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From Amanda Francis:

Hey ladies,

I am so pumped that I took Theresa and Courtney's advice to do my defendant depo like a cross exam today. This was my first time doing this and I just thought I would share how it went.

I cut my normal depo outline down to a page and a half:

VIDEOGRAPHER reminder- Only view defendant - no documents on screen.

Will you let me know if you don't understand a question?

Any reason you can't testify fully and honestly today?

Before we get started, I want to remind everyone of discovery protocol regarding deposition conduct that Judge helpfully entered on pages 10-11 of his pretrial order so we are all on the same page moving forward - Mark this as exhibit 1 and enter in case we need to reference.

Did you review any documents related to this lawsuit? No.

Restate and summarize. Photos? TAR ? MR? Settlement demands? No.

You agree that you're 100 percent responsible for causing the crash on September 28, 2018? Yes.

You agree this crash was severe? No, it was moderate.

What is that based on? I don't know.

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Let's take a look at what the responding police officer said. Show report description as severe.

Your vehicle was destroyed from the impact correct? Yes.

Your airbags went off? Yes

The other driver's airbags went off? Yes

Your car was undriveable? It was towed due to damage? Yes

Same with the other car? Yes

On a scale of 1-10, 1 being minor to 10 being severe, where would you rank this? 8.

Do you agree this was severe based on this evidence? YES

Are you aware that P was on his way back to the hospital to pick up his wife and newborn? Yes

Do you have any reason to believe he is faking or exaggerating his injuries? NO

GOAL - Do believe Mr. Hines was injured in this crash? I don't know.

What's that based on? Facts? witnesses? Documents? None.

Your lawyer has submitted an answer on your behalf stating that you deny that Mr. Hines was injured in this crash. Do you deny that he was injured? Yes.

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What information is that based on? Facts, Witnesses, Documents?

What information is that based on? No evidence, just convos with my attorney.

Do you agree that he could have been injured in this crash? Yes.

In your answers to discovery, you deny that as a result of this incident, Danny Hines incurred physical impairment. Do you deny he has physical impairment? I don't know.

What information is that based on? Facts, witnesses documents. He could have been hurt from something else.

Are you aware of any evidence that he was hurt before the crash? No.

Are you aware of any evidence that he was hurt after the crash? No.

What else could it be? Help me understand. Maybe he fractured his vertebrae lifting his new born baby.

What do you think is more likely, that he fractured his vertebrae in this 8-10 crash or that he fractured it lifting his new born baby? Probably the crash but anything is possible.

Outline our attempts at settling.

This is the final opportunity to settle.

THE END.