Tabzoola

Deposition Binder Checklist

One binder per witness, built so the outline and the documents sit side by side.

Case / client: _____ Date: _____

- [ ] Notice of deposition and any subpoena
- [ ] Witness background: role, employment history, prior testimony
- [ ] Deposition outline, topic by topic
- [ ] Key documents the witness wrote, received or signed
- [ ] Prior statements, declarations and interrogatory answers
- [ ] Prior deposition transcripts of this witness
- [ ] Testimony of other witnesses to confirm or contradict
- [ ] Exhibits to mark, pre-numbered and in the order you will use them
- [ ] Clean copies of each exhibit for the court reporter and opposing counsel
- [ ] Privilege log and documents withheld
- [ ] Stipulations and agreements on the record
- [ ] Notes page for follow-up requests and open items

TAB IT: Tabzoola's 8-tab set for this binder

Notice · Background · Outline · Key Documents · Prior Testimony · Other Witnesses · Exhibits to Mark · Follow-Up

Printed on the tabs, collated and 3-hole punched with clear Mylar on every tab: 25 sets are $204.30 ($8.17 a set), every section renamed to yours at no extra cost, with a free PDF proof before anything prints.

tabzoola.com/tabs/deposition-binder-tabs · (847) 397-1200 · made in Schaumburg, Illinois since 1993

An organizing aid, not legal or financial advice. Follow your court's rules and your firm's procedures.