

Cross-Exam.....Are we having fun yet??

Paula Sweeney
Slack Davis Sanger
Dallas
psweeney@slackdavis.com

1

- Deposition Cross versus Trial Cross
- One size definitely does not fit all
 - Lawyers OR witnesses
- Why am I doing this????

2

Depositions

3

Rule 1. No Scripts

- Don't be predictable
- [and relaxing]
- [soothing]
- [calming]
- Why get the witness comfortable??

4

Q: "State your name"

A: "Dr. Gray"

Q: "Isn't it true it would be speculation to say Ms. Wright had a pulmonary embolism?"

A: "yes sir"

Q: "now, let's get your background, where did you go to med school?"

5

Rule 2. Keep Moving

- Never go back once you get a cookie

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: Cross-Exam...Are we having fun yet??

Also available as part of the eCourse

[Car Crash Trial Tactics 2022](#)

First appeared as part of the conference materials for the
2022 The Car Crash Seminar session

"Cross Examination"