

**EXERCISE****DEPOSITION WITNESS PREP:  
EXPLAINING MECHANICS & STRATEGY*****Background***

You are helping a partner on your case prepare one of your witnesses for an upcoming deposition. The witness has never testified in a deposition before and is pretty nervous, especially after finding out that it will be recorded on video. The prep session is scheduled for a week before the deposition.

The partner has asked you to take the lead on the first part of the prep session—explaining the mechanics of the deposition to the witness. She wants you to cover everything this witness needs to know about how a deposition works. She's concerned that the witness's nerves might cause problems at the deposition, and is hoping that your part of the prep will help put the witness at ease.

***Instructions***

Come prepared to discuss what you would explain to the witness about the mechanics of the deposition.