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E-DISCOVERY SERVICES & STRATEGY



Remote Deposition Preparation Plan

- ☐ In an abundance of caution, obtain a stipulation from all parties to conduct the deposition remotely.
- ☐ In jurisdictions that do not allow for a court reporter or other notary to administer remote oaths, obtain an all-party stipulation to a remote swearing-in of the witness.
- ☐ Obtain an agreement from all parties on the date and time of the remote deposition and the location of the witness as well as all other agreed-upon attendees.
- ☐ Choose a vendor to host the remote video deposition.
- ☐ Schedule the remote deposition through the selected vendor, making sure to provide the contact information for each agreed-upon attendee.
- ☐ Confirm that you and the deponent (assuming he or she is your client) have the necessary equipment and suitable internet bandwidth to take part in the remote deposition.
- ☐ If applicable, work with your attorneys and their preferred providers to ship rental equipment to the appropriate people and places.
- ☐ Practice with and rehearse the deposition using the available sand-boxes administered by your attorneys or vendors.
- ☐ Test the selected remote video technology prior to the day of the deposition.
- ☐ Establish ground rules, through an agreement between the parties, that address how and when complete copies of the deposition exhibits will be distributed to the deponent and the other agreed-upon attendees.
- ☐ Consider including in your outline questions to be asked of the deponent that relate specifically to the remote environment in which the deposition is taken.