Depositions: Tricky Issues and How to Handle Them
Sponsor: Laborde Earles • **Speaker:** Mary K. Cryar
Format: In-person only (no remote/virtual)
Date & Time: Thursday, April 9, 2026 • **2:00–3:20 p.m.**
Location: Laborde Earles, 1901 Kaliste Saloom Road, Lafayette, LA 70508
Tuition: $500.00
MCLE Credit: 1.0 hour (General) — *pending LSBA approval*

Description
Depositions often present challenges that go beyond basic questioning techniques. This CLE will provide practical strategies for navigating complex deposition situations, including effectively using documents, establishing evidentiary foundations, and managing difficult witnesses and opposing counsel. Attendees will learn how to create a clear record, handle common objections, and maintain control of the deposition when confronted with evasive testimony or obstructionist tactics. This program is designed to give litigators practical tools they can immediately apply in their next deposition.

You will learn to:

- Practical methods for **using documents effectively in depositions**, including generating questions and forcing key admissions
- How to **lay proper evidentiary foundation for exhibits**, including contracts, emails, photographs, and social media
- Techniques for **preparing documents before the deposition** to maximize effectiveness and efficiency
- Strategies for **handling difficult witness types** such as evasive, forgetful, vague, or combative witnesses
- How to use **tone, silence, and questioning style** to maintain control of testimony
- Best practices for responding to **speaking objections and improper instructions not to answer**
- How to identify and respond to **obnoxious or obstructionist opposing counsel**
- Steps to **create a strong record during problematic depositions**
- When and how to **seek judicial intervention or file a motion to compel answers**

Registration / Contact
Contact **Kelby Rasmussen** at **kelby@onmyside.com** to register or for details.