

It's like Nick Saban says, "You don't win football games in October and November. You win the football games in June, July, August before you even step foot on the field on a Saturday." So those are the kinds of things that we bring to the table in every case at Morgan & Morgan.

When you talk about appellate lawyers, like Shannon Carlyle, the pre-trial collaboration is so critical to the success of your case because if you don't get it right during trial, and if you're not properly preparing pre-trial, whatever goes on at trial and then post-trial in the appellate arena is too late. And what I mean by that is, you think about the issues that are critical to your case, evidentiary issues. What evidence do you need to get into trial? And what is going to be the attack the defense brings to that particular piece of evidence? And with a lot of arguments it's kind of within the discretion of the court. So, you better make sure that you've got the case law that backs up every piece of evidence that you want in.

Now, importantly, the flip side of that is the defense always comes at every one of your cases with evidence that it probably is inadmissible because it's unfairly prejudicial or it's just not probative, meaning it doesn't prove any material issue of the case. You need to make sure that you block unfair evidence from coming into trial. And the way you do that is by way of pre-trial.

And so when you have somebody like Shannon Carlyle on your team, making sure that all the I's are dotted and T's are crossed, it is critical to your trial success. And importantly, if you've done all the pre-trial work, you get the appropriate pre-trial rulings from the judge, that makes the trial run smoother. And if the defense comes up and tries to inject evidence that the court ruled was inadmissible, then you have grounds for post-trial appeal. So the collaboration is critical on so many different facets of the case.

Your reputation matters. So if you have somebody who has vast appellate experience, when he or she is somebody like Shannon Carlyle, when they stand up before the 5th District Court of Appeals on your case on appeal, the gravitas that somebody like Shannon brings to podium, when she's speaking on the issues that are in your case, that matters.

So they tend to give ... I mean, look, judges are human. They're going to defer to ... there's a close call, to a lawyer who has the requisite reputation. Somebody who's been before them before. So I'd say that matters. And then with Shannon Carlyle, I mean, she's been around for a while. She's had ... been in many battles, tobacco cases on behalf of our firm and medical malpractice cases, products liability cases, so she has seen a wide gambit if you will, of types of cases. So that matters because when you're talking to Shannon Carlyle about an issue pre-trial, she has in her repository of knowledge and experience, "Okay. I remember I've had this come up before and here's how we dealt with it." So experience matters. Trial and error matters. Maybe the longer we do this, the better we get, right? So experience really does matter.

I describe her as a person first. You know, I've known Shannon for 20 plus years. She is just an amazing individual, very, very nice kind, warm, loving. And I say that because that matters. It matters when you start talking about your clients. If you don't have compassion and empathy for your client, you're never going to be a great trial lawyer. And I'd say the same is true for an appellate lawyer. I mean, you get somebody like Shannon Carlyle, who cares about your client, and who is a warm, loving, human being and she's an incredibly bright person. So, she brings the passion and love and empathy for human beings that had their lives dramatically changed by horrific unexpected injury and the requisite high level intellectual capacity that she has with all that appellate experience as a lethal combination. So, the compassion and the intellect is what she brings to every case.