



**DEPOSING THE  
VENTRILOQUIST'S  
DUMMY**

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# DCR DEPOSITIONS

## DEPOSITIONS OF CORPORATE REPRESENTATIVES

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### SECONDARY RESOURCES

- [pgold@agtriallaw.com](mailto: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)

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**EXCELLENT OVERVIEW**

***QBE Ins. Corp. V. Jorda  
Enterprises, Inc.,***

**277 F.R.D. 676  
(S.D. Fla. 2012)**

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

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First appeared as part of the conference materials for the  
2019 Winning at Deposition: Skills and Strategy session  
"Taking the Deposition of a Corporate Representative"