



CHECKLIST FOR PREPARING FOR AND EXECUTING A VIRTUAL DEPOSITION

1) Technology

- Choose platform (ensure that this is secure)
- Check bandwidth of deponent
- Order Real-time

2) Protective Orders/Stipulation

- Witness signed protective order?
- Stipulation as to:
 - i. Date
 - ii. Time (also length)
 - iii. Platform
 - iv. Counsel/Participant designation
 - v. Technology Check schedule
 - vi. Exhibit exchange
 - 1. Method of delivery (FedEx/Email) - Physical or Virtual
 - 2. Timing (# days in advance)
 - 3. Witness ability to review prior to deposition

3) Deposition

- Swearing In – make a record waiving all parties objections
- Start delayed until all designated counsel present
- Verify technology in room (no iPhone/watch/other program running on laptop)
- Verify other people in room (if relevant)
- Verify audio working properly
- Verify video clarity
- Verify exhibits received (with counsel, on record)
- If you lose connection, get agreement for delay and handling (Does not count toward time limit on length of deposition)
- Verification and reading/signing

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