

# AVERSANO & GOLD

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1



## DEPOSING THE VENTRILOQUIST'S DUMMY

2

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3

**DCR DEPOSITIONS**  
**DEPOSITIONS OF CORPORATE**  
**REPRESENTATIVES**

4

## SECONDARY RESOURCES

- [paul@cuttingedgejustice.com](mailto:paul@cuttingedgejustice.com);
- Kosieradzki, **30(b)(6), Deposing Corporations, Organizations & Government** (Trial Guides, 2016);
- Wise and Wooten, *The Practitioner's Guide To Properly Taking and Defending Depositions Under the Texas Discovery Rules*, **Baylor L. R.**, 68:402 (2016)

5

## EXCELLENT OVERVIEW

***QBE Ins. Corp. V. Jorda Enterprises, Inc.,***

**277 F.R.D. 676**

**(S.D. Fla. 2012)**

6

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Title search: **Deposing the Ventriloquist's Dummy**

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  
"Depositions of Corporate Representatives"