

Essential Rules for Depositions in Tort Cases

University of Texas School of Law CLE
Winning at Deposition: Skills and Strategy
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What Do I Need?



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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

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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

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