

# Overcoming the Problem Witness

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1

- “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

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

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- 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

6

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