

Developing Cannonball Cross Examination Through The Adverse Deposition



PRESENTED BY DAWN ESTES
2017 WINNING ADVERSE DEPOSITION: SKILLS AND STRATEGY
UTIAW- AUSTIN, TEXAS
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Cannonball!



VIDEO CLIP



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Effective Cross Through Use of an Adverse Witness Deposition Takes 2 Steps:

Shake and Bake, Baby!



2 Steps to Shake and Bake

1. DEPOSITION – SEEKS INFORMATION
2. CROSS EXAMINATION – PRESENTS INFORMATION TO THE FACT-FINDER



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Deposition Tip:

PRELIMINARY QUESTIONS TO ASK YOURSELF

1. How will the deposition be used?
2. Who will likely read this deposition?
3. When is the deposition being taken?
4. Will the witness likely come live to trial?
5. Who will be with you?
6. Who is this witness anyway? –
Big Picture/ Close-up



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[Answer Bar: Going to Trial on an Employment Law Case](#)

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