

- I. Intro
 - a. My name
 - b. Ever taken a depo before-explain court reporter
 - c. Agreements:
 - i. We don't talk over each other
 - ii. If you don't understand a question let me know so I can rephrase it
- II. Background-here to discuss the accident on July 7, 2003 but we need some background first.
 - a. Full name
 - b. Date of birth
 - c. Address
 - d. Where did you live before that
 - i. Citizenship-place of birth
 - e. Social security number
 - f. Where did you go to school/how much education
 - g. Married
 - i. Name
 - ii. How long married
 - iii. Her citizenship
 - h. Children
 - i. How many
 - ii. Names
 - iii. Ages
 - i. Occupation
 - i. How long have you worked there
 - ii. What is the address
 - iii. How many hours a week do you work
 - iv. What is your schedule
- III. Day of—July 7, 2003
 - a. What day of the week was that?

- b. Did you work that day?
- c. Day before?
- d. Where and when did the accident occur?
- e. Where were you coming from?
- f. Where were you going?
- g. Who was in the car with you?
- h. Where were they sitting?

IV. Time of the accident

- a. What time of day was it?
- b. Draw a picture of the intersection
- c. Describe what happened?
- d. When you pulled up to the intersection did you stop?
- e. When you stopped what was (backseat) doing?
- f. When you pulled out to cross the street what was passenger doing?
- g. When you stopped could you see Plaintiff?
- h. Why did you stop?
- i. Could you have kept going?
- j. Why did you pull out if you were going to have to stop?
- k. Did you get out and help? What did you do?
- l. Did you talk to them? What did you say? What did they say?
- m. Were they injured?
- n. Did anyone else talk to them?
- o. What did their car look like? Describe it in detail.

V. Did the police come?

- a. What did you tell them?
- b. Did you hear what Plaintiff's told them?
- c. Did you get a ticket?
- d. What for?

VI. Last thing-if you had not started crossing the road this accident wouldn't have happened would it?