

OBJECTION CHEAT SHEET

OBJECTIONS TO THE WITNESS	PRIVILEGES
Info will not help Trier of fact	Trade Secrets
Insufficient foundation to qualify expert	Attorney - Client
Not beyond experience of layperson	Marital Communication
New scientific technique not qualified	Doctor - Patient
Opinion based on unreasonable material	Confessor - Confessant
Incompetent Witness	Waiver of Privilege
Inability to observe, remember & communicate	Self-incrimination
Inability to understand duty to tell truth	RESPONSE TO OBJECTION
No personal knowledge	Relevant
lawyer as Witness	COMPETENT TO TESTIFY
Judge as witness	Exception to Hearsay
Lacks expert qualification	Party Admission
MOTION TO STRIKE	Waiver of Privilege
Answer inadmissible	OBEJECTIONS TO FORM AN ANSWER
Nonresponsive	Argumentative
Evidence inadmissible	Narrative
No time to object	Nonresponsive
Insufficient foundation	Assuming Facts Not in Evidence
Witness unavailable for Cross	Speculation
OBJECTIONS TO EXHIBIT	Inconsistent with Pleadings
Confuses the issues	Parol Evidence Rule Violated
Cumulative - Needless Presentation	Best Evidence Rule Violated
Evidence Speaks for Itself	Privilege
Excluded by Pretrial Order	Stipulation Violated
Lack of Authentication	Hearsay
Improper Character evidence	Not the best evidence
Irrelevant (Immaterial)	Beyond the scope of direct
Hearsay	Beyond the scope of cross
	Document speaks for itself

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Jiyuan Zhang



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