

# Deposing for the Plaintiff

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The Plaintiff's case should be a rush to disclosure.

# Setting Depositions

1. Who do you want to depose?
2. Send a deposition request letter.
3. Send a second deposition request letter.
4. Send a third deposition request letter.
5. Issue a notice.

## Get the Notice and *Duces Tecum* Correct

- Is this individual or corporate capacity?
- Be specific in the *duces tecum*.
- Timely serve the *duces tecum*.
- For organization representatives, narrowly and specifically identify areas to be covered.
- Can you compel attendance?
- State in notice that deposition may be videotaped.

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## Title search: Deposing for the Plaintiff

Also available as part of the eCourse

[2018 Winning at Deposition eConference](#)

First appeared as part of the conference materials for the  
2018 Winning at Deposition: Skills and Strategy session  
"Deposing for the Plaintiff"