

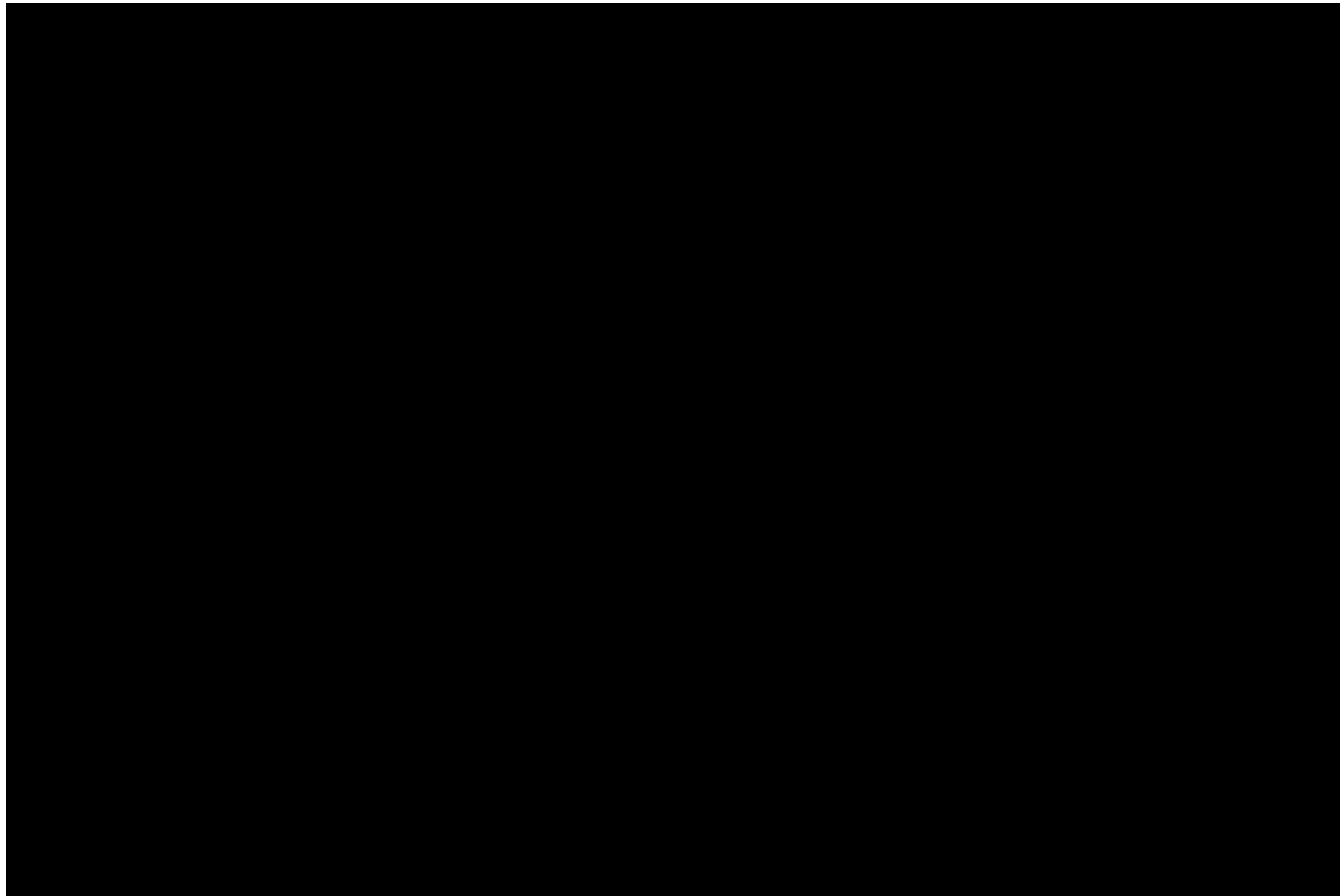


# Winning Deposition Strategies

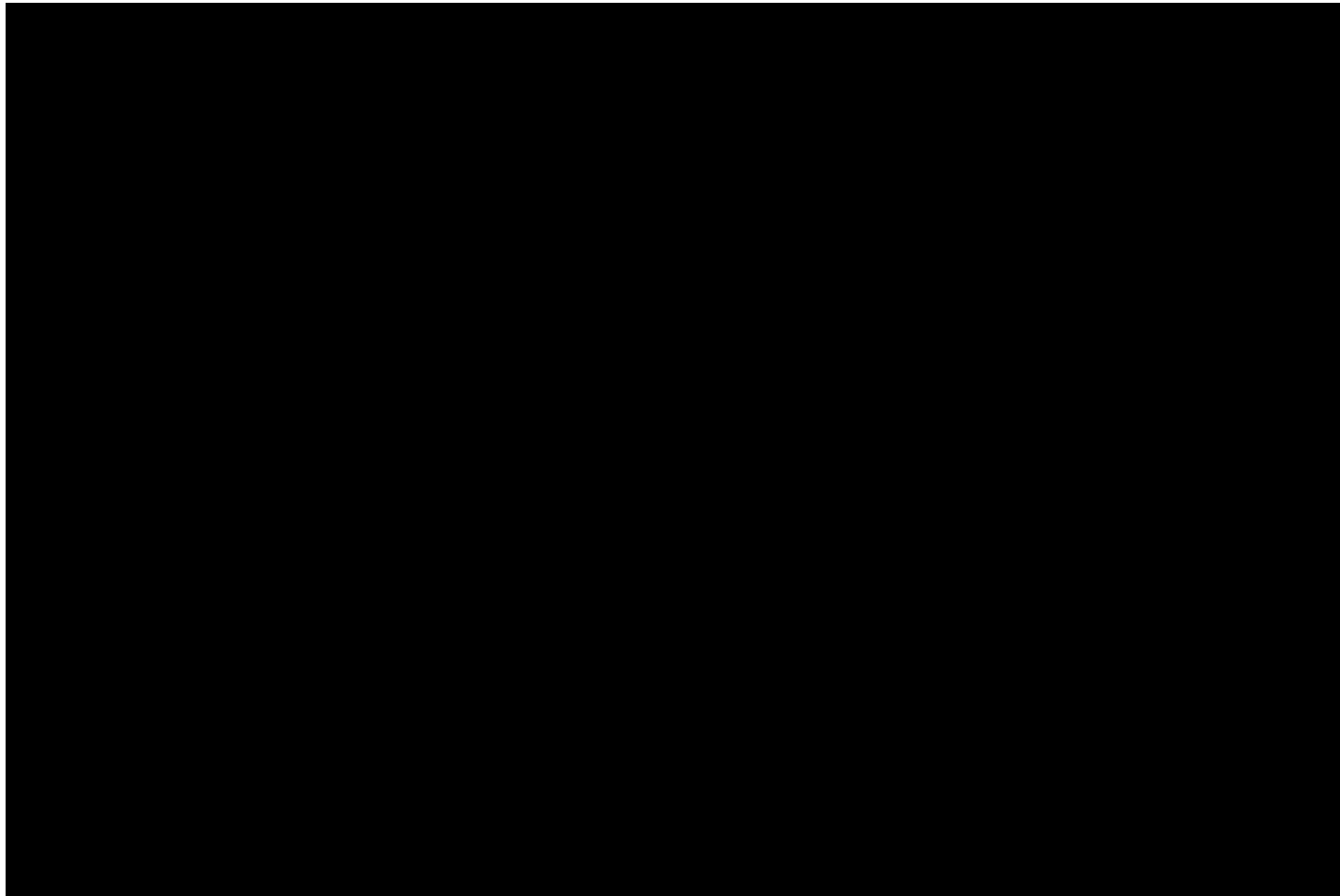
Presented by: Andy Payne

- **Effective Use of Demonstrative Aids in Depos**
- **Editing With Exhibits**
- **Jury Views/On-Scene Depositions**
- **Listen and Mine the Gold**
- **Unexpected Trial Direct Examination**
- **Ask the Money Questions**
- **Knocking Witness Off Balance**

# Effective Use of Demonstrative Aids



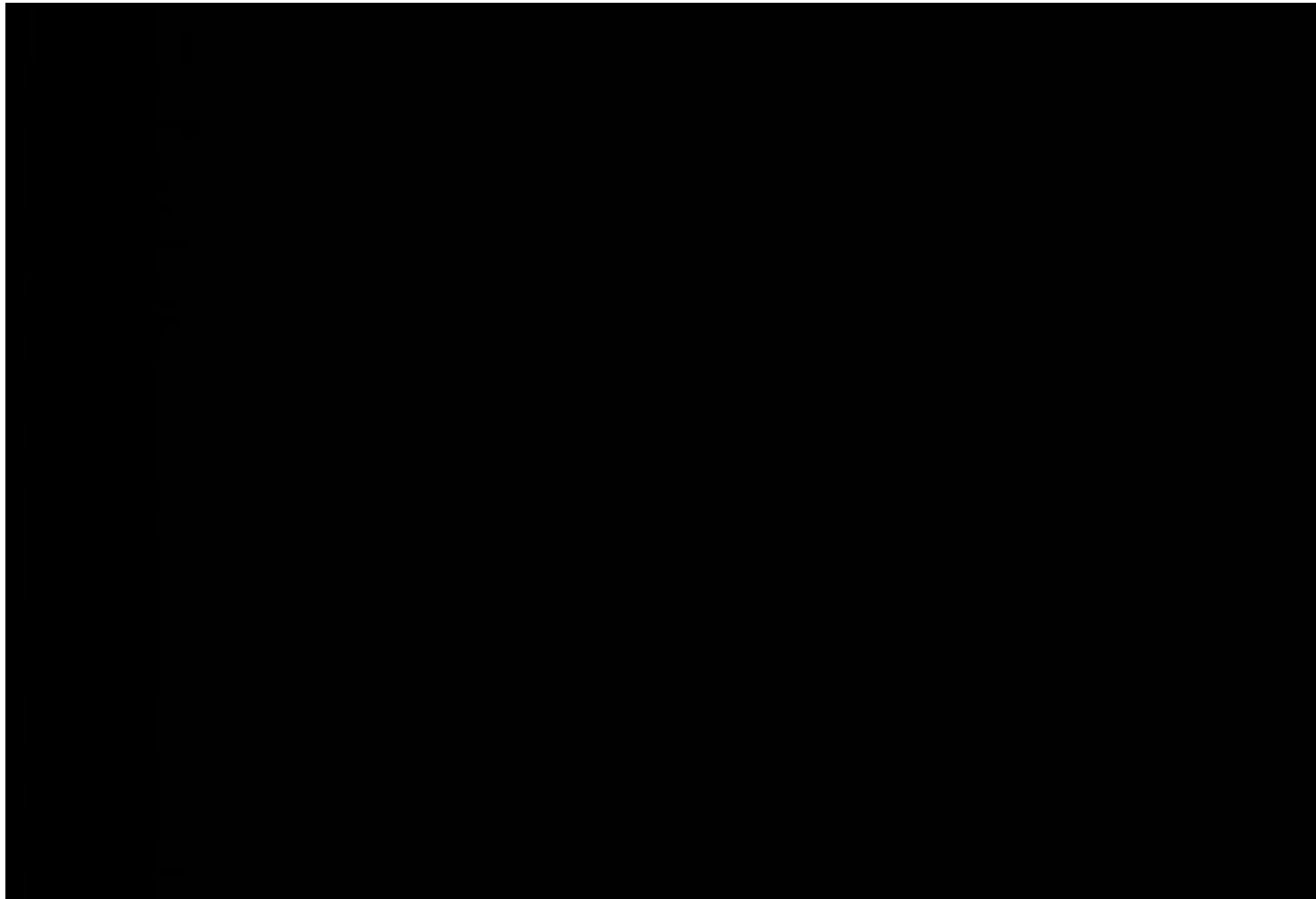
# Editing With Exhibits



# Jury View/On-Scene Depositions



# Jury View/On Scene Depositions



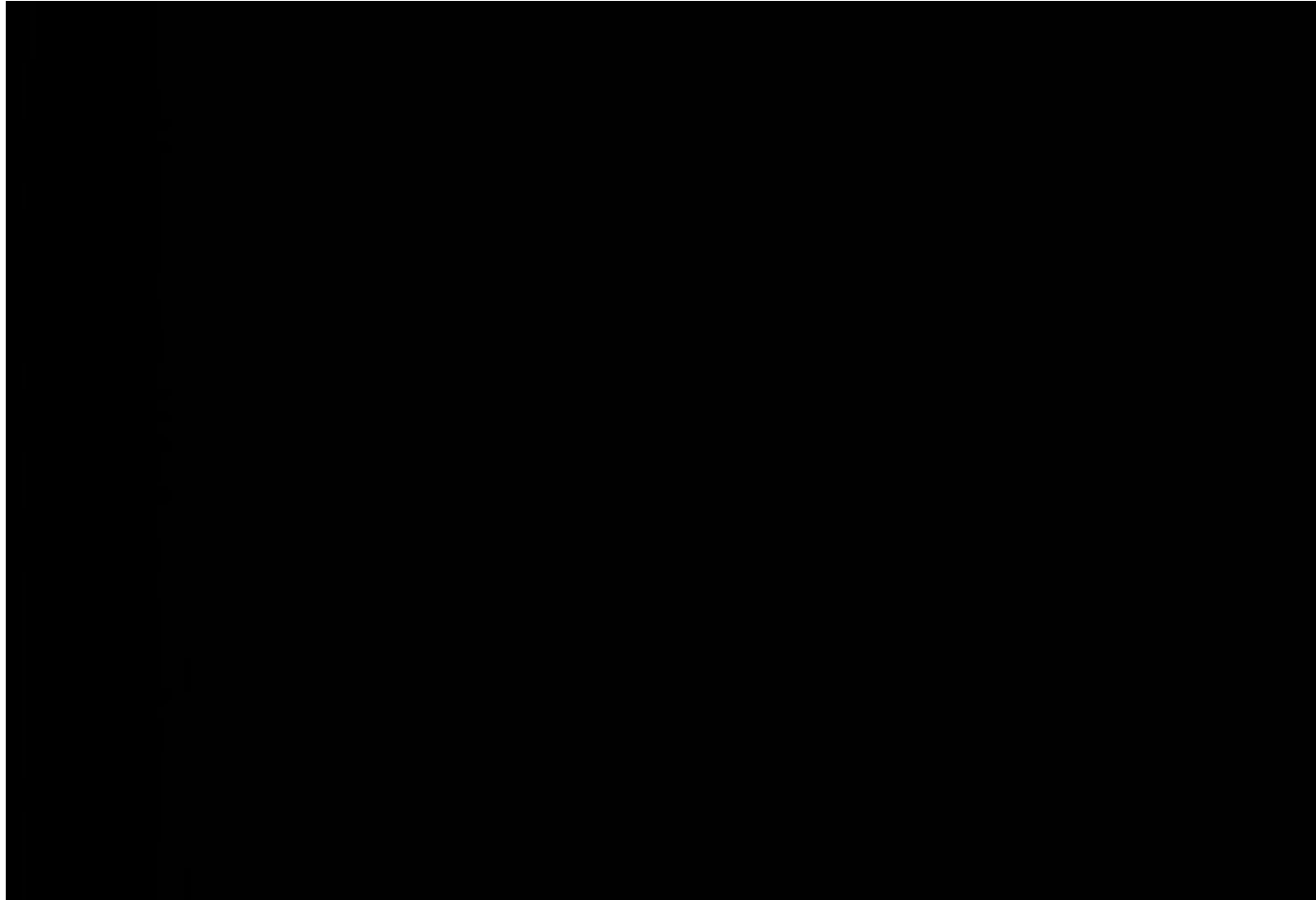
# Listen and Mine the Gold

- **Let the Witness Talk**
  
- **P.S. Use a good videographer**

# Unexpected Trial Direct



# Ask The Money Questions



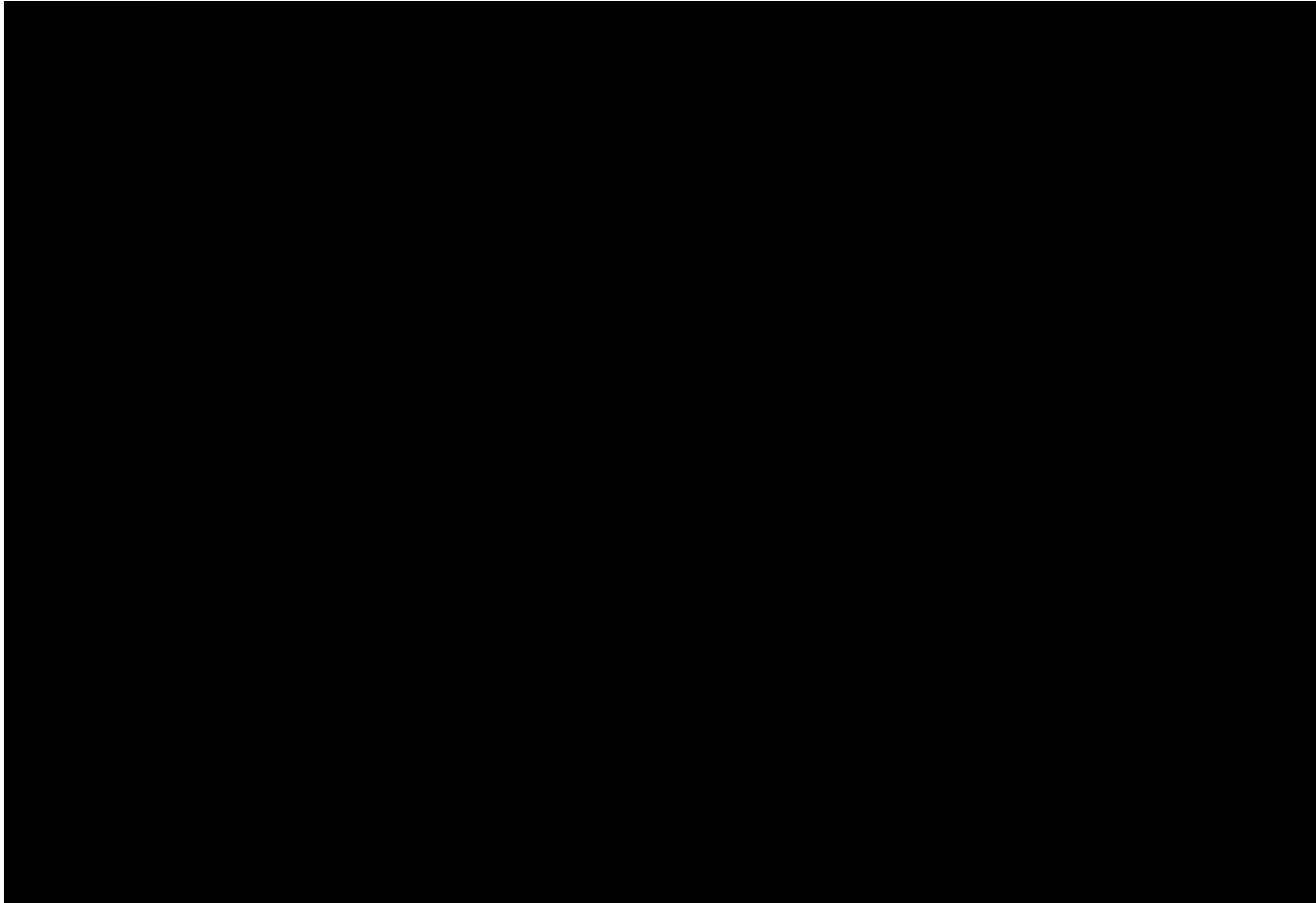
# Ask the Money Questions



# Knock Witness Off Balance

- **Ask Uncomfortable Questions First**
- **With Experienced Testifiers—Mix Up Questions**

# Ask Uncomfortable Questions First





# Winning Deposition Strategies

Presented by: Andy Payne