Essential Rules for Deposing on Behalf of the Plaintiff

University of Texas School of Law CIE
Winning at Deposition: Skills and Strategy
October 22, 2015

Jim M. Perdue, Jr.
Perdue & Kidd
Houston, Texas



What Do I Need?







Think of Priorities

- Level 1 Essential Liability
 - ODe fe ndant
- Level 2 Supplemental Liability
 - Officer
 - \circ Witnesses
- Level 3 Damages and Trial
 - OCausation Medical Proof
 - ODamage witnesses



Think of Priorities

- Level 1 Essential Liability
 Risk Manager
- Level 2 Supplemental Liability
 - OEmployee Witnesses
 - OSupervisors
- Level 3 Damages and Trial
 - OTreating medical providers
 - ODamage witnesses



Think of Priorities

- Level 1 Essential Liability
 - ODefendant Care Providers
- Level 2 Supplemental Liability
 - OSupervisors for Policy and Procedures
 - OCollateral care providers
- Level 3 Damages and Trial
 - OSubsequent treaters
 - OAdverse Experts







Find the full text of this and thousands of other resources from leading experts in dozens of legal practice areas in the <u>UT Law CLE eLibrary (utcle.org/elibrary)</u>

Title search: Essential Rules for Deposing on Behalf of the Plaintiff

Also available as part of the eCourse

<u>Depositions: Winning Strategies, Judicial Perspective, Winning Documents and Essential Rules for Deposing on Behalf of the Plaintiff</u>

First appeared as part of the conference materials for the 2015 Winning at Deposition: Skills and Strategy session "Essential Rules for Deposing on Behalf of the Plaintiff"