

TRIAL OBJECTIONS LIST

1. **The Form of Question:**
 - a. Leading: Rule 611 (c)
 - b. Argumentative
 - c. Confusing
 - d. Unintelligible

2. **Subject Matter Of Question:**
 - a. Assumes fact not in evidence
 - b. Asked and answered
 - c. Beyond scope of direct [or cross exam or redirect or recross]: Rule 611 (b) (1)
 - d. Insufficient foundation for hypothetical

3. **Substance Of The Evidence Sought:**
 - a. Hearsay: Rule 801 and following
 - b. Irrelevant: Rule 401
 - c. Violation of best evidence rule: Rule 901
 - d. Question calls for conclusion: Rule 701
 - e. Self-serving
 - f. Violates Parol Evidence Rule
 - g. Document speaks for itself
 - h. Not qualified to give answer: Rule 701 and 702
 - i. Invades province of jury

4. **Incompetence of Witness to Answer or Exhibit to Be Received:**
 - a. Rule 701, 702; Rule 601 (a) and (b)

5. **Failure to Lay Proper Foundation :**
 - a. Inadequate qualifications of witness: expert
 - b. Inadequate preliminaries for substance of conversation
 - c. Mental capacity of child of tender years not established: Rule 601 (b) (2)
 - d. Inadequate premise established for opinion

6. **Failure to Lay a Proper Foundation for Intro of Exhibit:**
 - a. Posed photograph
 - b. Lack of proof that conditions are same
 - c. Material variance
 - d. Foundation for Exhibit lacks reliability
 - e. Failure to establish mechanical reliability of machine

7. **Impropriety of Circumstance:**
 - a. Answer nonresponsive
 - b. Court refuses to give instructions tendered
 - c. Court to giving instruction tendered by opponent over objection
 - d. Objectionable comments by opposing counsel during opening statement or closing argument
 - e. Asking prejudicial or improper questions
 - f. Improper conduct of counsel
 - g. Prejudicial conduct of Judge
 - h. Improper display of Exhibit not received into evidence
 - i. Making improper remarks while registering objection