



**DEPOSING THE
VENTRILOQUIST'S
DUMMY**

1

PAUL N. GOLD

AVERSANO & GOLD

HOUSTON, TEXAS

[WWW.CUTTING EDGE JUSTICE.COMM](http://WWW.CUTTINGEDGEJUSTICE.COMM)

2

DCR DEPOSITIONS

DEPOSITIONS OF CORPORATE REPRESENTATIVES

3

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)

4

EXCELLENT OVERVIEW

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

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

5

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

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: **Deposing the Ventriloquist's Dummy**

Also available as part of the eCourse

[2019 Winning at Deposition eConference](#)

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"