

DEPOSITION QUESTIONS

RE: _____

Date of Loss: _____

RULES:

- _____ Oath
- _____ One at a time
- _____ Verbal Responses
- _____ Uh-huh
- _____ Assume you understand
- _____ Guessing
- _____ Best Estimate
- _____ Take Breaks
- _____ Current State
- _____ Depo B4

BACKGROUND:

- _____ Names
- _____ Addresses (10 years)
- _____ Date of birth
- _____ Social Security No.
- _____ Driver license number, State, Restrictions, Record
- _____ Spouse
- _____ Children
- _____ Education
- _____ Military
- _____ Felony Convictions

EMPLOYMENT: (FOR EACH EMPLOYER)

- _____ Name
- _____ Address
- _____ Position
- _____ Supervisor
- _____ Performance Evaluations
- _____ Oral/Written notice for poor working, absences
- _____ Physical Exams
- _____ Job Applications since date of loss

VEHICLE INFORMATION:

- _____ Seatbelts
- _____ Ownership
- _____ Titled
- _____ Auto/Stick
- _____ Familiarity w/ vehicle
- _____ Passengers
- _____ Working at the time
- _____ Cell phone, # and carrier
- _____ Radio on/off
- _____ Windows up/down

Date of Loss: _____

PLACE OF ACCIDENT (Describe):

_____ Neighborhood
_____ Lanes/Marked/Width
_____ Intersection
_____ Weather
_____ Visibility
_____ Surface
_____ Lighting
_____ Familiar with Area
_____ Traffic Control Devices
_____ Speed Limit

LOCATION OF VEHICLE:

_____ First sight (distance/speed/Time)
_____ Point of Contact B/N Vehicles
_____ Point of Contact in Road
_____ Vehicle Move Upon Impact
_____ Damage to Vehicle(s)
 Plaintiff
 Defendant
_____ Warnings
_____ Skid Marks
_____ Debris
_____ Point of Rest

IMPACT:

_____ Describe
_____ Vehicle move, how far
_____ Items shift/type
_____ Body parts hit inside
_____ Body move
_____ Injured?
_____ Receive medical treatment

OTHER VEHICLES ARRIVE:

_____ Police Office
_____ Ambulance
_____ Friends of Family come to scene
_____ Witnesses

Date of Loss: _____

CONVERSATIONS:

_____ Police Officer

_____ Report

_____ History

_____ Citations

_____ Witnesses

_____ Other Drivers

_____ Given any recorded statements, when, who, represented by counsel?

_____ Written Statements