

“TEN TIPS FOR GREAT VIDEO DEPOSITIONS”

1. **A VIDEOGRAPHER NEEDS ONE FULL HOUR BEFORE THE START OF THE VIDEO DEPOSITION TO SET UP THE EQUIPMENT PRECISELY AND SAFELY. THERE IS A CAMERA RECORDING THE EVENT AND A BACK UP CAMERA FOR ANY EMERGENCY. TWO OR POSSIBLY THREE FEEDS ARE BEING RECORDED SIMULTANEOUSLY. THERE ARE NUMEROUS LAVALIERE MIKES AND A TABLE MIKE THAT NEED TO BE PLACED PROPERLY. SPECIAL LIGHTING AND A SOUND MIXER ARE UTILIZED AS WELL.**

2. **ACCORDING TO CODE SEC. 2025.340 “(a) The area used for recording the deponent’s oral testimony shall be suitably large, adequately lighted, and reasonably quiet.”**

(A) ALLOW ENOUGH ROOM FOR THE VIDEO EQUIPMENT AND THE VIDEOGRAPHER, IN ADDITION TO A MINIMUM OF TWO ATTORNEYS, ONE COURT REPORTER AND THE WITNESS OR WITNESSES.

(B) IF CONDITIONS ARE TOO CROWDED, THE WITNESS MIGHT BECOME DISTRACTED. FOR SAFETY REASONS THE EQUIPMENT SHOULD NOT RESTRICT NORMAL MOVEMENT.

**If you don’t have a conference room meeting most of these criteria --
We do! Please call us for the video deposition scheduling at:**

3. **“LIVE MIKES’ ARE ALL AROUND YOU IN A VIDEO DEPOSITION SETUP. IT IS BEST TO NEVER MAKE ANY CASUAL, OFF HAND REMARKS AND ABSOLUTELY NOTHING THAT IS PERSONAL OR PERTINENT TO THE CASE. IT IS ESPECIALLY IMPORTANT NOT TO BE OVERHEARD IN AN OBVIOUS ATTORNEY/CLIENT EXCHANGE.**

4. **THERE IS NEVER A GOOD REASON TO CHARGE EXPEDITED RATES FOR VIDEO DELIVERY. IF NECESSARY, YOU SHOULD BE ABLE TO LEAVE WITH YOUR COPY OF THE VIDEO DVD IN HAND WHEN THE DEPOSITION IS CONCLUDED.**

5. **DID YOU KNOW WHEN NOTICING A VIDEO DEPOSITION, THE CODE OF CIVIL PROCEDURE, SEC. 2025.330, MANDATES THE USE OF CERTAIN LANGUAGE?**

IN THE ABSENCE OF USING THE MANDATED LANGUAGE, YOUR VIDEO DEPOSITION MAY BE NULL AND VOID UPON ANY CHALLENGE TO THE COURT.

6. **MPEG1's ARE REQUIRED TO CREATE VIDEO/TEXT SYNCHRONIZATION. IF POSSIBLE, IT IS AN EXCELLENT COST- SAVING TOOL TO HAVE YOUR VIDEO PROVIDER SEND AN ACCOMPANYING MPEG1 WITH YOUR VIDEO DVD AT NO ADDITIONAL CHARGE.**

VIDEO/TEXT SYNCHRONIZATION DISPLAYS THE VIDEO PLAYBACK ALONGSIDE THE TEXT FOR EASY SEARCH AND RETRIEVAL. IT IS AN EXCELLENT RESEARCH TOOL.

7. **A VIDEO DEPOSITION IS THE RIGHT ENVIRONMENT FOR EVERYTHING TO GO RIGHT OR EVERYTHING TO GO WRONG!**

AVOID BASEBALL CAPS, SUNGLASSES, LOW CUT BLOUSES, SHORT SHORTS, CUT-OFFS, SANDALS – YOU GET THE PICTURE.

PLEASE HAVE THE WITNESSES ESPECIALLY AVOID ANY EXOTIC ATTIRE.

BAWDY BEHAVIOR: REMEMBER YOUR WITNESS IS ON CAMERA. THE CAMERA RECORDS EVERYTHING AND NEVER FORGETS.

IF EVERYTHING GOES RIGHT, YOU END UP WITH A PERMANENT VISUAL VIDEO RECORD THAT CAN ENHANCE YOUR CASE.

8. **MOCK VIDEO DEPOSITIONS ARE PROBABLY ONE OF THE SUREST METHODS OF INSTILLING IN AN OTHERWISE ERRANT WITNESS AN UNDERSTANDING OF HOW POOR BEHAVIOR COMES ACROSS IN A VIDEO. IT IS AN INSTRUCTIONAL AND OFTEN SOBERING TECHNIQUE.**

**We offer Mock Video Depositions at half price for your convenience.
Your office location or ours.**

- 9. THE WITNESS SHOULD BE FRAMED IN THE VIDEO PICTURE FACING THE CAMERA, SHOULDERS AND HEAD IN THE FRAME.**

TRY TO AVOID A WITNESS BEING FILMED IN PROFILE, WHEN A DIFFERENT ATTORNEY IS QUESTIONING THE WITNESS, BY SIMPLY EXCHANGING SEATS.

USE A BACKDROP TO AVOID ANY DISTRACTING OBJECTS FROM THE BACKGROUND.

- 10. EXTRANEOUS NOISES SURROUNDING THE VIDEO DEPOSITION MAY MAKE THE VIDEO UNWATCHABLE. NOISES FROM WINDY CONDITIONS, EVEN AN INSIDE AIR-CONDITIONER, HAMMERING OR CONSTRUCTION NOISE, OR TELEPHONES, BEEPERS, PAGING SYSTEMS, etc., SHOULD BE CONTAINED OR COMPLETELY AVOIDED. LOUD PEOPLE OUTSIDE THE CONFERENCE ROOM SHOULD BE ASKED TO ASSEMBLE ELSEWHERE.**