

## EXERCISE

# TAKING A CORPORATE DEPOSITION

### *Background*

You're in the middle of taking the deposition of a corporate witness. The corporate witness claimed to be prepared to answer questions for each of the noticed topics, but you're concerned that she wasn't prepared well enough. She couldn't point to any specific meetings or document review that she had done to prepare when you asked about her preparation for each topic at the beginning of the deposition.

When you start questioning her about several important points, she claims to lack any knowledge, responding simply "I don't know" to your questions. You need to think fast and decide how to handle this situation.

### *Instructions*

Come prepared to discuss how you'll handle the witness's lack of knowledge at the deposition.