

## RULES FOR GIVING YOUR DEPOSITION

1. Always TELL THE TRUTH.
2. Don't get angry.
3. Treat opposing attorney with respect.
4. Don't volunteer information. Answer as briefly as you can and only what is asked.
5. Never interrupt the question. Take your time.
6. Listen carefully. Pause, then answer.
7. Don't guess. If you don't know the answer, say so. If you don't understand the question, say so.
8. Watch out for compound question (two or more questions in one). Make the attorney break it down.
9. Watch out for questions that assume false facts. Point out the false facts.
10. Watch out for questions that give a summary of the facts. Never let the other lawyer put false words in your mouth.
11. Don't characterize your testimony. Don't say "honestly", "truthfully", etc.
12. Avoid using absolutes like "always", or "never".
13. Watch out for "tell me all" questions. Don't get boxed in. Leave the door open so you can add things you may possibly remember later.

For example: "I'm sure I might remember other things if I were not so nervous...", or "...if I could review the records."

14. Dress neatly and conservatively.
15. Remember that your deposition is not a friendly chat. It is an important legal examination that can make or break your case.