

## **Questions for Video Depositions/Hearings**

1. Please state the full address of the place you are at right now.
2. Have you ever been there before?
3. Please describe the room you are in.
4. How many doors & windows?
5. Did anyone come with you today?
6. Is there anyone in the room, but off-camera.
7. What are their names?
8. Is there anyone just outside the room?
9. Is there anyone else listening as far as you know?
10. Have you discussed with anyone sending messages such as text messages during the deposition?
11. Did you bring anything with you?
12. How many monitors or screens are you looking at?
13. Do you have your chat window open and have you used it to communicate?
14. Will you tell me if you think someone is trying to communicate with you?

At the end of the deposition:

15. Have you texted, emailed, or engaged in any other form of electronic communication with anyone during the deposition?
16. Has anyone entered the room during the deposition?
17. Has anyone communicated with you from outside the room during the deposition?

Questions are adapted to the video setting from JIM GARRITY, 10,000 DEPOSITIONS LATER: THE PREMIER LITIGATION GUIDE FOR SUPERIOR DEPOSITION PRACTICE (3d ed. 2019)