

Mastering The Deposition Process

June 7, 2022

1

1

The Process



2

2

1

2

The Couplet is King



3. Martin Curry - Confidential - December 9, 2020

1 other potential agreement from Mark's? anyone before
 2 just left Mark's tonight?
 3 A. I don't know who said or whether. And the
 4 reason for that - the reason I don't know is because
 5 I'm not a headhunter - you know, unless we were at
 6 Mark's, we had access to that. And, in fact, I can't
 7 have really gotten to know the Mark's family network
 8 before, so only one of certainty, but after we at
 9 either, so sometimes, sometimes agreements are based
 10 on Mark's family or other things, not I might have
 11 demonstrated it, but you know, I would be happy to
 12 be a part of reference in that context, which
 13 obviously would have been better by then.
 14
 15 one way or another.
 16 Q. Do you know whether you kind of personally
 17 took it with you when you left to start the new firm
 18 or that you would have it in some way employment
 19 agreement?
 20 A. I don't know.
 21 Q. (to Mr. Johnson) Okay. So if you look at
 22 this employment agreement, you understand that it was
 23 made up of two parts on the top of page 2?
 24 A. I think so.

25
 26
 27
 28
 29
 30
 31
 32
 33
 34
 35
 36
 37
 38
 39
 40
 41
 42
 43
 44
 45
 46
 47
 48
 49
 50
 51
 52
 53
 54
 55
 56
 57
 58
 59
 60

3. Austin Curry - Confidential - December 9, 2020

1 with their services firm and how they would run things
 2 differently.
 3 And, like I mentioned earlier, my
 4 conversation with Jason that summer - was one of many in
 5 the early period.
 6 And I got to know in the sense that we
 7 were - you know, we had other people were looking
 8 at what we thought were certain objectives of the way
 9 that Michael Smith was run, and we thought we had
 10 better solutions.
 11 But in terms of, you know, this, this, you
 12 know, this is something we're going to do, you
 13 know, this is something we're going to do, you
 14 know, this is something we're going to do, you
 15 know, this is something we're going to do, you
 16 know, this is something we're going to do, you
 17 know, this is something we're going to do, you
 18 know, this is something we're going to do, you
 19 know, this is something we're going to do, you
 20 know, this is something we're going to do, you
 21 know, this is something we're going to do, you
 22 know, this is something we're going to do, you
 23 know, this is something we're going to do, you
 24 know, this is something we're going to do, you
 25 know, this is something we're going to do, you
 26 know, this is something we're going to do, you
 27 know, this is something we're going to do, you
 28 know, this is something we're going to do, you
 29 know, this is something we're going to do, you
 30 know, this is something we're going to do, you
 31 know, this is something we're going to do, you
 32 know, this is something we're going to do, you
 33 know, this is something we're going to do, you
 34 know, this is something we're going to do, you
 35 know, this is something we're going to do, you
 36 know, this is something we're going to do, you
 37 know, this is something we're going to do, you
 38 know, this is something we're going to do, you
 39 know, this is something we're going to do, you
 40 know, this is something we're going to do, you
 41 know, this is something we're going to do, you
 42 know, this is something we're going to do, you
 43 know, this is something we're going to do, you
 44 know, this is something we're going to do, you
 45 know, this is something we're going to do, you
 46 know, this is something we're going to do, you
 47 know, this is something we're going to do, you
 48 know, this is something we're going to do, you
 49 know, this is something we're going to do, you
 50 know, this is something we're going to do, you
 51 know, this is something we're going to do, you
 52 know, this is something we're going to do, you
 53 know, this is something we're going to do, you
 54 know, this is something we're going to do, you
 55 know, this is something we're going to do, you
 56 know, this is something we're going to do, you
 57 know, this is something we're going to do, you
 58 know, this is something we're going to do, you
 59 know, this is something we're going to do, you
 60 know, this is something we're going to do, you

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: Mastering the Deposition Process

Also available as part of the eCourse

[2023 Winning at Deposition eConference](#)

First appeared as part of the conference materials for the
2023 Winning at Deposition: Skills and Strategy session
"Developing Your Trial Cross Through the Adverse Deposition"