* 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?