

***“PREPARING” THE
WITNESS***

and

***“DEFENDING” the
DEPOSITION***





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*"I'm not a potted plant. I'm here as the lawyer.
That's my job."*

**Brendan Sullivan to Senator Daniel Inouye, Chair,
Senate Select Committee on Secret Military Assistance
to Iran and the Nicaraguan Opposition.**



Be Prepared... the meaning of the motto is that a scout must prepare himself by previous thinking out and practicing how to act on any accident or emergency so that he is never taken by surprise.

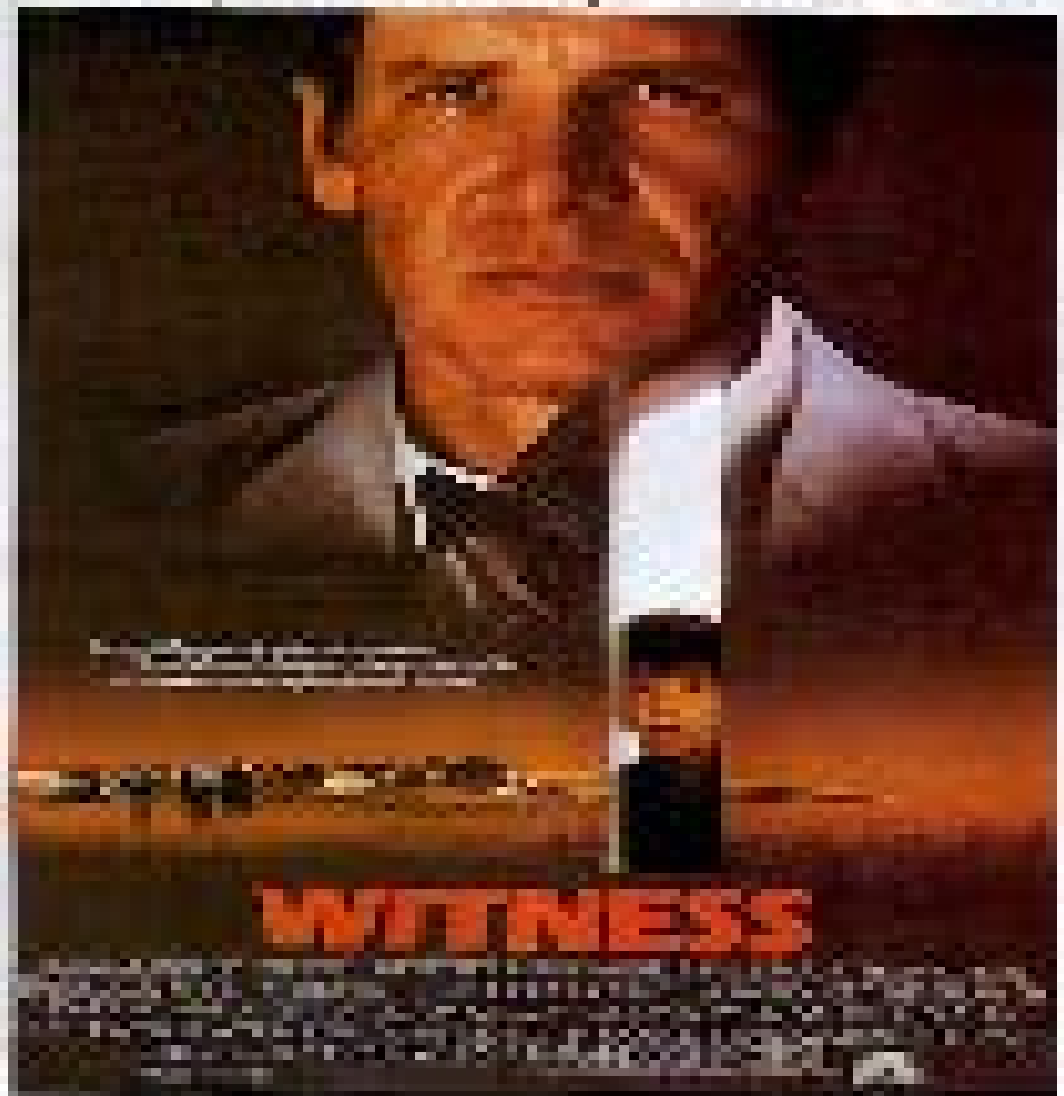
(Robert Baden-Powell)





Harrison Ford Is John Book

BY THE TIME YOU READ THIS, YOU'LL KNOW THE
THE ONLY OTHER NAME IS JOHN... THE ONLY OTHER NAME IS JOHN...







The oldest and strongest emotion of mankind is fear,
and the oldest and strongest kind of fear is fear of
the unknown.

(H. P. Lovecraft)

izquotes.com





P.R.E.P.

- Prepare
- Reassure
- Educate
- Practice

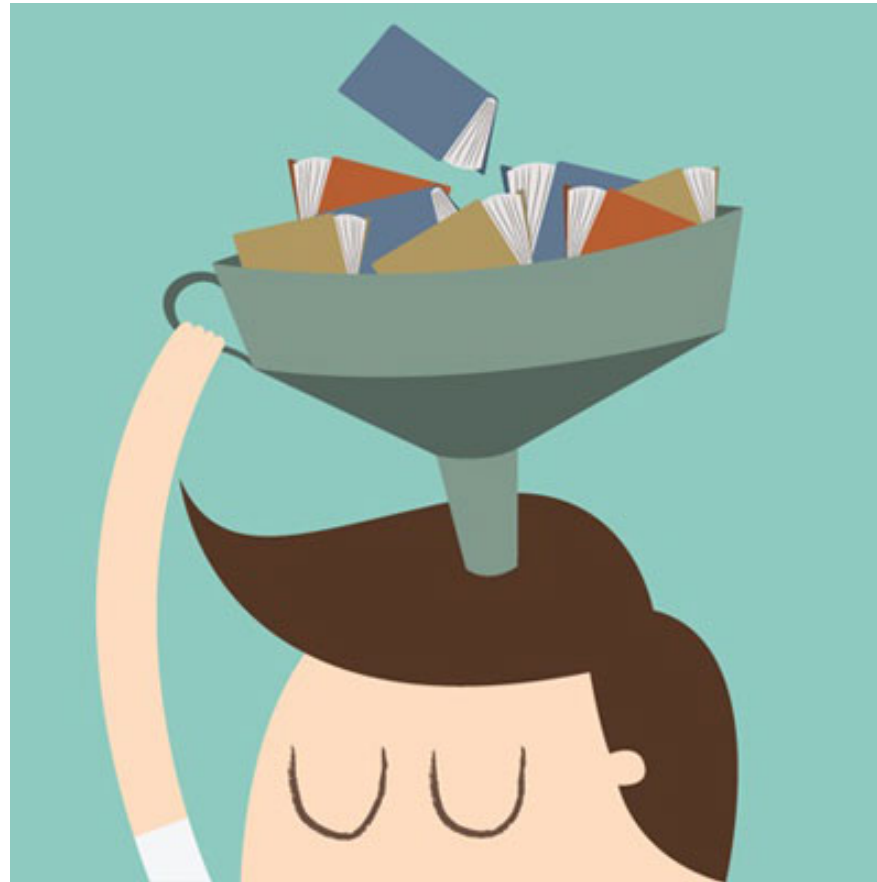


*The witness had been doing so well
at his deposition when suddenly...*

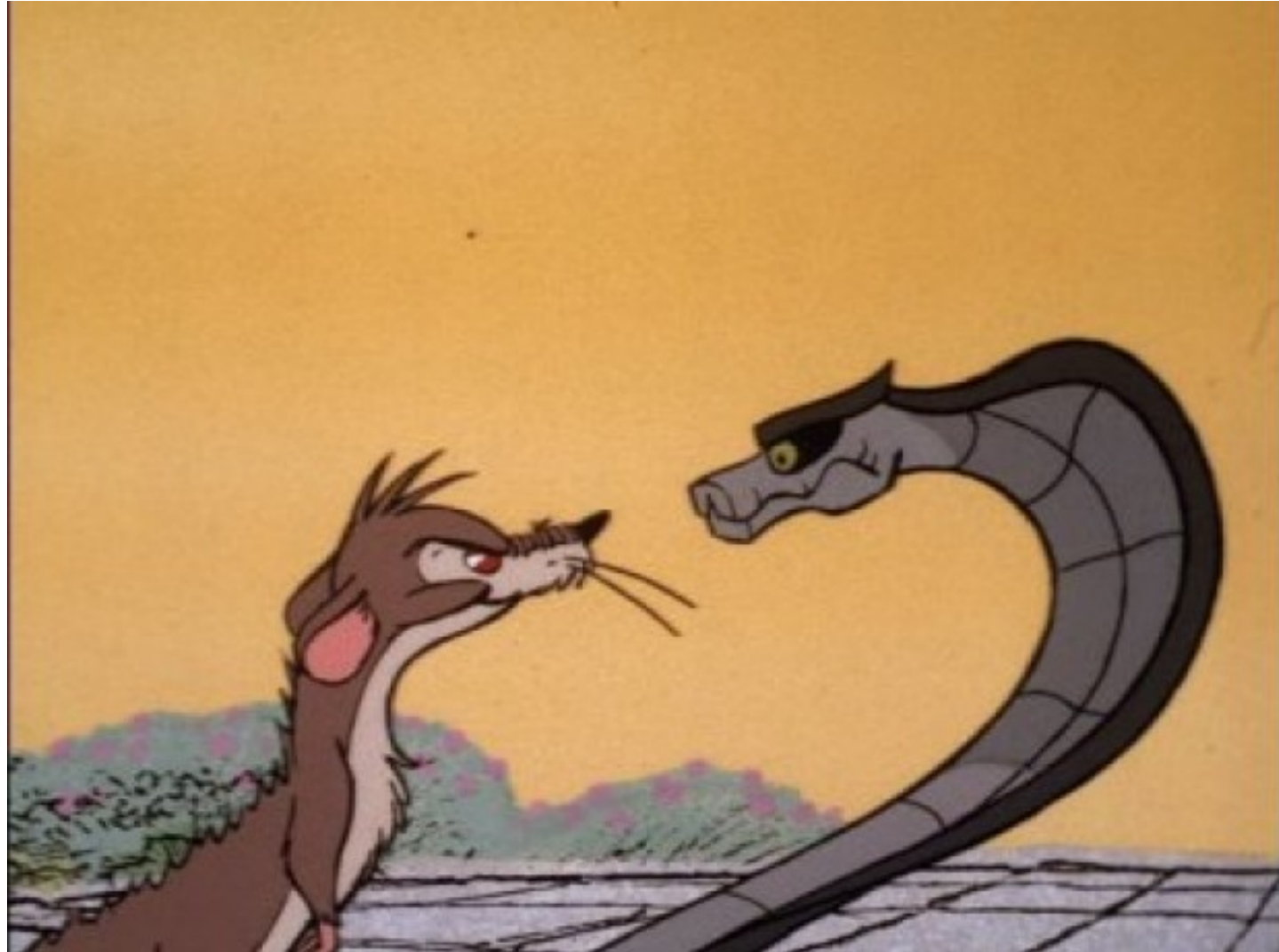




FUNNEL



Reptile Theory & Other Strategies



L.U.T.E.

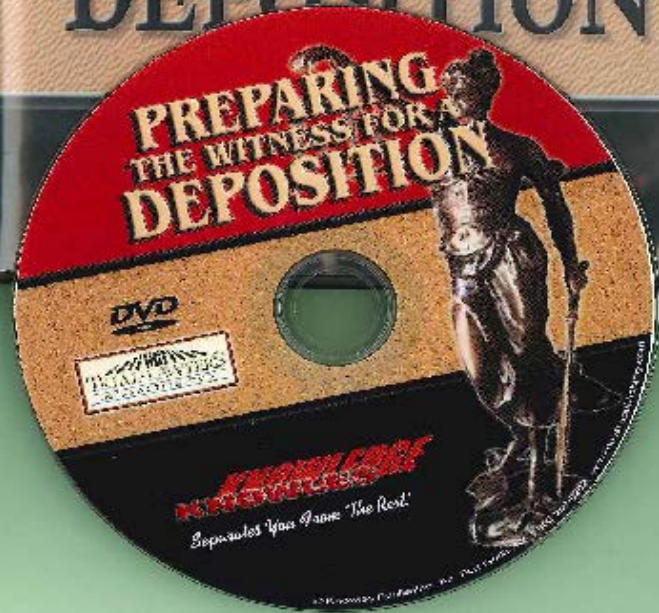
- Listen
- Understand
- Think
- Express



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PREPARING The Witness for a DEPOSITION





JUSTIN BIEBER ENTIRE

COURT DEPOSITION!





American Board of Trial Advocates

**PRINCIPLES OF CIVILITY,
INTEGRITY,
AND PROFESSIONALISM**



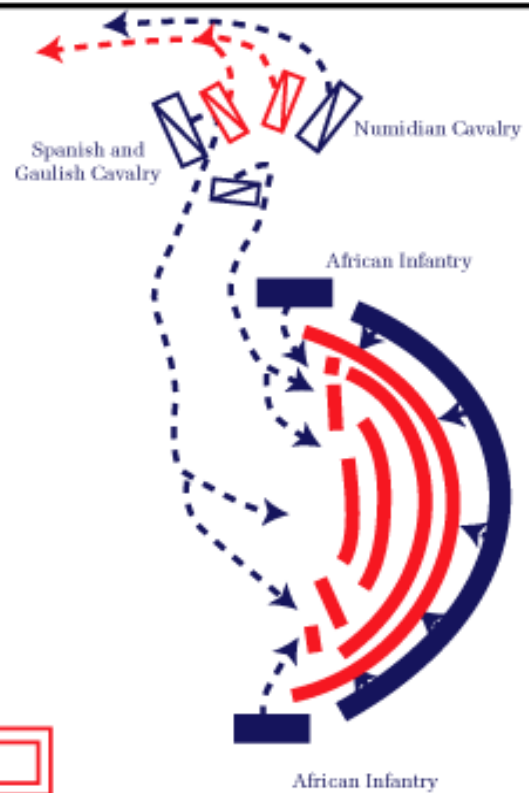
NMC Art

THE BATTLE OF CANNAE

215 B.C.
Destruction of the Roman Army



SCALE OF MILES
0 1/2 1

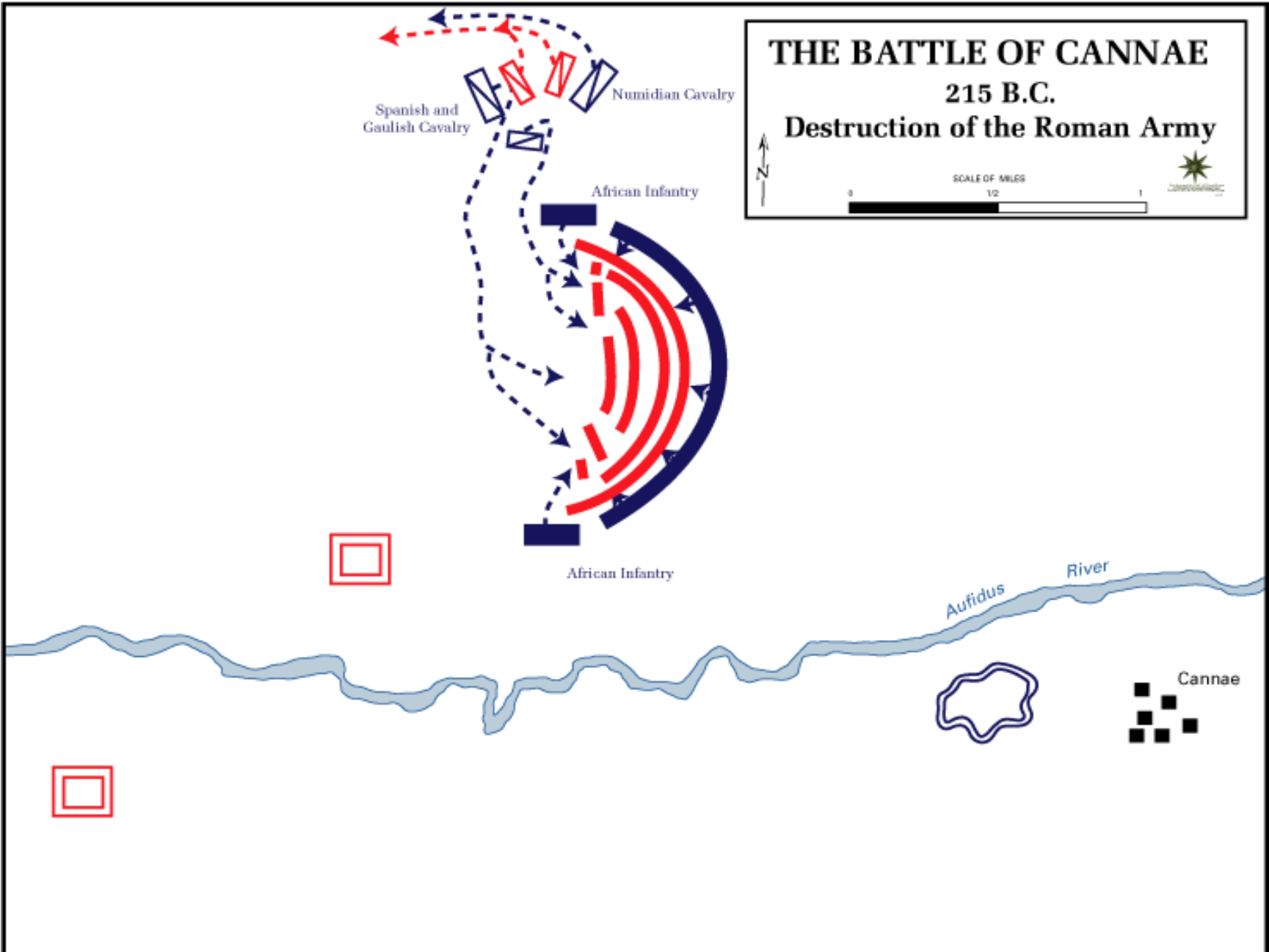


African Infantry

Aufidus River



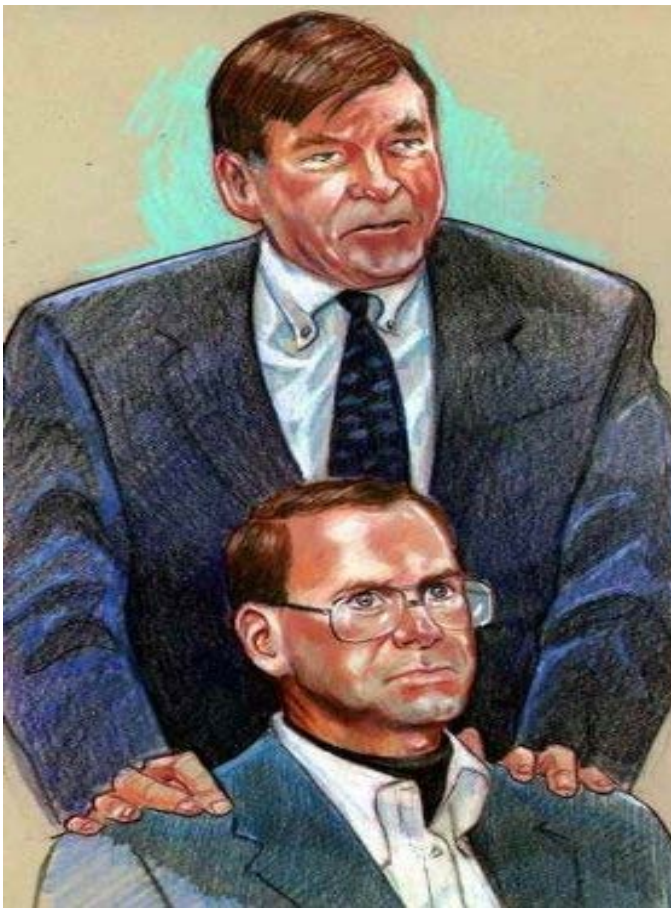
Cannae



RULE 30(b)(6)

Notice or Subpoena Directed to an Organization.

In its notice or subpoena, a party may name as the deponent a public or private corporation, a partnership, an association, a governmental agency, or other entity and must describe with reasonable particularity the matters for examination. The named organization must then designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on its behalf; and it may set out the matters on which each person designated will testify. A subpoena must advise a nonparty organization of its duty to make this designation. The persons designated must testify about information known or reasonably available to the organization. This paragraph (6) does not preclude a deposition by any other procedure allowed by these rules.



***“A TRIAL LAWYER IS A LARGE BLOB OF EGO—
SUSPENDED OVER A CHASM OF INSECURITY.”***

Michael Tigar: Nine Principles of Litigation -- And Life.

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