## Do's, Don'ts, and Deps: Tips and Tools for Prepping Your Witness for Deposition

January 31, 2017

By Pamela R. Kaplan

The Whisper, DRI Young Lawyers Committee Newsletter, January 31, 2017.

While the Benjamin Franklin quotation "if you fail to plan, you plan to fail" may not always be true, in the context of deposition preparation, it could not be more on target. You've just been assigned to defend your first solo deposition, and now you begin thinking about how best to prepare your witness. As you sit down with the file and start writing notes, what should you focus on? What are some of the common pitfalls? What should you do? What should you avoid doing at all costs? Below are five tips for preparing your witnesses and ensuring that their depositions go as smoothly as possible.

To read the full article, please click here.

