

## EXERCISE

# DEPOSITION WITNESS PREP: REVIEWING FACTS & DOCUMENTS

### *Background*

You're meeting with your witness next week to prepare for his deposition. You'll start by explaining the deposition mechanics and strategy to the witness. Next, you'll go through the witness's recollections of the events of the case. Then, you'll go through documents that you've set aside that are likely to come up at the deposition. And finally, you plan to conduct a mock question and answer session.

The senior associate on the case wants to meet with you tomorrow to discuss the prep you'll be conducting for this witness.

### *Instructions*

Come prepared to discuss the following with the senior associate:

- When reviewing the documents with the witness, what will you focus on and what kinds of questions will you ask? And
- What are the steps you'll go through to conduct the mock Q&A with the witness?