

Preparing Plaintiffs for Personal Injury Depositions in Houston

Injuries take a heavy toll on a person, both physically and emotionally and not all of the damage can be quantified. When you are preparing a plaintiff for personal injury <u>depositions</u> in Houston, it is important to make sure you have all of your information ready and prepare your claimant for the deposition. There are certain guidelines you should follow to ensure that your plaintiff knows what to expect when they are called to testify about their experience.

Make Sure Your Plaintiff's Story Makes Sense:

First of all, you'll want to verify the circumstances of the accident. If the plaintiff fell, was injured in a car accident or at work, you'll want to make sure that they have their story straight. The opposing counsel will ask very specific questions about the circumstances that will be intended to confuse the claimant and make their assertions seem unlikely or inconsistent. Which way they were facing, which direction they remember hearing a noise from, how they were hurt and which way they fell will all be covered in detail. You'll want to question your plaintiff on these things before **depositions** take place and make sure their story is sound.

Get Verification of Medical Treatment:

You'll want to verify the injuries sustained by the plaintiff, the extent of them and the extent to which they sought to remedy them. The more proof you have on your side the better, so before you go into any *depositions*, you'll want to gather any evidence of the injury. Did they immediately notify Workman's Compensation or their insurance company? Depending on the severity and type of injury the plaintiff sustained, they may have gone to the doctor or the hospital. Gather records of those visits, of the prognosis, of recommended treatments, follow-up visits and referrals, and any medicines or medical equipment that the plaintiff purchased towards recovery. Any receipts, letters from insurance companies, bills, credit card statements, etc. that show the plaintiff's treatment will act as a confirmation of the fact that they were hurting and seeking help.

Prepare the Plaintiff for Depositions:

Once you have your information ready, you'll want to prepare your plaintiffs for the actual *depositions*. Make sure that the plaintiff is dressed appropriately and aware of the rules. This does not just mean when to stand and when to sit, but what to answer, who will be there, and who to address. Since there are going to be <u>court reporting</u> professionals or legal videographers there to record the event, make sure the claimant knows why they are there. Most importantly, make sure that your plaintiff knows that *depositions* are not the place for elaboration. The best answers are short and to the point. The plaintiff should not volunteer anything. The goal should be to provide clear answers that do not lead to further questions, so that the claimant cannot become confused and reveal things that might damage their case. Also, if confused by a question, plaintiffs should always seek clarification before answering.

When preparing plaintiffs for *depositions*, make sure that they have their story straight. By having a consistent story, documentation and by knowing what to expect in *depositions*, you can ensure that your claimant has the best chance of getting a good settlement.

888.893.3767 WWW.DEPOTEXAS.COM