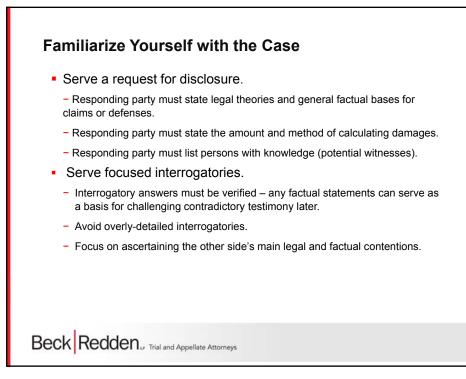




Familiarize Yourself with the Case

- Know the legal issues in your case:
 - Study elements of the claims, counterclaims, and any affirmative defenses.
 - Know what questions will be submitted to the jury.
 - Review the pattern jury charge, if applicable.
- Investigate your client's side of the case:
 - Identify the key witnesses on both sides and their roles in the underlying events.
 - Consider the motivations of the key actors.
 - Interview your witnesses.
 - Review your client's documents.
 - Organize the information you learn; a chronology or "hot" documents folder can be very useful.

Beck Redden ur Trial and Appellate Attorneys



Learn the Documents

- These can be a most important resource.
- Contemporaneous documents give you:
 - Early familiarity with the facts.
 - Insight into both sides' positions when underlying events were unfolding.
 - A source of questions for deposition.
 - Ammunition to combat an untruthful or difficult witness.
- Organize your documents by:
 - Isolating the most important documents.
 - Constructing a timeline of events.
 - Constructing a narrative.

Beck Redden w Trial and Appellate Attorneys

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: Deposition Lessons I've Learned Through the Decades

Also available as part of the eCourse 2016 Winning at Deposition: Skills and Strategy eConference

First appeared as part of the conference materials for the 2016 Winning at Deposition: Skills and Strategy session "Deposition Lessons I've Learned Through the Decades"