



## **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](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)

4

**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)**

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

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

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"