

# Essential Rules for Depositions in Tort Cases

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## What Do I Need?

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## Think of Priorities

- Level 1 – Essential Liability
  - Defendant Driver
- Level 2 – Supplemental Liability
  - Officer
  - Witnesses
- Level 3 – Damages and Trial
  - Causation Medical Proof
  - Damage witnesses

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## Think of Priorities

- Level 1 – Essential Liability
  - Risk Manager
- Level 2 – Supplemental Liability
  - Employee Witnesses
  - Supervisors
- Level 3 – Damages and Trial
  - Treating medical providers
  - Damage witnesses

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## Think of Priorities

- Level 1 – Essential Liability
  - Defendant Care Providers
- Level 2 – Supplemental Liability
  - Supervisors for Policy and Procedures
  - Collateral care providers
- Level 3 – Damages and Trial
  - Subsequent treaters
  - Adverse Experts

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