



**DEPOSING THE
VENTRILOQUIST'S
DUMMY**

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DCR DEPOSITIONS
DEPOSITIONS OF CORPORATE
REPRESENTATIVES



SECONDARY RESOURCES

- pgold@agtriallaw.com;
- Kosieradzki, **30(b)(6), Deposing Corporations, Organizations & Government** (Trial Guides, 2016);
- Wise and Wooten, ***The Practitioner's Guide To Properly Taking and Defending Depositions Under the Texas Discovery Rules***, Baylor L. R., 68:402 (2016)

EXCELLENT OVERVIEW

QBE Ins. Corp. v. Jorda Enterprises, Inc.,
277 F.R.D. 676
(S.D. Fla. 2012)

FED. R. CIV. P. 30(b)(6)

BREAKDOWN OF RULE

- ❖ Applies to all types of entities, parties and non-parties;
- ❖ **Activated by serving topics with reasonable particularity. Must be tailored to claims and defenses;**
- ❖ Entity chooses representative, but must educate representative on composite knowledge of corporation; what is known or knowable by corporation
- ❖ **Representative may be separately deposed as a fact witness.**

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Title search: Deposing the Ventriloquist's Dummy

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

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"Taking the Deposition of a Corporate Representative"