

# Litigation Academy

United States District Court for the District of Rhode Island  
Roger Williams University School of Law  
Rhode Island Chapter, Federal Bar Association

## Deposition Skills

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# Goals of a Deposition

1. Get information
2. Obtain factual admissions to support a motion for summary judgment
3. Lock in testimony so you can impeach at trial if it changes

# Admonitions Topics

1. “Frame of Mind” admonitions
2. “Clean Transcript” instructions
3. “Prevent Excuses” directions

## “Frame of Mind” admonitions

1. The same oath as in court?
2. The oath requires truthful, accurate, complete testimony?
3. Medications?
4. Any other reason that you can't testify truthfully, accurately, and completely?

## “Clean Transcript” Topics

1. Stenographic recording
2. Spoken answers
3. Speak clearly
4. Only one person talking at a time
5. Objections: answer anyway

## “Prevent Excuses” Admonitions

1. “I didn’t understand that question.”
2. “I was tired, I needed to take a break.”
3. “I needed to talk to my lawyer about that.”
4. “I realized later that I made a mistake when I said that.”