

Overcoming the Problem Witness

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- “Cross Examining the Technical, Difficult or Uncooperative Witness”

2

- Deposition Cross versus Trial Cross
- One size definitely does not fit all
 - Lawyers OR witnesses

3

Deposition

Rule 1

- Don't follow a predictable script

4

- Rule 2
- Never go back once you get a cookie

5

- Some times it's better to SAVE IT for trial
- Some times it's better to save it for later
- Some times it's better to circle around it

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