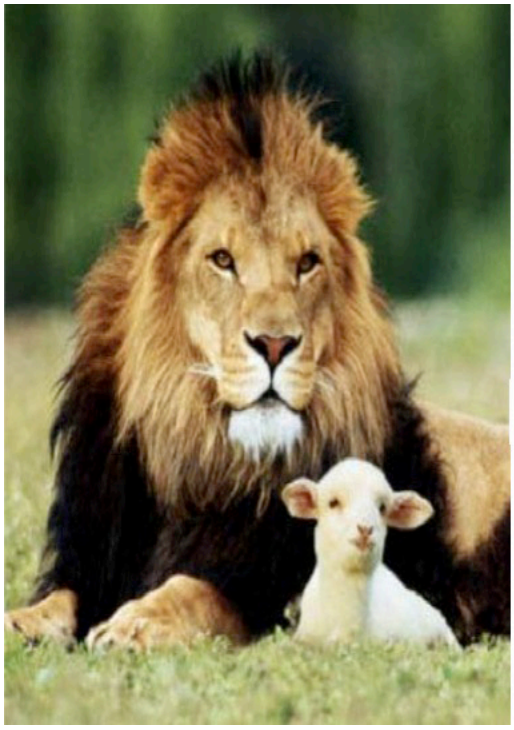


LION-TRAINING
danger
PREJUDICE
COMPROMISE
TURNING POINT
EXHIBITS
ALAMO

Five Questions To Ask Your Lion-Tamer Before Closing Argument

Every jury can be divided into Lions and Lambs, and the Lions eat the Lambs. The same adversarial system that forbids the use of a prejudicial pronoun during closing argument is more than willing to lock complete strangers in a windowless room, without bailiff or judge, until they reach a verdict. It is a gilded cage and a juridical Thunder Dome:

"Twelve opinions enter, one verdict leaves!"

Jury deliberation has become survival of the fittest, and the fittest jurors, not the fittest opinions, survive. Jurors rarely elect a foreperson and immediately reach a verdict. It is far more likely your jury will spend hours "deliberating," and the verdict will be determined by one persuasive juror. The longer the deliberation, the more likely a Lion will devour a Lamb.

You may not spot the Lions during voir dire. Sequestration gives jurors the opportunity to become what they are, and Lions often rear their heads for the first time during deliberation. Yes, Lions can be teachers, preachers, and lawyers (the "Big Three"), but education and employment are not the only factors. Jurors become Lions for different reasons. Sometimes jurors become Lions because of their age, intelligence, diplomacy, sensitivity, gravitas, prior jury service, personal experiences, or the friendships they've developed with other jurors. You don't need to know who the Lions are, but you need to remember they are out there, waiting in the tall grass.

Change the way you think about closing argument. Too many closing arguments are wasted trying to persuade Lambs instead of teaching the Lions how to be persuasive.[1]

Friendly Lions do not hunger for metaphors and similes. They hunger for your advice. Warn your Lions about the cage. Prepare them for prejudicial comments, emotional appeals, and unreasonable demands to compromise. Make certain they understand and can tell your story. Feed them only the exhibits, facts, and arguments that will actually sustain them during deliberation. Stop searching for the perfect combination of words to rebut an argument, and start searching for the most memorable combination of words. Stop trying to cover every point, and figure out what the Lions need to remember. Nobody cares if you win the trial on your legal pad.

At the end of a long jury trial, one attorney is often left alone to write a closing argument that is consistent with the theme established in opening statement and the evidence presented during the trial. Understandably, other members

1 You can read more about closing argument strategy in Mr. Glas' chapter entitled "Feeding Lions During Closing Argument," which appears in the American Bar Association's 2015 book entitled "From The Trenches: Strategies and Tips From 21 Of The Nation's Top Trial Lawyers."

of the litigation team are often reluctant (read: scared to death) to ask questions or make suggestions during this stage of the process.

But there are five basic questions every client should be asking, and every trial lawyer should be able to answer, before closing argument.

1. How are we going to address prejudice?
Attorneys routinely file motions asking the court to prohibit opposing counsel from making a prejudicial argument or observation during closing argument. When those motions are granted, lawyers should consider the possibility that a juror will independently make the same prejudicial argument or observation during jury deliberation.

- How could that juror's comment affect other jurors?
- How would you want a Lion to respond that comment?
- If you say nothing during closing argument, will a Lion recognize – on his or her own - that the comment is not relevant to their deliberation?
- Will a Lion – on his or her own - be able to persuade the Lambs to ignore the prejudicial comment, fact, or opinion?

Sometimes, the best strategy is to "put the skunk on the table"[2] by openly discussing sympathy, bias, and prejudice during closing argument. That decision will always depend on the circumstances of the specific trial, but your litigation team should always discuss whether and how to "put the skunk on the table."

Carefully consider feeding Lions your response to sympathy. Most civil jurors are not millionaires. Many live paycheck to paycheck. Many are unemployed. Many receive some form of government assistance. Some are powerless to change their own lives, and they have just been given the power to change the life of an injured or cheated plaintiff.

In a civil trial, a defense attorney should consider acknowledging that the desire to help another person is natural, strong, and good. Acknowledge that you picked good people to serve on the jury, and that you fully expect good people to feel sympathy for the plaintiff, but proceed to explain that justice requires a fair and objective weighing of the evidence.

Remind jurors their verdict should be based solely on the physical and testimonial evidence. If there is a specific jury instruction to that effect, show it to them and read it to them. Then warn the Lions what they might hear during deliberation:

- If a juror says, "We have to help that family," that juror has stopped weighing the evidence.
- If a juror asks, "If the defendant doesn't pay, what are they going to do?," that juror has stopped weighing the evidence.
- If a juror thinks, "They won't get any money if we blame the empty chair," that juror has stopped weighing the evidence.

Carefully consider feeding Lions your response to any overt attempts to bias or prejudice jurors against your client. During a 2005 jury trial (the Pyles trial),[3] we defended a French Quarter gentlemen's club against a former entertainer's claim of negligent security. While on the stand, plaintiff volunteered that the club always closed for the Bayou Classic, an annual football game held at the Superdome in New Orleans that brings in fans and alumni of Southern University and Grambling State University, two historically African-American universities. The suggestion was that the club closed because it did not want to serve African-Americans.

During closing argument in the Pyles trial, my co-counsel directly addressed the club's closure by telling the jury (paraphrasing): "When the facts are on your side, argue the facts. When the law is on your side, argue the law. And when the law and the facts are not on your side, tell the African-American jurors that the club closed for the Bayou Classic." The effectiveness of that message prompted opposing counsel to spend his most of his rebuttal insisting the club's closure was not raised to bias or prejudice the jury. Plaintiff asked the jury to award more than $1 million against the club, and the jury awarded $90,000.

Trial attorneys will often retain jury consultants to organize and conduct mock trials or focus groups in the same venue. These jury consultants will actively recruit and screen volunteers to make certain they assemble a demographically similar mock jury. During these research sessions, pay attention to more than just the verdict. Pay attention to every comment that distracts or prejudices a juror against your client. Label a page "Ideas for Voir Dire & Closing Argument," and write down comments like the following in a civil case:

- "That's the price of doing business."

2 Proper credit should be given to my mentor, Robert E. Kerrigan, Jr., who was the first and only attorney I have ever heard use the expression "put the skunk on the table."

3 Pyles v. Weaver, No. 2001-15258 (Orleans Parish, La., Civil Dist. Ct. 2005).

- "That's why they have insurance."
- "Why wouldn't they warn about everything?"
- "If it happened on their property, I don't care if it's their fault."
- "This is a drop in the bucket for them."

After the jury research session, discuss the risks and reward of warning Lions about the most likely prejudicial comments, and teaching them how to respond.

2. Should we address compromise?
At some point during deliberation, a friendly Lion may be surrounded by Lambs who want to agree on a "compromise" verdict. Picture a juror suggesting they "split the baby" by awarding the midpoint between requested awards in a civil trial, or by convicting the defendant of a lesser and included offense in a criminal trial. How do you want the Lions to respond to that suggestion?

Lions often despise splitting the baby because they truly believe their position. If they are not careful, Lions can permanently scare off Lambs by emotionally or quickly rejecting the concept of compromise. Prepare the Lions for the suggestion of compromise by feeding them your response to compromise.

If the trial has gone poorly for your client, and the decision is made (preferably in writing) to suggest a compromise verdict during closing argument, discuss these approaches:

(1) Suggesting both parties have taken extreme positions and identifying the midpoint;

(2) Calling the jury's attention or casually referencing any jury instruction that encourages compromise or working together;

(3) Encouraging jurors to reach an "equitable" solution; or

(4) Reminding jurors that good settlements are often defined as settlements that leave both parties unhappy.

Remember that by encouraging the jury to award the midpoint ($50,000) between the plaintiff's requested verdict ($100,000) and the defendant's ($0), you run the risk that the jury will consider your midpoint ($50,000) an admission that you are liable for the midpoint ($50,000), and will focus on whether to split the baby by awarding the midpoint ($75,000) between your admission ($50,000) and the plaintiff's demand ($100,000). Good plaintiff attorneys will encourage that kind of deliberation by writing their demand and your "midpoint" on the board and by telling Lions, "Okay, they're at $50,000 and we're at $100,000."

If you don't want the jury to return a compromise verdict, then you need to feed the Lions a more diplomatic response than "No!"

During a 2009 jury trial (the Craige trial),[4] we admitted that our client was 100 percent responsible for causing the car accident, but we denied the allegation that the accident caused plaintiff's subsequent paralysis because our experts concluded her paralysis was caused by an unrelated inflammation of the spinal cord called transverse myelitis. Based on the testimony, it was an all-or-nothing case, and our client was concerned the jury would decide to split the baby and return a verdict of more than a million dollars. With the client's permission, I told the Lions a story that would increase the likelihood of a zero verdict.

During closing argument in the Craige trial, I told jurors that "Solomon-like" wisdom was a misnomer because King Solomon did not actually split the baby.[5] Solomon is considered wise because he refused to split the baby. He only threatened to split the baby to learn which woman would object to his harming the child. People forget that Solomon actually gave the whole baby to the woman who was entitled to the whole baby, and gave nothing—not even a hair of the baby—to the woman who was not entitled.

The Lions were listening. During the Craige trial, the jury never got past the first question on the jury interrogatory because the Lions refused to split the baby. After hours of deliberating, the jury vote was reportedly 8 (yes) to 4 (no) on whether the accident caused any injury, and the jury notified the court they were deadlocked. The judge responded by giving a "dynamite" or Allen[6] charge, telling jurors the parties were entitled to a verdict and encouraging them to work together toward a verdict. After further deliberation, the vote swung toward the defense, reportedly becoming 7 (yes) to 5 (no). The judge found the jury was hopelessly deadlocked and declared a mistrial.

3. What will we say was the "turning point" in the trial?
Perception is reality. In hindsight, people perceive most long-term endeavors as having a turning point. Every war has a turning point. Every career has a turning point. Every successful and unsuccessful relationship has a turning point. And every courtroom movie or television drama has a

4 Craige, No. 06-12739.

5 King Solomon's "splitting the baby" story may be found in The New American Bible, 1 Kings 3:16-28.

6 Allen v. United States, 164 U.S. 492 (1896) (approving the use of a jury instruction intended to prevent a hung jury by encouraging jurors in the minority to reconsider).

turning point. Consequently, Lions may search for a turning point in your trial, and Lambs may be persuaded by a Lion's ability to identify one.

Feed Lions your turning point in the trial. Tell them that a specific witness, exhibit, or ruling by the court was the turning point, and explain why that turning point requires a verdict for your client.

Identifying a moment as a "turning point" can become a self-fulfilling prophecy. History proves that the turning point in a war is often remembered long after the countless skirmishes are forgotten. Similarly, the longer jury deliberates, the more likely the jurors will remember and discuss the "turning point" you identified during closing argument.

A single answer or a single line of questioning can be the turning point in the trial. During a 2012 product liability case (Fahy v. Taser International),[7] plaintiffs asked the jury to award $12 million in compensatory damages plus punitive damages. Plaintiffs claimed our client, the leading manufacturer of conducted electrical weapons (CEWs), was liable for failing to warn officers to "avoid the chest when possible."

During closing argument, I told jurors the turning point in the trial was when the police officer testified she had "no time to aim" because the fists-up plaintiff was only six feet away and coming right at her. I argued that if the officer had no time to aim, then an additional warning to avoid "aiming" at the chest would not have changed the outcome.

Turning points can evoke a visceral reaction by opposing counsel. During the Fahy trial, I reminded jurors that when the officer testified that she had "no time to aim," opposing counsel responded by repeatedly and unsuccessfully trying to get the officer to say she "fired at" center mass" or "pointed" at the center of plaintiff's chest. As the trial transcript reflects:

> Q: And so you fired . . . just like you had been trained to at center body mass, correct?
>
> A: I didn't know where it was going to hit him, I just shot it. That's all I could do. I couldn't aim. I was surprised it shot him in the chest because his fists were up like this.
>
> . . .
>
> Q: And you had it pointed at the center of his chest, correct?
>
> A: No, I had it down, and as he's approaching me, I just pulled it up and shot it.
>
> . . .
>
> Q: And you followed that muscle memory when you fired . . . at center body mass, correct?
>
> A: Again, I didn't have time to aim, I didn't know where I was hitting him, that's the only recourse I had to keep him from approaching me any further and protect myself and my partner. . . .[8]

Of course, there is no way of knowing to what extent the officer's testimony or opposing counsel's tactical response affected the vote of any juror, but the jury did not find the manufacturer liable.

Turning points are not limited to physical and testimonial evidence regarding liability. During a 2004 jury trial (the Molo trial),[9] we defended an excess insurer against the claim that a falling blowtorch caused permanent and severe brain damage, requiring constant supervision and care. During direct examination, plaintiff's wife testified that she was afraid to leave him alone; but, on cross-examination, she admitted to leaving their six-month-old grandchild alone with plaintiff while she worked. That admission was the turning point in the trial. That one act of trust spoke louder than anything the experts said about cognitive or behavioral impairment. The jury's verdict did not exceed the primary policy, and no judgment was entered against our client.

4. What exhibits should we tell them to call for?
Every jury deliberation starts with Lions and Lambs walking into a room with an empty table. If you could walk into that room with them, and spread out all the exhibits you wanted Lions to feast on during deliberation, what exhibits would you pick? Start preparing your closing argument by picking the exhibits you are going to tell them to call for during deliberation. If deliberation last more than a day, your Lion may need to call for your closing argument exhibits.

Telling Lions to call for a specific exhibit emphasizes the importance of that exhibit, shows confidence in your case, and can directly affect jury deliberation. During a 1998 first-degree robbery trial (the Allen trial),[10] the prosecution had to prove it was reasonable for a cashier to think the accused was armed when he ran into a video store, said he had a gun, demanded money, and started pushing his fist into the cashier's back.

During closing argument, I encouraged (practically begged) jurors to call for the ring the accused was wearing, and to take turns pushing it into each other's back. I reminded jurors

7 Fahy v. Taser Int'l, Inc., No. 0922-CC-10076-01 (St. Louis, Mo. Cir. Ct. 2012).

8 Trial Transcript at 626–28, exh. 1 to Defendant's Response in Opposition to Plaintiff's Motion for a New Trial, Fahy, No. 0922-CC-10076-01 (Dec. 6, 2012).

9 Molo v. S. Magic, Inc., No. 103,600 (La. 16th Judicial Dist. Ct. 2004).

10 State v. Allen, No. 394-080 (Orleans Parish, La., Criminal Dist. Ct. 1998).

that it was a cold night, and the flat circular ring would have felt like the cold steel of a gun. The jury reportedly called for the ring, and found the defendant guilty as charged.

Do not force Lions to comb through stacks or binders of paper trying to find the specific note you read during closing argument. Make certain you prepare a list of your closing argument exhibits and (if possible) keep those exhibits separate. Consider placing them in a folder marked "closing argument exhibits" before returning them to the clerk, because the court may send all the exhibits to the jury if you can't quickly identify the requested ones.

You cannot highlight exhibits after they have been admitted into evidence. During the pre-trial conference, ask the court if it allows the parties to admit highlighted exhibits into evidence. If the court does, highlight what you want the Lions to read when they call for an exhibit. If there are only a handful of exhibits involved in your trial, consider color-coding your highlights based on the specific legal or factual issue they address. Picture yourself encouraging Lions to call for your closing argument exhibits, and telling them that all evidence of a cervical herniation is highlighted green.

Make certain Lions can see any note or number you read during closing argument. Whether the courtroom has a single projector screen or monitors for every juror, make certain jurors can read the note and see where that note is located on the document because Lions may have to find the note later without you. If the courtroom has no screens or monitors, enlarge and mount your documents.

Avoid putting all your eggs in one slide-show presentation. During a 2009 civil jury trial (the Craige trial),[11] my clicker became stuck, and my opening statement slide show started racing through more than 30 slides. I was forced to finish my discussion of the witnesses and evidence from memory. Consider enlarging and mounting a handful of your closing argument exhibits as a back-up plan should your computer or your clicker betray you.

5. What is our Alamo?

Lions and Lambs will remember the last thing you say during your closing argument. No attorney should try to memorize an entire closing argument, but every attorney should nail the last 15 to 60 seconds, which I call my Alamo.[12]

The Alamo is where you make your last stand. If you get lost or nervous, remember the Alamo! If your closing argument starts to lag, remember the Alamo! When you realize you have only one minute left, remember the Alamo!

There are no hard-and-fast rules for building your Alamo. Repeating your theme during your Alamo is usually a good idea because your theme is usually based on your most important fact, exhibit, or argument. Ending your closing argument with the same theme you used for your opening statement also bookends the trial, creates symmetry, and emphasizes that the trial went according to plan.

An effective Alamo can be the presentation of a single exhibit. During a 1997 second-degree murder trial (the Collor trial),[13] the detective testified that after receiving an anonymous tip, he confronted the defendant, who gave a taped statement claiming he shot the victim out of fear for his life. During the trial, the defendant took the stand and retracted his statement to the detective. He testified that he saw another man shoot the victim over a drug deal, and insisted the detective forced him to make a false statement. My co-counsel ended the State's rebuttal by placing a tape player directly in front of the jury, inserting the audio tape (rewound to the admission), and pressing play. The last thing the jury heard was the tape of the defendant admitting that he shot the victim. It was a very effective Alamo, and the jury found the defendant guilty as charged.

Plaintiffs and prosecutors should save their Alamo for rebuttal. During a 1997 cocaine distribution jury trial, defense counsel called witnesses to establish that the defendant had a job and was an enterprising young man. There was no guarantee the veteran public defender was going to give a closing argument, and I felt we needed to answer the question, "Why would this defendant sell drugs?"

During my closing argument, I told the urban legend about the reporter who asked Willie Sutton, a prolific American bank robber, "Why do you rob banks?" and Sutton replied, "Because that's where the money is." I produced the cash found on the defendant, and asked the jury, "Why would an enterprising young man sell drugs?" Then, one by one, I started stacking the bills in front of the jury until a juror in the front row actually muttered, "Because that's where the money is." That dream trial moment soon became a nightmare as the veteran public defender pointed out that I was wrong about the bank robber (I said Jesse James instead of Willie Sutton) and wrong about his client. He aptly focused the jury's attention on my decision to focus on motive in a drug distribution case instead of on evidence of a sale.

It can be risky for plaintiffs and prosecutors to save their Alamo for their rebuttal because opposing counsel is not required to give a closing argument. During the Whitton trial,[14] we convicted the defendant of four counts of first-degree murder and proceeded to the penalty phase of the trial, during which evidence of mitigating and aggravating

11 Craige v. Grundmann, No. 06-12739 (Orleans Parish, La., Civil Dist. Ct. 2009).

12 Proper credit should be given to Greg L. Johnson, Brett D. Wise, and all of the other attorney-coaches who developed and polished the concept of an effective "Alamo" during the many years we coached the Jesuit High School mock trial team.

13 State v. Collor, No. 384-951 (Orleans Parish, La., Criminal Dist. Ct. 1997).

14 Whitton, No. 393-956.

circumstances is presented. At the conclusion of the penalty phase, my co-counsel gave a very good closing argument in support of the death penalty, but we saved many of our best points for my rebuttal (a strategy that worked well during the guilt phase). This time, opposing counsel looked over at me, stood up, and waived his closing argument. I was not allowed to give a rebuttal, and the jury—who never heard my Alamo—recommended a life sentence.

CONCLUSION

It has become fashionable for lawyers at cocktail parties to boldly declare that trials are "over" by the end of voir dire or opening statement. That nothing counsel says or does during closing argument will change the outcome of the trial. Do not listen to them. They are not your friends. Approach every closing argument as if only one juror is on your side—a juror who will never know the facts as well as you, and who will only remember a fraction of what you say during closing argument. For your own sanity, convince yourself that juror will become a Lion.

Resolve that, before the start of closing argument, your litigation team will have already (1) identified the most likely prejudicial remarks by jurors and decided whether/how to directly address that prejudice; (2) decided whether/how to address compromise; (3) identified a "turning point" in the trial to present to the jury; (4) identified the exhibits that the jury should call for during deliberation; and (5) agreed on your "Alamo."

Make certain your counsel is committed to preparing friendly Lions for the carnage of deliberation. Then wait and listen . . . for the silence of the Lambs.

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John Jerry Glas is a partner and the Vice-Chair of the Civil Litigation Department. He has tried more than seventy jury trials to verdict, and serves as an Adjunct Professor at Loyola University Law School, where he has taught a Trial Practice core curriculum class every spring semester since 2009. Mr. Glas has lectured locally and nationally on cross-examination, jury selection, traumatic brain injury litigation, and qualified immunity for police officers.

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From 2012 to 2015, Mr. Glas has been named to the Best Lawyers® in America, which is issued by Woodward/White, Inc., of Aiken, S.C., and is based on an exhaustive peer-review survey in which more than 41,000 attorneys cast almost 3.9 million votes.

Mr. Glas was recognized by Missouri Lawyers Weekly for obtaining the fourth largest defense verdict in 2012 based on the jury's zero verdict in Fahy v. TASER International, Inc., and the $9 million settlement offer made on the eve of trial. During that ten day trial, Mr. Glas served as lead trial counsel for TASER, and made the strategic decision to rest without calling any witnesses.

Mr. Glas was named to the New Orleans CityBusiness "Leadership in Law" list of 2012.

Mr. Glas received the Louisiana State Bar Association's 2009 Pro Bono Publico Award and the Federal Bar Association's prestigious Camille Gravel Public Service Award for providing eight years of pro bono post-conviction representation to an inmate on Angola's death row. That representation ended on October 2, 2008, when the court vacated the death sentence with the consent of the State and the victim's brother.

Practice Areas
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- Civil Litigation
- Personal Injury Defense
- Police Liability
- Premises Liability
- Products Liability
- Transportation

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