

# Developing Cannonball Cross Examination Through The Adverse Deposition



PRESENTED BY DAWN ESTES  
2017 WINNING ADVERSE DEPOSITION: SKILLS AND STRATEGY  
UTIAW- AUSTIN, TEXAS  
AUGUST 24, 2017

## Cannonball!



## 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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## Title search: Developing Cannonball Cross Examination Through The Adverse Deposition

Also available as part of the eCourse

[Answer Bar: Taking Your Car Crash Case to Trial](#)

First appeared as part of the conference materials for the  
2017 Winning at Deposition: Skills and Strategy session  
"Developing Your Trial Cross Through the Adverse Deposition"