

Fox Rothschild Podcast**Texas Family Law Podcast Series: Jury Consultants and Witness Training**

Featuring Laura S. Hayes, Erin Garza and Jamie-Lee Denton of Fox Rothschild LLP and Ryan A. Malphurs, Ph.D., of Delphi Litigation Strategies

Laura Hayes: Hi, I'm Laura Hayes and welcome to our Texas Family Law podcast. This is part two of our series with Dr. Ryan Malphurs of Delphi Litigation Strategies, explaining to us the effective use of a jury consultant, as well as witness training, from the very outset of a case. Welcome back, Ryan.

Have you, since COVID and learning how to operate in the new world on Zoom or on video, have you had to change the way you work with clients to prepare them for testimony or being in the courtroom? Is it all the same, or is it different?

Ryan Malphurs: It's very different. One of the factors we have really been working on is that my partner used to work at a television studio, so when everything shut down and we were sitting around talking about what the next steps needed to be, we spent some time putting together online mock trials and getting those set up. He also said, in the zoom space, everyone is giving these terrible zoom presentations and calls, their background is terrible, where the camera is sitting is terrible, or their lighting is terrible. So, he put together this kit for around \$300 to \$400 that we recommend to all of our witnesses who are going through an online deposition now, or even attorneys who are giving an online deposition now. So, they're able to have a green screen, or a professional background, and helping them with this process.

If it was hard to train a witness in-person, it is even more challenging to do over zoom. It requires far more time, it requires technical expertise now, it requires equipment that an individual may need, it may require them to actually go to an office and find an office environment to rent so they have a professional, quiet space. We've had billion-dollar cases during this time where our main witness is testifying via zoom in their kitchen and their kids are walking around in the background, or their spouse is getting juice out of the fridge. It doesn't look professional. I think if I could offer any kind of professional guidance to you all, this zoom situation or environment is going to continue, but make sure that you are appearing professional—that you have a professional background, the height, the lighting, the audio, that you have everything you need. It's not expensive. You just need to put together the right components to put yourself in the best light, no pun intended, but to really make sure that you're coming off as best as you possibly can. So many of your peers are not taking that step, and it will differentiate you from your competitors, your colleagues, and elevate you to a place where you've got far greater respect from those on the zoom platform than you would without

and having your kitchen background or an informal environment where we're typically conducting the zoom training sessions, or calls, or depositions, or hearings even.

Laura Hayes: Right, and I think that goes back to what you said a few minutes ago where it's a race to credibility. Having the testimony, whether it's a trial or a hearing, on zoom as an extra layer of credibility. Like you said, if you're in your kitchen, the judge isn't inclined to think that you're taking it as seriously, or you might have an inappropriate background that you don't even realize is there because you think it's just a small screen that shows your face and your coffee cup with a funny saying is in the background and the judge focuses on that. The judge makes a judgement of you based on a coffee cup, or something along those lines. It adds an extra layer to your...

Ryan Malphurs: Well, something even worse that you don't anticipate, is that the notebook that you sent to your witness to review for documents that will be coming up in the case, they may write notes on them and have them there during the deposition that's going on, not realizing that they're not supposed to have them there, opposing counsel can subpoena the very documents that they're looking at. Now your entire trial strategy has been revealed to the other side. That's devastating, and it's something that many people don't realize.

We do what are called tech checks before a hearing, or before a deposition, where we check in with the witness, or our attorneys, and we have the witness literally show us what is on their desk with their camera, what is on the space, because we have had clients, even when we've said you cannot have anything in front of you and they'll say OK, and sure enough they didn't realize the notebook with all of their notes and whatnot, that is there, too, and they didn't think that was relevant. Well, it is, and it can suddenly be subpoenaed by opposing counsel, and it has in some cases. It's led to a very crazy scenario where key strategy notebooks have been subpoenaed by opposing counsel because the witness had it right there in the deposition.

Laura Hayes: Right, and that is something that attorneys have had to adjust to as well. If we're in the same room with our clients, we know what they're looking at, or not looking at, but you never know what clients are doing from the comfort of their own homes. You're right, big documents could be right there, and if opposing counsel see them, it's huge if we're not prepared and we don't prepare our clients. Having someone like you to notice those things, in addition to preparing the client, is very helpful to the case overall. Again, as lawyers, we have to learn the strategies of presenting our cases on zoom because that's even carded, cross-examining a witness is very different on zoom than it is in the courtroom, especially when you're juggling documents—see page four, where is page four? It takes away a lot of the impact sometimes. Having the clients really prepared and knowing the pros and cons of zoom and how that can really affect your case because I think zoom, on a certain level, is here to stay for litigation. I think courts are obviously opening back up in most states, and we're going to go back to in-person trials, but a lot of the judges are doing hybrid methods where they are trying to have some of their hearings on zoom and some of them in-person. I think our clients need to

know that is a possibility, and to be prepared for both. Some judges will change it last minute, too.

Ryan Malphurs: Yeah, and I think that is where a little bit of practice actually becomes an advantage for some attorneys. I mention this because I'm seeing it more and more with one firm that I'm working with in particular. He's an attorney in his early sixties and he has learned how to quickly move through documents in zoom in ways that overwhelms the actual witness. He's walking them through, line-by-line, and he has everything so well organized that he is using the cognitive momentum of not only the admissions, but the document, to gain admissions from witnesses that they probably never would have given if they had physical documents in front of them. So, he is sort of using the magic of zoom and the technology of it to overwhelm the witness.

It's an amazing tactic, and it's one I would encourage attorneys to think about because the prevailing view is that it is harder to cross a witness—I don't disagree with that, I think it is—but there is another advantage that we are seeing that you all can leverage, which is the cognitive momentum and the mastery of evidence to quickly move through it, overwhelms witnesses in ways that they are not accustomed to as well. For whatever reason, because they're not seeing the person next to them or in front of them, they are more willing to agree and relay and trust that individual because they're not able to keep up with it. There is a weird power dynamic that is also occurring that I think attorneys can sort of leverage for their benefit that we're beginning to recognize, too.

Laura Hayes: That's an interesting point. I think it's very important because, I don't know how this will play out, but I assume that judges are no longer going to make witnesses from out of town come in town for trial, and they're going to allow more of this online testimony. Obviously, I think that parties are still going to have to be in person if it's an in person trial, but if you have a multi-jurisdictional case and you have witnesses in multiple cities, I think the judges are going to allow a hybrid model. So being well aware, both from the witness perspective, if you're the one being examined, knowing that's a tactic of trying to hurry through documents and teaching them to take a deep breath and relax. Also teaching the attorneys how to do that so we can take advantage of the witnesses going through the documents faster.

Ryan Malphurs: Add another layer to that, which is, is your Wi-Fi connection strong enough, is your lighting good enough, is your laptop fast enough to pull up these documents. There is a new technical area that we are seeing failures in that we didn't encounter before. Case and point, there are sometimes that Wi-Fi just fails on you, right? And you want to have a hard wire connection, but you want to learn that early—you need to get a 100 foot ethernet cable, and you need it because your witness is in rural Kansas and doesn't have great Wi-Fi, so better to have it tied directly into their broadband network. Learn that in advance because when you're in a \$50 million case and the hearing drops, they're testifying, and the jury is going, "what's happening?" That's on you, the attorney. That reflects on your credibility and how the jury is evaluating you and evaluating your witness. It's an unfortunate and avoidable situation, but

because it's new, we don't always know about these. The more we can plan, the more we can get out in front of it, the better off your credibility with the jurors, the better off the witness's credibility is going to be. There are kind of all these technological aspects that we're not thinking about as well that's really important to consider.

Laura Hayes: Yeah, that's a good point. If your computer crashes, or your Wi-Fi doesn't work, and you call in on your phone, it's a completely different look and it's a completely different feel.

Ryan Malphurs: It may not be admissible. We were in federal court and we had to make sure everything went smoothly. There is no room for failure when opposing counsel has mailed you sealed documents and you have to open them on camera, and there are certain time limits we're held to within certain federal jurisdictions. The clocks running and the feed goes out, well, your clock is running, and the jury is not appreciating you wasting their time and they're not appreciating what's happening with the witness, and now the witness is frazzled. There is a lot on the technology side that I think we've been able to help—calming things down, smoothing out, and making sure that this is a good, viable, safe process going forward.

Laura Hayes: Right. I think this goes to the overall perspective of going to court, whether it's in the beginning of the case, or the big multi-million-dollar jury trial, it's all about preparation from different angles. Attorneys are focused on, these are the pieces of evidence that I need to get in with each witness, and this is my story, but the clients have to be just as prepared for what is coming at them. How they're going to testify when their attorney is talking to them, how they're going to testify when they are being cross-examined, and how they keep their composure if something happens—if they lose their Wi-Fi, what do they do? Planning is not just "how do I attack my spouse?" There are so many different angles to look at that a lot of litigants don't realize when you're going to trial or going into the courtroom.

Ryan Malphurs: Yeah, the courtroom is probably already the most challenging environment to try to communicate and message in for a witness—direct has its challenges, cross has even greater challenges. So knowing how to deflect opposing counsel's arguments, and how to still be responsive, how to admit your errors, own any of your wrongs, and then be able to communicate those, either get in front of them on direct or clean them up on re-direct is a very strange process. Now you overlay that with the technology challenges, and it becomes even more complicated. We have a client we're working with now who has only 15 percent of her hearing and is having to testify via zoom because she can't travel, she's unable to travel. So now we're dealing with transcription process and how the delay that's involved there in addition to how the documents are being communicated, it's incredibly challenging.

Laura Hayes: I'll bet. I understand, not from that perspective, but I've had interpreters. I had a client who is in another country appear on zoom and then the interpreter is on zoom here. There is delay anyway, but there is extra delay when your client testifies, then the interpreter has to go. It creates a lot of people talking over each other, in which case either the client or the

court reporter misses a whole lot. So, it's preparing for those issues as well that is definitely a different challenge. There is always a challenge when you have interpreters, or different unique aspects, but having it on zoom or video is even more difficult.

Ryan Malphurs: Yeah, and I think we're going to see that for at least the next five years as COVID runs its course nationally, and the vaccines are slow to roll out in some areas and faster in others. This is going to be a continued issue for some time. I think attorneys are just going to have to begin adapting to it and find out how to leverage it for their own purposes. It's not only a shortcoming. There is an advantage there as well, but you have to be able to recognize it and be able to use it for your advantage.

Laura Hayes: Right. These are things that I think just emphasize how important it is to get you involved from the very beginning. Again, if the clients come to us, they want to tell us their whole story, they want us to prepare the entire case and there is only so much we can do. We have to prepare the case, and we have to get the evidence ready, and we have to subpoena the witness, but someone like you can add the balancing act to help the clients prepare for all these other angles that wouldn't necessarily, if you just had the one or few attorneys on the case involved, you can point out all of these other areas that need to be looked at. If you come in with the entire team, having worked with the clients and prepared for this, there is such a huge difference in the presentation when you're involved vs. the cases where you're not.

Ryan Malphurs: Even you as attorneys are so overwhelmed by the facts sometimes, right? Getting the motions filed and getting the evidence ready. There is a lot of mechanical science you all handle in your daily work, and it's hard for you to sometimes see above that fray. What I really like to do is also spend time with you all working on compelling narratives—how do we tell the story of this case? How do we get this to be something that the judge appreciates as a human being, because I think sometimes attorneys think that judges are automatons and just kind of spit out rules as they come, but they really are human. Jurors are really human, too, so how do we need to weave our message with our witnesses to be able to connect with the judge, or how do we need to admit wrongdoing when that was there and be able to ask for forgiveness, or say your sorry, or show you've turned a new leaf and are somebody who is different now. All of that is difficult to focus on when there is a flurry of motions and challenges that are coming at you, but also what I really try to work with you all on is, what is the narrative? How are we going to tell a story? What evidence do we have to be able to back this up?

There are two different types of narratives. One is, what is out persuasive narrative, but what's out counternarrative for opposing counsel. How do we frame the opposing party as somebody who is a threat to their children, or somebody who is a threat to their spouse, or somebody who doesn't deserve x y and z, or who wasted money? There are multiple narratives within every case, how do we develop those, how do we use them for both offensive and defensive purposes, is a really critical component as well. Oftentimes we've learned that, many times through the time that I spend with witnesses, when I'm learning these new personal stories, these personal

narratives. We can storyboard it and whiteboard it to make sure it's part of the information that you're able to communicate to the judge or to the jury.

Laura Hayes: Right, putting all the pieces of the puzzle together in the most persuasive manner and you can help with the opening statements and the closing statements. If you're in trial with us, we're so busy making sure that we're objecting appropriately, or getting through the questions we need for our witness, you kind of have a different perspective because you can watch from a psychological perspective. Body language, or a shifting in the seat that we don't see. We're focused on the witness and what they're saying, and you can notice all of these other things from a psychological perspective that can completely change the way the trial goes, too.

Ryan Malphurs: Absolutely, and sometimes even during breaks, it's a good time for me to grab a witness and say, "you're not coming across the way that we want you to." Or sometimes to the attorney, "the questions you're asking are not effective. They're not landing with the jury, you're coming off flat, you need to make sure that you're connecting this." Again, there's a theater to this. Sometimes attorneys forget that there is this process that is going on, but you have an audience, and this audience needs to understand your message. What is that message? How do we show up in the most effective light and the most persuasive light? That's a really important component.

Laura Hayes: Right, absolutely. I think you made a good point early on. We're talking about how involved you are. I think some client think, "oh my gosh, I'm paying my attorney this huge hourly rate already, or multiple attorneys, having you involved is going to get so much more expensive." But it doesn't necessarily have to. Like you said, starting out early on can help the case settle, and having you involved at the trial can make the case go in a completely different direction—pointing out that the witness isn't doing the things you had trained them to do, or the attorneys' questions aren't coming across as effectively as we thought. Having you involved can change in a lot of ways and is definitely worth it.

Ryan Malphurs: Yeah, and there are some clients who come to us and say, "this client has x amount, what can we do?" and we'll lay out a game plan. We'll meet with the client and kind of talk through it. They need to be aware of the most pressing issues to where we can be the most effective. Then in the gear up toward trial, let's talk about getting them through the temporary orders hearing, and the mediation and/or the deposition. What is that going to look like? Then let's talk about, as we're headed toward trial, what is the testimony going to look like? Do we need graphics? Do we need a graphics person to come in and put together a timeline? Do you need them to highlight geographical locations and movement between those locations? There are very simple ways that you can make this an easy process, but oftentimes giving the client the option to even meet with us, or talk about our involvement can be very beneficial, just so that they can then say yes or no, or here's what I'm willing to spend now. That's perfectly fine, but don't necessarily take away that choice from the client just because you're assuming that they are a polished professional, or just because you're assuming that they are not going to want to do that. Let them have the strategic advantage if they want it.

Laura Hayes: Absolutely. Something you talked about, too, is now that we're doing this hybrid method being on zoom, a lot of judges are posting it on their YouTube or making it publicly available. Courtrooms have always been publicly available unless there is a special circumstance, but now that it's broadcast for anyone in the world to see, I think it's even more important how you present yourself. You have the big CEO who might have something really cool against their spouse and wants to slam them in court, but that may not come across when their colleagues, or when their business competitors see the way they've presented themselves in the courtroom. It might affect them professionally as well. I don't think a lot of our clients think about that part of it.

Ryan Malphurs: Yeah, or conversely, what if that CEO has something that is incredibly embarrassing? How do they own that? Or if they start arguing with opposing counsel and they come off as jerks, how is that going to impact them? I think you raised a really interesting point that we have oftentimes been in the position of how do I embarrass my spouse—skewer them on the stand, I want them so embarrassed for what they've done, make me feel good about this process as the client. This takes it now to a very different level, you have the theatrics of we're going to capture all of this on YouTube and I'm going to post it to all of his or her professional groups that they belong to and associations. This is going to destroy his career as well. That presents kind of a very different component now with these zoom trials and people being able to capture and replay them on YouTube. Now, I will say this, the trials that I have been involved with that are being streamed, there is a prohibition on recording. That offers a layer of protection because judges don't like for those rules to be thwarted, but it also into a failsafe.

Laura Hayes: It's definitely not. You don't know who is watching and who is recording. That may be hard to prove if a random stranger posts the recording—tracing it back may be very difficult.

Ryan Malphurs: And if you have somebody who is outside the jurisdiction of the United States, that can be challenging as well. I think there is a host of implications in this new world that we're facing, but in the family law space it's even more perilous, it seems like to me.

Laura Hayes: Definitely, it's a little bit scary when we talk about it this way.

Ryan Malphurs: Our parade of horrible, right? As we kind of move through this. It's interesting to see how things are going to change, and how things are going to go back to the same.

Laura Hayes: Absolutely.

Jamie-Lee Denton: Ryan, we've talked a lot about prepping someone on how they're going to speak, but what about how they're going to act—their mannerisms? How they're going to dress? It's one thing for us to tell our client don't wear a revealing shirt, or don't wear bright red

lipstick, but coming from you, I feel like you can address it in a better way. So, could you just kind of touch on how you address those things?

Ryan Malphurs: Yeah, as someone who is an academic who then stepped into the jury consulting space, my sartorial choices were not the greatest to begin with and I was not that concerned about fashion. It became something that again and again clients expressed anxiety about what do I need to wear. There is a prevailing theory about color, and what colors are better to wear, and so we talk with the witnesses a little bit about that, but ultimately it's coming down to how that attire is reflecting them as people within a professional environment.

If you all have seen a courtroom, it's very much kind of the structure of a church. Jurors see it as a sacred space, judges see it as a sacred space—there is a chancel railing, there are pews, there is a place for the important guests like judges and jurors and witnesses to sit. It very much follows the architecture of an actual church in many respects. When you're able to explain to them, here is what you need to wear within certain professional areas of performance, that begins kind setting into place.

There are many witnesses I have who want me to pick out their outfits. I will generally, with the attorney, be copied in on various messages of here are my outfits, what should I wear, here are my various combination of suits and ties. We kind of laugh at that's so silly, but it's amazing how much that calms a witness down—male or female—if they know, on Monday I just need to put this suit on, put this dress on. On Wednesday, I'm just going to wear this. I think it's Barack Obama who would have the same suit that he would wear with different ties every time to reduce the decision making that he would have to make each day. I thought that was a really interesting tactic, I'm not sure I would take the same approach, but it speaks to how even the extraordinary get overwhelmed by the daily choice. If you can just take that choice away from them, it can make it that much easier.

You shouldn't assume that someone is going to show up in professional attire. I had a surgeon I was working with in Indiana, and the gentleman showed up to jury selection, this was July, with a Santa Claus tie with jingle bells on it. I was horrified. He thought this was very humorous, but as a surgeon whose credibility was on the line, this is not the professional attire, this is not the professional message you want to send to the jury on the first day of jury selection. I had to take my tie off, give it to him, and I had to pick a jury with this Santa Claus tie on with jingle bells on it. I had another client who flew in from India and he had packed his favorite suit that he was going to wear. This guy was our expert, he was very critical to the case. With this one firm I worked with, I met every single witness before they take the stand, so I go to meet with him and he pulls up with this suit and says he has the most fabulous suit I'm going to wear. He holds it up and it is eggplant in color, it's silk and it's completely wrinkled. He's going to be testifying in two days and I turned to him and was like, you are not wearing that, I'm sorry but you're not wearing that in small town Texas in federal court. This is not happening. I had to send he and the secretary to go to a nearby town and pick out a suit for him that was gray, dark in color, a blue shirt, a red tie, and was professional in appearance. Those are very critical discussions to

have, and you shouldn't take them for granted because sometimes even our witnesses that live in the professional space, or live in an everyday environment in which certain attire is acceptable—that attire is not acceptable in the courtroom.

Jamie-Lee Denton: I do feel like in the zoom space it's become, someone wakes up, they're going to testify from their kitchen. They don't think about putting on something professional or think about all the people they're going to see. So, I have seen some of our witnesses, like that's not going to work tomorrow. Let's address this now. So, have you seen anything different in the zoom space?

Ryan Malphurs: We have not, but we address that kind of immediately. We don't make those assumptions, we address it up front, but you see all these reports—the weatherman that didn't have his pants on. The top down performance that for some reason they forget to put clothes on. Obviously, that's an intention decision, but they're making that decision because they're not seeing it as a professional space. So, you have to make sure that they're still seeing it and treating it as a professional space. It's hard to do that when something is occurring in your living room, or in a bedroom, or in a closet. It's just a very difficult mind frame to get in that you think you can get away with casual attire from the waist down, and that's not acceptable.

Laura Hayes: It goes back to your whole presentation, too. I've had cases where we're going to the courthouse and someone is trying to say they don't have any money and they show up in their Porsche, Ferrari, Lamborghini. The juror that they don't know is going to be on the jury, is parked right next to them and can see them. It's the whole demeanor of the entire day that can affect every little aspect, and it's not something that can be—you have to plan, you have to prepare. You can't just think about it, "oh I forgot to tell them not to drive their Porsche today." The clients don't think about it. We have to think about it and help them with that. You never know if that guy or girl in the elevator is going to be on your jury, you may want to behave properly from the second you leave your house that day. It's the whole presentation.

Ryan Malphurs: Yeah, we call it the jury face. The first thing you do in the morning is put on your jury face. That's because you never know, if you step out onto the road and you're driving, who is driving next to you who is not what they seem. We had a situation where we were in Ft. Worth and our attorney had been running behind, so he had cut off a car and thrown an inappropriate signal. He remembered the car and it turned out to be a potential juror in our pool. We had to burn a strike on that individual because we weren't going to risk somebody seeing opposing counsel. They recognized each other and it was very clear there was some animosity there. Attorneys have to be mindful of that as well. So, yes, we talk to our witnesses about putting on your jury face.

Laura Hayes: Makes sense.

Erin Garza: When you're talking about things to be mindful of when you're going to trial, and the race to credibility and the moment you step into the courtroom, the jury is evaluating you. Have you seen a difference, more so in state court depending on where the trial is taking place, how the jurors interact with the witness based on what they're wearing, how they carry themselves, or even their profession?

Ryan Malphurs: Sure. One of the elements I think is really important, is that in situations in which you're unfamiliar, humans are unfamiliar, and by this I'm going to be referencing jurors. In any situation in which humans are unfamiliar with an environment, the first thing we begin doing is assessing it with our eyes. Visual cues, what you're wearing, how you conduct yourself, what type of jewelry you're wearing. Those are all being evaluated in very specific ways by jurors, and it's important you are mindful of that because showing up to the courthouse with an overly expensive car is not a great sign. Walking around with a Starbucks cup even has its own connotations, and there have been jurors that have been critical of that, we've gotten that feedback. Because attorneys live in this environment, because witnesses become accustomed to it, sometimes they're desensitized by how acute these evaluations are by jurors, but the visual assumptions that jurors sometimes make are really sometimes terrifying. You need to be mindful of them at all times.

In addition to shows like "Lie to Me" that was about micro expressions, or people who play a lot of poker, or people who focus on law and order shows, have a stronger sense of being able to identify when they think people are lying. They're not able to. We know based upon the research within the social science space, there is only about a 51 percent chance, just a little more than half, of whether people can detect a lie or not. But when people have this background, they have the perception of confidence that they can see and identify a lie. That means mannerisms on the stand can be very dangerous if they're not held in check, and if witnesses aren't aware of them.

We had a witness recently that had Tourette's and it was a situation that we hadn't encountered before, but it was a welcome challenge. The first thing we did is address that the witness had Tourette's on the stand. One of the aspects that manifested a tic or a slight response in her neck is stress and we knew that she was going to be stressed on the stand so we wanted to bring it up right away so jurors were not wondering, they were not trying to gauge it as a way that she was trying to mislead the jury or lie to them, it was actually something that was a neurological challenge that she had.

Laura Hayes: It's interesting. I've heard and I hope you agree that judges and jurors are human just like us and they make their judgements pretty quickly. Even if we're set for a week long trial, or multiple week trial, how you present yourself from the very beginning, they're already making the judgements, whether it's how you testify, or if you approach things like this, they've already made judgements against this witness, but if you don't fix it until 30 minutes into the testimony, the judgement has already been made. It's hard to correct those. Same thing with the judge. If the way you present your opening argument, and the first witness you call, that can totally

change the trajectory of a case. We all start to lean once we hear the initial facts, or see the initial mannerisms or demeanor, and if you don't address those until later on, it may be too late.

Ryan Malphurs: Yeah, or how does one demeanor in a temporary orders hearing, how is that evaluated when the judge knows that in all likelihood there has been some coaching that has occurred so they can come back and appear more polished. Sometimes witnesses will turn and try to message or communicate to the judge and the judge is focused on their computer screen because they're doing something else, but the witness doesn't realize the acute hearing that judges have, so they think the judge is tuned out and doesn't care. Then they lose their polish and their attention to the messaging and the communication, and sometimes they can get indignant thinking that the judge isn't paying attention. There are all these challenging dynamics that are occurring within the courtroom based upon misassumptions and mis-assessments,

Laura Hayes: Right. Well, Ryan, this has been very fascinating. I really appreciate you appearing on our podcast today.

Ryan Malphurs: Absolutely. Thank you for having me, it's been a lot of fun.

Laura Hayes: Thank you.

Ryan Malphurs: You asked me to tell you what my favorite movie was.

Laura Hayes: I did. I was going to say, we end our podcast with what's your favorite divorce-related movie or tv show?

Ryan Malphurs: It is "Couple's Retreat." The reason I like "Couple's Retreat" is because it has what I think are good typologies of different types of couples, and the dysfunctional behavior that occurs in each of those environments. It's a very funny movie, but it really works well if you think about who your clients are and how each of your clients and the relationships they have are stereotyped within these four or five couples that are in the movie. It's an interesting one.

Laura Hayes: Absolutely. I'll have to, I haven't watched it in a long time, but now I think I will. Thanks, Ryan.

Ryan Malphurs: Thank you.