**Tip: Tab 11--Organizing Witness Statements and Folders**

- Some cases involve numerous witnesses which prompts the need for deliberate organization

- Using subfolders is one way to effectively organize multiple documents and witnesses

-- For the Electronic Notebook, create and label a subfolder for each witness

-- For the physical Trial Notebook, thin folders (usually manila or brown without pockets) typically fit in the file box hanging folder, the accordion folder, or the 31-part folder

- In cases with many witnesses, counsel may utilize a second physical notebook just for witnesses and evidence

-- The witness list and evidence list can be used to start a separate index for information contained in a second notebook

-- Some counsel use a separate folder for each statement to be used in court which contains the original exhibit and copies for the court…how many copies should you make?

--- Original for court reporter (identify this with sticky note or other ID)

--- Plus a copy for the judge, each counsel (trial and defense), and each member

--- Keep your working copy in or near the folder as well (with highlights and notes)

--- Keep an extra copy for impeachment or refreshing recollection of a witness (which may become an appellate exhibit…you don’t want your last copy going into evidence leaving you without a copy)

--- Make copies after marking the exhibit number so you don’t have to label each copy

--- Organize your documents early enough to coordinate with co-counsel, the case paralegal, and the court reporter at least one duty day before trial