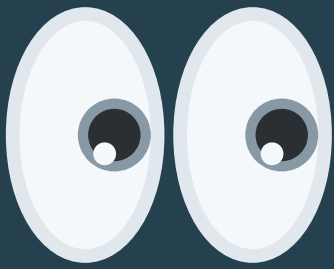


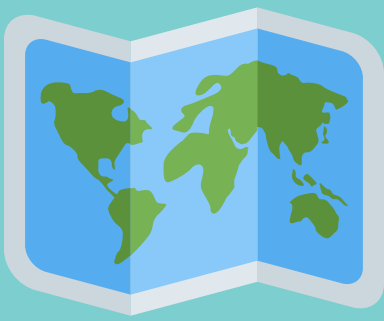
Tips from an appellate lawyer

How to write a great summary of argument



GRAB THE JUDGES' ATTENTION

The first sentence in your summary of argument is the *most important sentence in your brief*. Don't waste it with something bland and trite. Be a little creative.



GIVE THEM A ROADMAP

Besieged by long briefs, judges crave an immediate overview. That's what the summary is for. Tell them where you're going, and how you'll get there.



SHOW THEM THE EQUITIES

What is the one point above all else you want the court to remember? Distill that into commonsense language that strikes at fundamental fairness, and put it in the first paragraph of your summary.



HIGHLIGHT YOUR KILLER FACTS

Focus on just a few critical facts—the ones that should win you the case. Don't be afraid to quote snippets of the record for (subtle) emphasis.



KEEP IT SHORT

The longer your summary of argument, the less interested the judge. So keep it concise and proportional to the overall brief. It's called a *summary* for a reason.

"The summary of argument is the most important section of your brief...."
~ Judge Raymond Kethledge