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ECONOMIC & EFFECTIVE DISCOVERY AND TRIAL TIPS

- I) The Adverse Expert
 - A) Discovery Tools
 - 1) Records Deposition in advance of any Discovery Deposition
 - (a) Pros and Cons
 - 2) Prior Depositions/Prior Lawsuits
 - 3) Review Publications
 - 4) Basis for Request for Admissions
 - B) Effective Cross Examination
 - 1) Bias
 - 2) Competence of Treating Doctor
 - 3) Lack of Competence of Adverse Doctor
 - 4) Use of Financials
- II) Other Witnesses/Other Discovery
 - A) Reading a deposition to the Jury
 - B) Talk to witnesses on your own
 - C) Establish that a witness is not the client
 - D) The IME
 - 1) Location
 - 2) Terms
 - E) Order of discovery
 - F) The Plaintiff's De Bene Esse Video
 - 1) Length
 - 2) Substance
 - 3) Exhibits
- III) Trial
 - A) Order of Trial
 - B) Effective Cross Examination