

Essential Rules for Depositions in Tort Cases

University of Texas School of Law CLE
Winning at Deposition: Skills and Strategy
June 28, 2018

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



1

What Do I Need?



2



Think of Priorities

- Level 1 – Essential Liability
 - Defendant Driver
- Level 2 – Supplemental Liability
 - Officer
 - Witnesses
- Level 3 – Damages and Trial
 - Causation Medical Proof
 - Damage witnesses

Think of Priorities

- **Level 1 – Essential Liability**
 - Risk Manager
- **Level 2 – Supplemental Liability**
 - Employee Witnesses
 - Supervisors
- **Level 3 – Damages and Trial**
 - Treating medical providers
 - Damage witnesses

5

Think of Priorities

- **Level 1 – Essential Liability**
 - Defendant Care Providers
- **Level 2 – Supplemental Liability**
 - Supervisors for Policy and Procedures
 - Collateral care providers
- **Level 3 – Damages and Trial**
 - Subsequent treaters
 - Adverse Experts

6

Find the full text of this and thousands of other resources from leading experts in dozens of legal practice areas in the [UT Law CLE eLibrary \(utcle.org/elibrary\)](https://utcle.org/elibrary)

Title search: Essential Rules for Depositions in Tort Cases

Also available as part of the eCourse

[Taking the Deposition in Business or Tort Cases](#)

First appeared as part of the conference materials for the
2018 Winning at Deposition: Skills and Strategy session
"Taking Depositions in Tort Cases"