

Information or instructions: Letter to a Client Regarding Reviewing a Deposition

PREVIEW

1. Use this letter to inform the client that his or her deposition has been transcribed and notify the client to meet with the attorney so that they can review the deposition.
2. Inform the client of the importance of checking the deposition for accuracy, since the deposition can be used to impeach the client at trial.

Information or instructions: Letter to a Client Regarding Reviewing a Deposition

[Date]

[Client's name]
[Client's address]

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ATTORNEY-CLIENT COMMUNICATION: THIS DOCUMENT AND ITS CONTENTS CONSTITUTE LEGALLY PRIVILEGED INFORMATION

Regarding: Review of Your Deposition

Dear [Client's salutation]:

I have recently received your deposition which was taken on _____

I suggest that we meet on [date, time & place] so that we can review your testimony and make any needed corrections. If any, please call me so we can set up a meeting.

THIS DOCUMENT

It is important for you to read your deposition very carefully. If you do not read and correct your deposition, it will stand as written and you will lose your most opportune time to correct it. It is important to make any changes now rather than wait until the time of trial and try to contend that the deposition was not transcribed correctly. The Judge or jury may not believe your position if you wait until trial to make the changes. You should indicate on the Corrections and Signature Page any changes that you believe should be made and on what page and line the corrections should be made. I will discuss the changes with you.

The opposing attorney will use your deposition at trial and try to impeach your credibility with ANY inconsistencies. Consequently your deposition testimony should be completely true and correct.

THANK YOU

Since time is of the essence, please do this immediately. If you have any questions or comments, please feel free to contact me.

Very truly yours,

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[Attorney's name]

Certified Return Receipt Request Number

PREVIEW

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THANK YOU

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