

Deposition Guide | Morris Bart, LLC

BACKGROUND INFORMATION

- Name, address, and date of birth
- A list of residences over the last 10 years

Familial details:

- Are you married/divorced/separated?
- Do you have any children and what are their ages?
- Is there any extended family living with you?

Educational details:

- Where and which high school did you attend?
- Where and which college did you attend and what did you study?
- Any special vocational or technical education?

Work details:

- Where was your place of employment at the time of the accident?
- What were your duties?
- What was your income?
- Did your job require any special training?
- Did your job require physical labor?
- Where did you work before your most recent job?

ACCIDENT INFORMATION

- Time and date of the accident
- Where were you traveling to and from just before the accident?
- Did you have any passengers?

Location of the accident:

- Physical address
- Description of the road or road quality
- Description of any road signage in the area (stop signs, traffic lights, street or highway signs, etc.)

Describe the environment in the car prior to the accident:

- Describe any pertinent weather affecting the accident
- What were you doing in the vehicle prior to the accident?
- Were you using your phone?
- Had you been drinking?

- Had you used any drugs or taken any medication?
- Were there children in the car?
- Was the radio on?

Describe the accident itself:

- What did the other vehicle do?
- What did you do?
- Did you see them coming?
- What was the traffic like?
- Could you avoid the accident? If not, why?
- How is the accident the other driver's fault or could it be yours?
- Where did the cars collide?
- Where on your car was the point of impact?
- Where did your respective cars end up after impact?

Describe any police interaction post-accident:

- What information did you give the police?
- Was a police report filed?
- Did you speak to the other driver, and if so, what did you say?

INJURY AND TREATMENT INFORMATION

Describe your injuries:

- What were they?
- Had you experienced similar injuries before the accident?

Describe the treatment you received:

- Where did you go for treatment?
- What kind of treatment did you receive?
- What doctors have you seen since the accident?
- What was the diagnosis?
- Are you still being treated, or have you fully recovered?
- How do your injuries affect your daily life? Are there things you can't do anymore?

Describe your work situation post-accident:

- Can you perform the same job as before the accident?
- Can you earn as much money as before the accident?