

# POST-DEPOSITION ANALYSIS CHECKLIST

Depositions generate valuable information that often gets buried in lengthy transcripts. This checklist provides specific prompts for use with Transcript Genius to systematically extract actionable insights from deposition testimony.

## GET THE BASICS ORGANIZED

1. **Create a Topical Index:** Organize testimony by subject matter with page/line citations for each topic.
2. **Build a Timeline of Events:** Extract all dates and chronological information to create a comprehensive timeline.
3. **Damages Evidence:** Extract all testimony related to damages from these transcripts.

## EXTRACT ADMISSION AND CONTRADICTIONS

1. **List All Admissions:** Identify every admission made in this deposition.
2. **Identify Contradictions:** Compare all witness testimony and identify any contradictions.
3. **Map Areas of No Knowledge:** List topics where the witness claimed lack of knowledge or memory.

## PLAN YOUR NEXT DISCOVERY MOVES

1. **Missing Witness Identification:** List witnesses mentioned but not yet deposed. Prioritize by potential impact.
2. **Document Discovery Gaps:** Identify referenced documents not yet obtained. Create prioritized request list.

## REVIEW YOUR DEPOSITION PERFORMANCE

1. **Missed Opportunities Audit:** What additional questions should have been asked?
2. **Question Technique Analysis:** Identify missed follow-up opportunities.

## CROSS-CHECK ALLEGATIONS

Add the complaint to Transcript Genius for additional analysis

1. Compare expert opinions with the factual allegations in the complaint - where do they align or diverge?
2. Which allegations in the complaint have been most damaged by deposition testimony?
3. Create a chart showing: [Complaint Allegation] | [Supporting Testimony] | [Contradicting Testimony] | [Gaps in Evidence].
4. For each cause of action in the complaint, create a checklist of elements and mark which ones have testimonial support.
5. What facts from the depositions could support amending the complaint?