



## **Guidelines for Presenting Information**

The following guidelines will govern the presentation of information, both by way of testimony and exhibits.

### **Oral Testimony**

1. Information will be offered through witnesses giving testimony, subject to their agreeing to follow the ground rules for witnesses attached.
  - a. Testimony will be presented through in-person testimony, unless the parties agree and advise the arbitrator that they wish to present the testimony in one or more of the following formats:
    - i. By telephone or video call
    - ii. By sworn affidavit
    - iii. By sworn deposition
2. Testimony will be presented in the following sequence
  - a. Direct testimony offered through the guidance of the attorney for the party offering the testimony.
  - b. Questions of clarification presented by the attorney for the other party.
  - c. Questions of clarification from the arbitrator
  - d. Follow up questions by the attorney for the other party
  - e. Follow up questions by the offering attorney.
3. Testimony by be presented on the claims and cross claims to avoid recalling a witness.
4. Questions of the offering attorney shall request testimony in a narrative format, without leading the witness.
5. Questions by the attorney for the other party shall not

- a. Be disrespectful. ("Let your conversation be always full of grace, seasoned with salt, so that you may know how to answer everyone." Col 4:6)
  - b. Assume or imply motives (they should ask for clarification). ("Do nothing out of selfish ambition or vain conceit, but in humility consider others better than yourselves. Each of you should look not only to your own interests, but also to the interests of others." Phil 2:3-4)
  - c. Be argumentative. ("Do everything without complaining or arguing." Phil 2:14)
6. All questions of witnesses shall follow the format of speaking truth, in love. ("Do not let any unwholesome talk come out of your mouths, but only what is helpful for building others up according to their needs, that it may benefit those who listen. And do not grieve the Holy Spirit of God, with whom you were sealed for the day of redemption. Get rid of all bitterness, rage and anger, brawling and slander, along with every form of malice." Eph.4:29 - 31)
  7. Questions shall avoid requesting the witness from providing duplicative information previously presented by other witnesses.

## **Exhibits**

1. Exhibits shall be presented by
  - a. Stipulation
  - b. By a party through a sponsoring witness who can establish the relevance and reliability of the exhibit.
  - c. Testimony should provide sufficient information to establish the context of the exhibit, but should avoid simply reading the document to the arbitrator. The witness can highlight important sections of the exhibit and the reason for the same.

2. The attorney who has not stipulated to the admission of an exhibit shall advise the other attorney of any objection to the exhibit prior to the hearing.

## **Stipulated Facts**

The attorneys should agree and submit in advance of the hearing all facts which are agreed to by the parties to avoid unnecessary time presenting such facts in the form of testimony or exhibits.

## **Oral Arguments and Statements of Counsel**

1. All statements and arguments of counsel shall
  - a. Be presented in a respectful and considerate manner. (Col. 4:6)
  - b. Not imply or assume motives of other persons. (Phil 2:3 - 4)
  - c. Shall be truthful ("Do not lie to each other, since you have taken off your old self with its practices." Col. 3:9)
2. All references to legal authority shall also note to the arbitrator if there is contrary legal holdings, providing distinguishing information.
3. Be presented with consideration of the biblical principles, which govern or inform any statement or position.