* Swear in the witness
* do you agree to the usual stipulations?
	+ Objections, except those as to form, reserved for trial (NOTE: Can object to privileged info as well)
		- Compound
		- Ambiguous
		- Calls for speculation
		- Misstates testimony
	+ Motions to strike reserved for trial
	+ Objection for one, objection for all
	+ Waive arguments as to defects in depo notice
* Ask if party wants to read and sign transcript?
* Instructions
	+ Answer audibly
	+ Wait for me to finish question before answering
	+ If you don’t understand a question/confusing, let me know
	+ If you need a break, let me know

Testimony Framework

* Review depo notice and go over missing items
* Background
	+ Age
	+ Upbringing
	+ Family
	+ Education
* Marriage
	+ When parties met/how long did they date?
	+ Married before?
	+ When did they get married?
	+ How would you describe your marriage? Happy? Contentious?
	+ Did the two of you plan to have children?
	+ Tell me about your children.
	+ Describe your respective roles in raising children
	+ Describe relationship each of you have with the children
* Work history of both parties
	+ Places where you have worked
	+ Last job
		- Position
		- Income at your last job?
		- Reasons surrounding your leaving
	+ Career plans/current job
		- Current plans for seeking new employment
* Health
	+ How is your health?
	+ Do you suffer from any medical ailments?
	+ What medications do you take?
	+ What doctors are you seeing now?
	+ Does your health impact your ability to work?
	+ Potential health ailments?
	+ Anticipated medical costs?
* Marital problems
	+ When did they begin
	+ What were the problems
	+ Any infidelity?
	+ Any dishonesty?
	+ Any inappropriate spending?
	+ What did she do to contribute to breakdown of marriage
	+ What did spouse do to contribute to breakdown of marriage
	+ How would you allocate blame?
* Current Financial situation
	+ Income
		- Including history
	+ Expenses
	+ Assets
		- Including history
	+ Debts
		- Include history
	+ Any inheritance received either party?
	+ Any premarital funds for either party?