



How to Use AI for Depositions:

From Preparation to Verdict

Presented by Karl Seelbach & Brett Mason



Who is Karl Seelbach?



**STEPHEN F. AUSTIN
STATE UNIVERSITY**
THE UNIVERSITY OF TEXAS SYSTEM
NACOGDOCHES, TEXAS



**South Texas
COLLEGE OF LAW**
— HOUSTON —



Who is Brett Mason?



EMORY
UNIVERSITY



PODCASTS

The Good Bot: Artificial Intelligence, Health Care, and the Law





DISCLAIMERS

We are not your attorneys.

This presentation is not legal advice.

We are not responsible for naps during PowerPoints.

Any typos are AI's fault, not ours.

Billable time spent reading this disclaimer: 0.1.

If you cite this presentation in a brief, we will object.

DISCLAIMERS (cont.):



Data Privacy

You need to study this yourself and make sure you are comfortable with how your AI tools handle sensitive and privileged information.



Firm Policies

Make sure your firm has a policy on generative AI and that you are following it. If one doesn't exist, advocate for creating one.



Client Policies

Consider whether your clients have their own AI usage policies — or may actually prefer you to use AI to create efficiencies, cost savings, and to help equip you to build your best possible case.

Want Sample AI Policies?

I'm happy to share templates — just reach out!



Engagement Letter Policies

AI disclosure language for client engagements.



Internal Law Firm Policies

Approved tools, recommended best practices, and oversight.

karl@skribe.ai



Preparing for Depositions *with AI*



Depositions: *Prep*



Study Materials

Google NotebookLM



AI-Powered Research — Grounded in Your Documents

Upload your case files and get AI work product grounded only in your documents.

WHAT IT GENERATES

- Deposition Prep Outlines
- Audio Summaries
- Study Guides, Timelines & More

Why This Matters

Grounded

Cites only your uploaded sources

Secure

Files stay private, not used to train models

Free or Plus (\$14-\$25/mo.)

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Transcript of Australia House Damage Assessment and Cleanup

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Alex: I love it. **Contradiction 2: The May 2016 "Battered Face".** **The Setup:** "You claim Johnny threw a phone at your face on May 21, leaving a visible bruise, correct?" 20. **The Trap:** We use Isaac Baruch and Laura Divenere. Baruch testified he saw her in the hallway on May 22, 23, and 24, in good fighting, with absolutely no makeup and no marks, cuts, or bruises 13. 20. Laura Divenere, who worked for her, testified she saw Amber up close on May 23, 24, and 25, and also saw zero signs of injury, redness, or swelling 21. **The Confrontation:** "Ms. Heard, Isaac Baruch stood inches from your face on May 22nd and saw no bruises 20. Laura Divenere rode in elevators with you on May 23rd and 24th and saw no injuries 21. Are your own friends and employees lying under oath to protect Johnny? Or did you fake the injury for the restraining order?"

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Alex: Brutal. So how do we sequence this? We have seven hours.

Sam: Sequencing: Building False Comfort (Morning) We lead with the dry, procedural stuff. Have her talk about her op-ed. We'll ask about her communications with her lawyer Eric George and the ACLU regarding the drafting 27. 28. She'll feel smart and in control. Next, we pivot to the timeline of the UK trial. We casually walk her through the 14 incidents to lock in her testimony. We ask about her makeup routine for the James Corden show with Melanie Inghelssis 27. 28. She'll comfortably repeat her script because she survived the UK cross-examination.

Alex: And then we drop the hammer. **Save for the End (Late Afternoon)** Sam: Exactly. By 3:00 PM, she'll be tired, defensive, and completely committed to her UK narrative. That's when we deploy the US discovery she hasn't faced yet. First, we hit her with the Jennifer Howell deposition about Whitney 29. She won't expect us to have her sister's former boss testifying that Whitney confessed Amber chopped the finger off. Then, we play the audio recordings back-to-back—the Jerry Judge tape 19 and the "I didn't punch you" tape 25. We corner her with the acoustic reality of her own voice being the aggressor. Finally, we close out by running through the neutral witnesses—Baruch 20, Divenere 21, and the police 12—who contradict her May 2016 injuries.

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*But what if you could
talk back?*

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NotebookLM Also Generates...

Beyond podcasts, here's what else it can build from your case files



Mind Maps

Visual case maps showing key players, events, and connections at a glance



Video Overviews

AI-narrated video summaries that walk through your case chronology



Infographics

Auto-generated visual breakdowns of damages, timelines, and relationships



Slide Decks

Draft presentation slides organized by topic from your uploaded documents

The September 2015 Altercation: Conflicting Accounts

A summary of claims and admissions regarding a physical conflict from a 2015 audio transcript.

THE BATHROOM DOOR INCIDENT



Conflicting Claims of Injury

Depp claimed the door hit his head; Heard claimed the door scraped her toes.



Dispute Over Intentionality

Heard characterized the door contact as an accident resulting from a mutual struggle.



Escalation of the Door Struggle

Depp alleged Heard "kicked" or "pushed" the door into him while he was bent down.



DIRECT PHYSICAL CONTACT



Allegation of a Punch to the Jaw

Depp accused Heard of "clocking" or punching him in the jaw after he stood up.



Admission of Physical Contact

Heard admitted to hitting Depp with her hand/fist but denied the technicality of "punching."



Retreat and Locked Doors

Depp described retreating to a bathroom/office and locking the door to end the fight.

Incident @ Family Dollar DC

The Incident (Sept 16, 2023)

Claimant

Witnesses & Employees

Family Dollar Services, LLC (DC)

Legal & Case Status

's Role

Equipment Details (Tugger #503)

Jan 2024 Ladder Incident

Damages & Value

Additional Info

Location

Equipment

Claimant's Actions

Witness Accounts

Immediate Aftermath

Evidentiary Transcript Review: Depp v. Heard

Forensic synthesis of recorded audio and deposition exhibits.

Case: Circuit Court of Fairfax County (CL-2019-0002911)
Subject: Analysis of September 2015 Audio and Related Exhibits

- 1 Evidentiary Transcript Review (Depp v. Heard)
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Your AI Co-Counsel for Deposition Preparation

Advanced AI reasoning to help you draft, analyze, and prepare.

HOW TO USE IT

- Deposition Outlines
- Witness Prep Questions
- Cross-Exam Strategy



Why This Matters

Reasoning

Thinks through complex legal arguments

Versatile

Outlines, witness prep, cross-exam in one tool

Affordable

claude.ai — Free, \$20/mo. Pro or \$100/mo. Max

Depositions: *Prep*

Outlines



Hey there, I'm Claude.

I'm your AI assistant for brainstorming, creating, and learning together.

Here's a few things you should know about me:



Curious? Just ask

Chat with me about anything from simple asks to complex ideas! I'm always ready to help (literally).



Your data is in your control

I don't train on your chats by default. You control your data and can delete chats or your account anytime.



I'm built to help, never harm

Automated safeguards protect our conversations from creating violent, abusive, or deceptive content.

I understand



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INSPECTION

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What can I help you with today?

I represent an employer in a personal injury lawsuit involving an alleged workplace injury. The opposing party has retained a safety expert to offer opinions supporting their claims. On behalf of the employer, we have retained a "Doctor Strange" as a rebuttal expert to address and challenge the other expert's opinions, particularly regarding workplace safety standards, training adequacy, and OSHA compliance.

Using the content of both expert reports—the Claimant's expert's affirmative report and Dr. Strange's rebuttal—**please draft a detailed deposition examination outline for deposing the Claimant's expert.**

The outline should be strategically organized to:

1. Undermine the credibility and foundation of Claimant's expert opinions;
2. Expose any methodological flaws or speculative assumptions;
3. Contrast his views with established OSHA standards or industry norms;
4. Leverage Dr. Strange's opinions and citations where applicable; and



Claude Sonnet 4 ▾





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DEPOSITION
P



Depositions: *Prep*

Outlines *Witness prep*

K

The Claimant is expected to cross-examine the forklift driver—my client's employee—at deposition. I need to prepare this driver thoroughly for his deposition.

Please draft a detailed deposition preparation guide for the forklift operator, organized by topic areas likely to be the focus of Claimant's cross-examination. The guide should:

1. Identify key areas of anticipated questioning (e.g., training received, prior incidents or complaints, visibility at time of incident, compliance with safety protocols, communication with the injured party, post-incident conduct, etc.);
2. Include sample questions Claimant's counsel may ask;
3. Provide suggested answer frameworks for each topic (e.g., "Keep answers short and factual," "Avoid speculation," "Clarify what you recall vs. don't recall");
4. Highlight common deposition pitfalls for witnesses in these cases (e.g., agreeing with loaded questions, overstating training gaps, volunteering unnecessary information); and
5. Incorporate practical reminders for demeanor, body language, and maintaining composure under pressure.

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Your AI Thought Partners

Three powerful tools to search, analyze, and prepare for depositions

Google NotebookLM

Upload case files and let AI generate podcasts, mind maps, summaries, and more — grounded in your documents.



Anthropic Claude

Advanced reasoning for deposition outlines, witness prep, cross-exam strategy, and legal analysis.



Microsoft Copilot

GenAI tool that also searches your emails (*Office 365 users) and firm database (opt-in required).

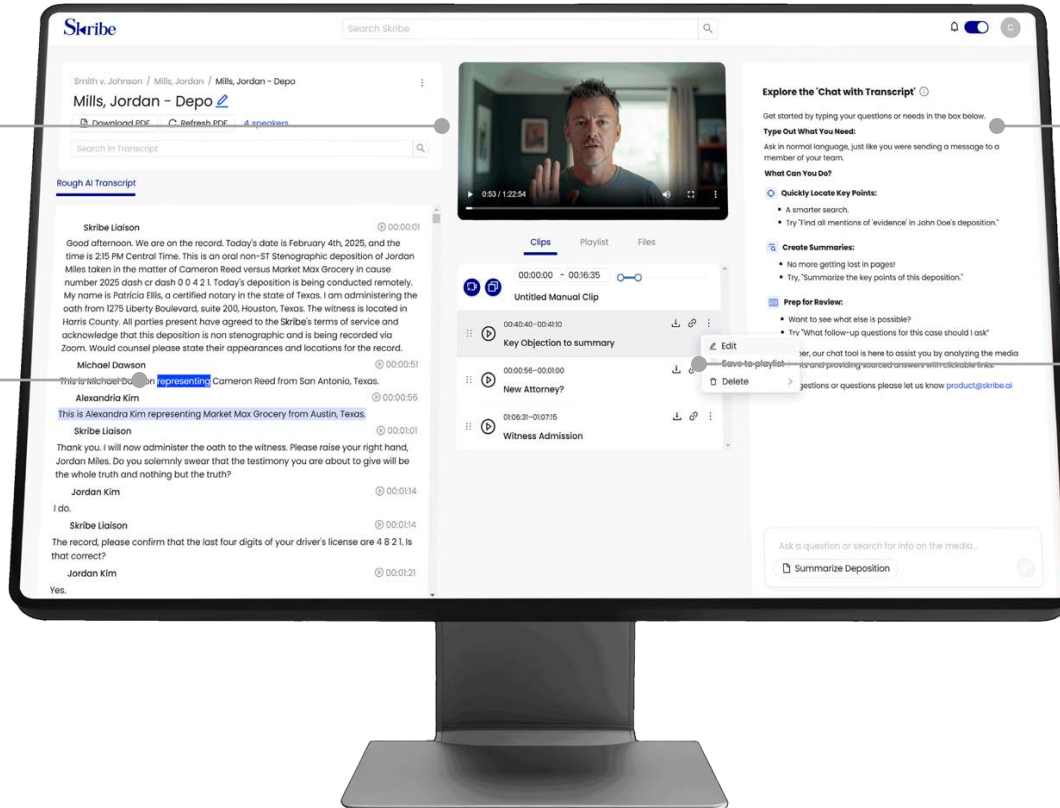


Deposition Intelligence Platform

Built for Litigators

Video
Synced
Transcript

Key Moment
Search



Chat &
Draft with AI

Easy Video Clip
Sharing

Preparing a 30(b)(6) Witness with Skribe



AI-powered deposition intelligence — ask questions, find contradictions, and prep your witness in minutes

WHAT YOU'RE ABOUT TO SEE

- 1 Review a synced video transcript in Skribe
- 2 Chat with AI to analyze testimony in seconds
- 3 Generate 30(b)(6) prep questions and topic areas

Sample AI Prompt

"Based on the plaintiff's deposition, identify topics counsel will probe in a 30(b)(6) deposition, key documents the rep should review, areas where plaintiff testimony creates traps, and suggested prep questions."



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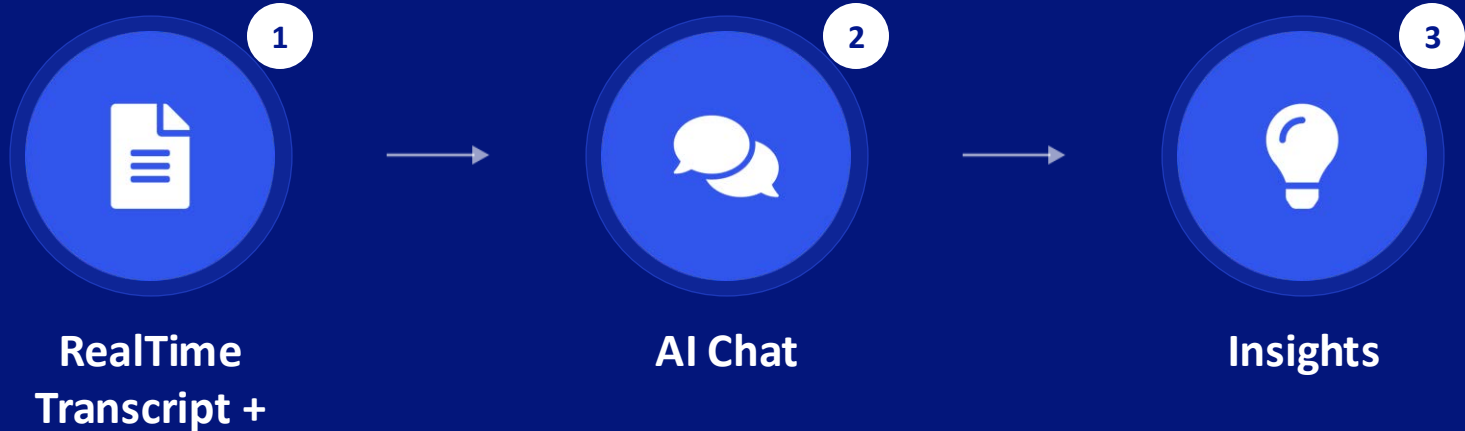
EXIT

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Taking Depositions *with AI*



What to Expect in a Scribe Deposition



Digital Reporter *(yes, a real human)*

Every deposition is managed by a certified notary, a trained digital reporter who handles the record from start to finish.



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You only pay for time on the record. Breaks, off-the-record discussions, and downtime are never billed.

LIVE DEPOSITION

10:02:14 Q: When did you first notice the damage?

10:02:31 A: It was sometime in March, I think the 12th or 13th.

10:02:45 Q: Did you report it to your insurance company at that time?

10:03:02 A: Yes, I called them the next day.

10:03:15 Q: And what happened when you called?

AI INSIGHTS

⚠️ Witness changed timeline from "March 12" to "12th or 13th" — uncertainty flagged

✅ Witness confirms immediate report to insurer — supports claims timeline

💡 Suggested follow-up: Ask for specific date and supporting documentation

Add to Calendar

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Trans

Files

+Add File



Realtime Transcript

Jun 23, 2025 2:45 PM



RealTime Examples

Jun 23, 2025 2:46 PM

call started



DEMO

Making Sure I Don't Miss Anything Important

Using Scribe's real-time transcription to catch gaps, evasive answers, and missed follow-ups in realtime

WHAT YOU'RE ABOUT TO SEE

- 1 Ask AI to analyze the live deposition transcript
- 2 Watch AI identify evasive answers in real time
- 3 Get follow-up questions to strengthen the defense



Sample AI Chat Prompt

"Based on the testimony so far:

- (1) what are some areas where the witness was evasive and suggest follow-up questions to try to pin them down, and*
- (2) are there any questions I failed to ask that I should ask to help bolster the defense."*

SHAMIKA VAUGHNS

📄 Download PDF 🔄 Refresh PDF 6 speakers- 16 +📄 Rough Transcript 📄 Final Transcript

- Notary** 00:00:02
We are on the record. Today's date is Tuesday, November 18th, 2025, and the time is 9:05 AM Central Standard Time. This is the deposition of Shamika vs. Taken under cause number, I'm sorry, American Arbitration Association, Shameika Vons Case versus Lowe's Home Centers LLC and Jose Rodriguez. Case number 01240053659. My name is Ashley J. Mason, a certified notary in the state of Texas with commission number 132457287. I'm administering the oath from Harris County, Houston, Texas, and the witness is located in Jefferson County, Beaumont, Texas. Counsel, please state your appearances and county, city, and state location for the record, beginning with the noticing attorney.
- Cassandra Diaz** 00:01:04
My name is Cassandra Diaz. I represent Lowe's Home Centers, LLC I am located in Austin, Texas. Travis County.
- Mark Sparks** 00:01:13
Mark Sparks, Jefferson County, Beaumont, Texas. I represent the plaintiff, Shamika V.
- Notary** 00:01:18
All right, thank you. Before we begin, I'd like to confirm the following for the record, the parties agree this deposition is being conducted remotely and non-steno graphically recorded via zoom by the noticing attorney and waive any objections based on remote attendance or the method of recording. Do the parties stipulate? I
- Mark Sparks** 00:01:35
Sure.
- Cassandra Diaz** 00:01:36
Yes.
- Notary** 00:01:37
I will now swear in the witness. Shamika Vaughn, will you please raise your right hand? Do you solemnly swear the testimony you're about to give is the truth, the whole truth, and nothing but the truth?
- Witness** 00:01:49
Yes.
- Notary** 00:01:50
All right. You may put your hand down for the record. You stated that the last four digits of your Texas driver's license is 1685. Is that correct?
- Witness** 00:02:00
Yes.
- Notary** 00:02:02
All right, attorneys, you may proceed.
- Cassandra Diaz** 00:02:05

Chat with Transcript 📄 Insights Preview

Get started by typing your questions or needs in the box below.

Type Out What You Need:
Ask in normal language, just like you were sending a message to a member of your team.

What Can You Do?

- 🔍 Quickly Locate Key Points:**
 - A smarter search.
 - Try "Find all mentions of 'evidence' in John Doe's deposition."

- 📄 Create Summaries:**
 - No more getting lost in pages!
 - Try "Summarize the key points of this deposition."

- 📄 Prep for Review:**
 - Want to see what else is possible?
 - Try "What follow-up questions for this case should I ask?"

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📄 Summarize 🔍 ⬇️ 🗨️

The Easy Button

Don't want to think about prompts? One click and Scribe automatically analyzes the entire deposition for you.



Contradictions

Follow-Up Items

Unanswered Qs

Deposition of Tylin Mitsobar

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Search Transcript

Rough Transcript

- Notary** 00:00:57
Thank you. I'll now swear in the witness. Tyler Zabar, will you please raise your right hand. Do you solemnly swear the testimony you're about to give is the truth, the whole truth, and nothing but the truth?
- Tylin Mitsobar** 00:01:09
Yes.
- Notary** 00:01:10
For the record, you have provided the last four numbers of your valid government issued identification from Texas as 8 0 6 7. Is that correct?
- Tylin Mitsobar** 00:01:19
Yes.
- Notary** 00:01:20
Thank you. Attorneys, you may now proceed.
- Perrin Ybarra** 00:01:23
Thank you. Can you tell us your name please?
- Tylin Mitsobar** 00:01:26
Kylan Miar.
- Perrin Ybarra** 00:01:28
And where are you currently employed?
- Tylin Mitsobar** 00:01:30
Kalin Hospital.
- Perrin Ybarra** 00:01:31
And how long have you been with Kalin Hospital?
- Tylin Mitsobar** 00:01:34
About a year and a half.
- Perrin Ybarra** 00:01:36

Chat with Transcript

Insights Preview

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Ask a question...

Summarize

Upload. Compare. Conquer.

Upload your outline, exhibits, or any key PDF. Scribe compares them against the deposition transcript automatically.



Your Outline

Key Exhibits

Prior Transcripts



Dillard's

francesca's

Dillard's

Dillard's
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EMILY ORTEGA

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Search Transcript

Rough Transcript | Final Transcript

Notary 00:00:04
 Good morning, we're on the record. Today's date is January 28th, 2026, and the time is 10:42 AM Central Standard Time. This is the deposition of Emily Ortega, taken in the matter of Emily Ortega versus Simon Property Group, Simon Property Group, LP and Dillards in case number D one GN 24 0 0 9 3 71. My name is Mahoney, a notary commissioned in the state of Texas with my commission number being 5 4 5 0 2 0 0. I'm administering the oath from Washington County, Texas and the witnesses located in Travis County, Texas. Counsel, could you please state your appearances and locations, including county and state for the record, beginning with the noticing attorney

Scott Vasquez 00:00:58
 Scott Vasquez, Travis County, Austin, Texas for the plaintiff, Emily Ortega,

Crystal Andrade 00:01:04
 Crystal Andra in Travis County, Texas for the defendants.

Notary 00:01:11
 Thank you. Before we begin, I'd like to confirm the following for the record, the parties agree this deposition is being conducted remotely and being non stenographic recorded via Zoom by the noticing attorney and waive any objections based on remote attendance and method of recording. Do the parties so stipulate?

Scott Vasquez 00:01:33
 Uh, yes. Are you a certified Grapher recorder?

Notary 00:01:37
 So I am a certified Notary Republic notary public, um, in the state of Texas. And, um, I can swear in witnesses for nons stenographic depositions.

Scott Vasquez 00:01:49
 Okay, same with me.

Notary 00:01:53
 All rightly. Um, okay, so thank you. I'll now swear in the witness. Emily Ortega, would you please raise your right hand?

Witness: Emily Ortega 00:02:03
 Yes.

Notary 00:02:04
 Do you solemnly swear or affirm the testimony you're about to give is the whole, the truth, the whole truth, and nothing but the truth?

Witness: Emily Ortega 00:02:14
 Yes.

Notary 00:02:15
 For the record, you provided the last four digits of your Texas driver's license as 3 6 5 6, is that correct?

Witness: Emily Ortega 00:02:24
 Yes.

Chat with Transcript | Insights | Preview

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Have I covered everything from my deposition outline? Is there anything that is not in my outline that I should follow-up on? If so, draft sample questions for me. Exclude all

Summarize | [Icons]

Walk Away With More Than Just Notes

Full Transcript

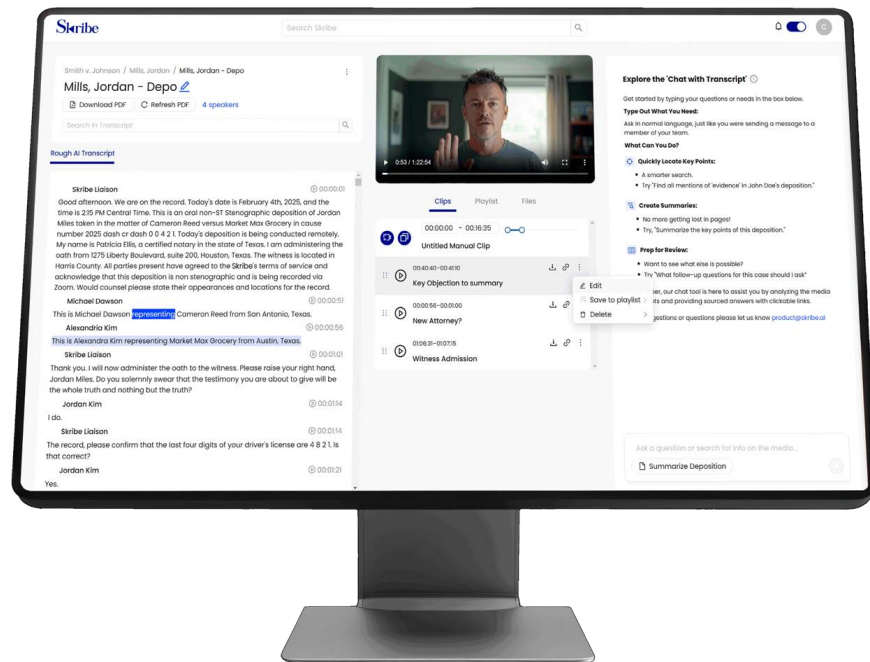
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Find key moments in seconds instead of hours.

AI-Powered Insights

Summarize, analyze, and speed up next steps.



In the matter of:
JACK COURTNEY V. ALBERTSON'S GROCERY STORE

Deposition of



SHANE DENNISON

Date: October 16, 2025

Total Time: 0 hr 58 min



Skribe

Testimony lives here

AMERICAN ARBITRATION ASSOCIATION

JACK COURTNEY,
PLAINTIFF,

VS.

ALBERTSON'S GROCERY STORE,
DEFENDANTS.

CASE NO. 01-24-0000-1179

NON-STENOGRAPHIC DEPOSITION

OF SHANE DENNISON

VOLUME 1 OF 1

OCTOBER 16, 2025

NON-STENOGRAPHIC DEPOSITION OF SHANE DENNISON,
HAVING BEEN DULY SWORN BY ALBA VILLALTA, NOTARY PUBLIC IN
AND FOR THE STATE OF TEXAS. THE WITNESS APPEARED REMOTELY
FROM ROANOKE, TEXAS - DENTON COUNTY FROM 10:04 AM TO 11:12
AM CENTRAL, PURSUANT TO TEXAS RULES OF CIVIL PROCEDURE AND
ANY PROVISION STATED ON THE RECORD OR ATTACHED HERETO, AND
SKRIBE, INC.'S TERMS & CONDITIONS OF SERVICE.

APPEARANCES OF COUNSEL

ON BEHALF OF THE PLAINTIFF, JACK COURTNEY:

JARED W. CAPPS
DASPIT LAW FIRM
600 NORTH PEARL STREET
SUITE 2205
DALLAS, TEXAS 75201
469-206-8210
JCAPPS@DASPITLAW.COM

APPEARED VIA VIDEOCONFERENCE

ON BEHALF OF THE DEFENDANT, ALBERTSON'S GROCERY STORE:

TREK DOYLE
DOYLE & SEELBACH, PLLC
13215 BEE CAVE PARKWAY
SUITE A220
AUSTIN, TEXAS 78738
512-960-4893
TREK@DOYLESEELBACH.COM
APPEARED VIA VIDEOCONFERENCE

INDEX OF EXAMINATIONS

1		
2	EXAMINATION	PAGE
3	EXAMINATION BY MR. DOYLE:	6
4	EXAMINATION BY MR. CAPPS:	36

INDEX TO EXHIBITS

7	NO.	PAGE
8	Exhibit 4	13
9	Exhibit 8	23

1 THE NOTARY: We are now on the record. Today's

2 date is October 16, 2025, and the time is 10:04 a.m.
 3 Central Standard Time. This is the deposition of Shane
 4 Dennison taken under Jack Courtney v. Albertson's
 5 Grocery Store, under Case number 01-24-0000-1179.

6 My name is Alba Villalta, a certified notary
 7 public for the state of Texas. My commission number is
 8 132377088. I am administering this oath from Killeen,
 9 Bell County, Texas. And the witness is located in
 10 Roanoke, Denton County, Texas.

11 Counsel, please state your appearances and
 12 locations, county and state for the record, beginning
 13 with the noticing attorney.

14 MR. DOYLE: This is Trek Doyle with Doyle and
 15 Seelbach, and I'm physically -- I'm representing the
 16 respondent, and I'm physically located in Austin, Texas,
 17 Travis County.

18 MR. CAPPS: Jared Capps for the claimant, and
 19 I'm located in Dallas, Dallas County, Texas.

20 THE NOTARY: Thank you. Before we begin, I'd
 21 like to confirm the following for the record. The
 22 parties agree this deposition is being conducted
 23 remotely and non-stenographically, recorded via Zoom by
 24 the noticing attorney, and waive any objections based on
 25 remote attendance or the method of recording.



Post-Deposition

Next Steps with AI



DEMO

Identifying Gaps in Discovery

Let AI flag new facts, documents, and witnesses you haven't yet requested or deposed

WHAT YOU'LL SEE

- 1 AI reviews the full deposition transcript
- 2 Flags docs and witnesses not yet in discovery
- 3 Prioritizes gaps by relevance to your defense



Sample AI Prompt

"Review this plaintiff's deposition.

- (1) Identify any potential gaps in discovery and*
- (2) Draft requests for production, interrogatories, and request for admissions that we should consider sending to bolster the defense of this case."*

EMILY ORTEGA

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Search Transcript

Rough Transcript Final Transcript

Notary 00:00:04

Good morning, we're on the record. Today's date is January 28th, 2026, and the time is 10:42 AM Central Standard Time. This is the deposition of Emily Ortega, taken in the matter of Emily Ortega versus Simon Property Group, Simon Property Group, LP and Dillard's in case number D one GN 24 0 0 9 3 71. My name is Mahoney, a notary commissioned in the state of Texas with my commission number being 5 4 5 0 2 0 0. I'm administering the oath from Washington County, Texas and the witnesses located in Travis County, Texas. Counsel, could you please state your appearances and locations, including county and state for the record, beginning with the noticing attorney

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Scott Vasquez, Travis County, Austin, Texas for the plaintiff, Emily Ortega,

Crystal Andrade 00:01:04

Crystal Andra in Travis County, Texas for the defendants.

Notary 00:01:11

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Scott Vasquez 00:01:33

Uh, yes. Are you a certified Grapher recorder?

Notary 00:01:37

So I am a certified Notary Republic notary public, um, in the state of Texas. And, um, I can swear in witnesses for nons stenographic depositions.

Scott Vasquez 00:01:49

Okay, same with me.

Notary 00:01:53

All rightly. Um, okay, so thank you. I'll now swear in the witness. Emily Ortega, would you please raise your right hand?

Witness: Emily Ortega 00:02:03

Yes.

Notary 00:02:04

Do you solemnly swear or affirm the testimony you're about to give is the whole, the truth, the whole truth, and nothing but the truth?



00:00:00 - 00:16:51

Untitled Manual Clip

Create Your First Clip

- Highlight the text you want to save.
- Click 'Create clip' that pops up near your selection.
- Your clip will show up here.

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admissions that we should consider sending to bolster the defense of this case. Exclude medical issues.

Summarize

DEMO

Ask a Question. Get Video Clips.

Ask any question and AI analyzes the entire deposition, creates video clips of relevant testimony

WHAT YOU'LL SEE

- 1 Type a question in plain English
- 2 AI finds and clips relevant video testimony
- 3 Get a text answer plus ready-to-share clips

How It Works

"Did the witness make any admissions about how the car accident happened?"

AI returns:

- ✓ A written answer with analysis
- ✓ Auto-generated video clips
- ✓ Timestamped citations





🏠 / 1335 - Jaime Medina and Cla... / CLAUDIA PAEZ

CLAUDIA PAEZ [🔗](#)

Search Transcript

- 16 +

🔍

Rough Transcript

Final Transcript

Preview

Regular View

Scribe View

14		answers to related to this accident?
15	00:08:38	A: No.
16	00:08:45	Q: Okay. In the test that they gave you for that
17		discussion, what types of information were you having
18		issues recalling?
19	00:08:55	A: Example: Walk into a room -- go -- walk from
20		one room to another to do something, and by the time I
21		walk in there, I have completely forgotten. That happens
22		all the time.
23	00:09:08	Q: Okay. Thank you. All right. Is there any
24		reason that you believe you could not tell the truth to
25		the questions that I'm asking today?
9:01	00:09:25	A: No.
02	00:09:25	Q: Other than the discussion that we've
03		discussed, do you have any type of disability that would
04		affect your ability to answer questions today?
05	00:09:32	A: No.
06	00:09:34	Q: Is there anything else that you are aware of
07		that would keep you from giving a full, complete, and
08		accurate answer to any questions I ask you today?
09	00:09:42	A: No.
10	00:09:42	Q: Great. Have you reviewed any documents or
11		photos to prepare for your deposition today? And that's
12		a yes or no question.
13	00:09:54	A: Yes.
14	00:09:56	Q: Okay. Did you review the accident report for
15		this deposition?
16	00:09:59	A: Yes.
17	00:10:01	Q: Have you spoken with anyone else besides your
18		attorney in the last month about your accident or this
19		deposition?
20	00:10:08	A: Yes, my boyfriend that I live with, Jaime.
21	00:10:11	Q: And that's the additional plaintiff in this
22		case, correct?
23	00:10:14	A: Yes.
24	00:10:15	Q: Okay. What is your relationship with Jaime
25		Medina?
10:01	00:10:24	A: He's my ex-husband and my current boyfriend.



Clips

Playlist

Files

00:00:00 - 00:18:44

Untitled Manual Clip

- Accident details and contact with other parties
 00:23:57-00:39:23 P.1934-P.3011
- Deposition Clip
 00:01:15-00:03:26 P.118-P.14

Chat with Transcript

Insights

Preview

①

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How did the witness describe whether the impact was heavier on the passenger side or the driver side of the vehicle?

Summarize

Clear History

AI generated - not legal advice



Automatic Page & Line Numbers

All clips — including those created from the rough transcript — are automatically updated with official page and line numbers once the final transcript is ready.



Clips Playlist Files

00:00:00 - 00:18:44

Untitled Manual Clip

⋮		Accident details and contact with other parties	00:23:57-00:39:23	P.19:14-P.30:11	⬅	⬇	🔗	⋮
⋮		Vehicle impact location	00:43:37-00:43:47	P.33:13-P.33:16	⬇	🔗	⋮	
⋮		Deposition Clip	00:01:15-00:03:26	P.1:18-P.4:4	⬇	🔗	⋮	

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Christopher Alleyne

16 Search Transcript

Rough Transcript Final Transcript Regular View Scribe View

00:00:03 THE NOTARY: We are on the record. Today is, Monday, December 29th, 2025. The time is 1:45 p.m., Central Standard Time. This is the deposition of, Christer Alleyne (sic) taken under the cause number, 01-25-0000-1663. My name is Keontrey L. McKenzie, a notary of, the state of Texas with the commission number 134969202. I'm administering this oath from Dallas County in, Dallas, Texas. The witness is located in Brazoria, County, Manvel, Texas. Counsel, can you please state your appearance, with county, city, and state and location for the, record, beginning with the scheduling attorney?

00:00:49 MS. DIAZ: My name is Cassandra Diaz. I, represent Respondent Costco Wholesale Corporation, and I, am located in Austin, Texas, Travis County.

00:01:00 MR. GARZA: This is Josue Garza. I am for the, claimant, and I am actually in Las Vegas, guys.

00:01:09 MR. PENA: Lupe Pena, also for the plaintiff, and I'm in Houston, Texas.

00:01:14 THE NOTARY: Thank you. Before we begin, I, would like to confirm the following for the record: The, parties agree that the deposition is being conducted, remotely and non-stenographically recorded viva (sic), Zoom by the noticing attorney and waive any objections, based on remote attendance or the method of recording. Do the parties stipulate?

00:01:31 MR. GARZA: Yes.

00:01:31 MR. PENA: So stipulated.

00:01:31 MS. DIAZ: Yes.

00:01:35 THE WITNESS: Yes.

00:01:37 THE NOTARY: Okay. Thank you for that. I will, now swear in the witness, Mr. Christopher, will you please raise your, right hand?

00:01:43 CHRISTOPHER ALLEYNE, having first been duly sworn, testified as follows:

00:01:48 THE NOTARY: Is that a yes or a no, sir?

00:01:54 THE WITNESS: Yes. Yes.

00:01:57 THE NOTARY: And for the record, you have, provided the last four numbers of your Texas driver's, license 1094, is that correct?

00:02:06 THE WITNESS: That is correct. Yes.

00:02:08 THE NOTARY: I thank you for the information, Attorney, you may proceed.

00:02:10 EXAMINATION

00:02:18 BY MS. DIAZ:

00:02:18 Q: Hi, Mr. Alleyne. Alleyne, right, correct?



Clips Playlists Files Exhibits

- 00:00:00 - 00:37:35
- Untitled Manual Clip
- 1 Prior employment with Target. 00:18:30-00:19:55 P:15.2-P:19.0
 - 2 Job duties as a Cashier. 00:12:10-00:12:27 P:11.8-P:11.12
 - 3 Safety rules for pushing a cart include being aware of the we... 00:26:11-00:26:35 P:21.2-P:21.8
 - 4 He was properly trained and did not request any additional tr... 00:28:14-00:28:23 P:22.19-P:22.22
 - 5 Customer push carts and are not trained. 00:25:39-00:26:09 P:20.10-P:21.1
 - 6 No specialized training on how to push a cart. 00:24:36-00:24:55 P:19.15-P:19.23
- Job duties for cashier.

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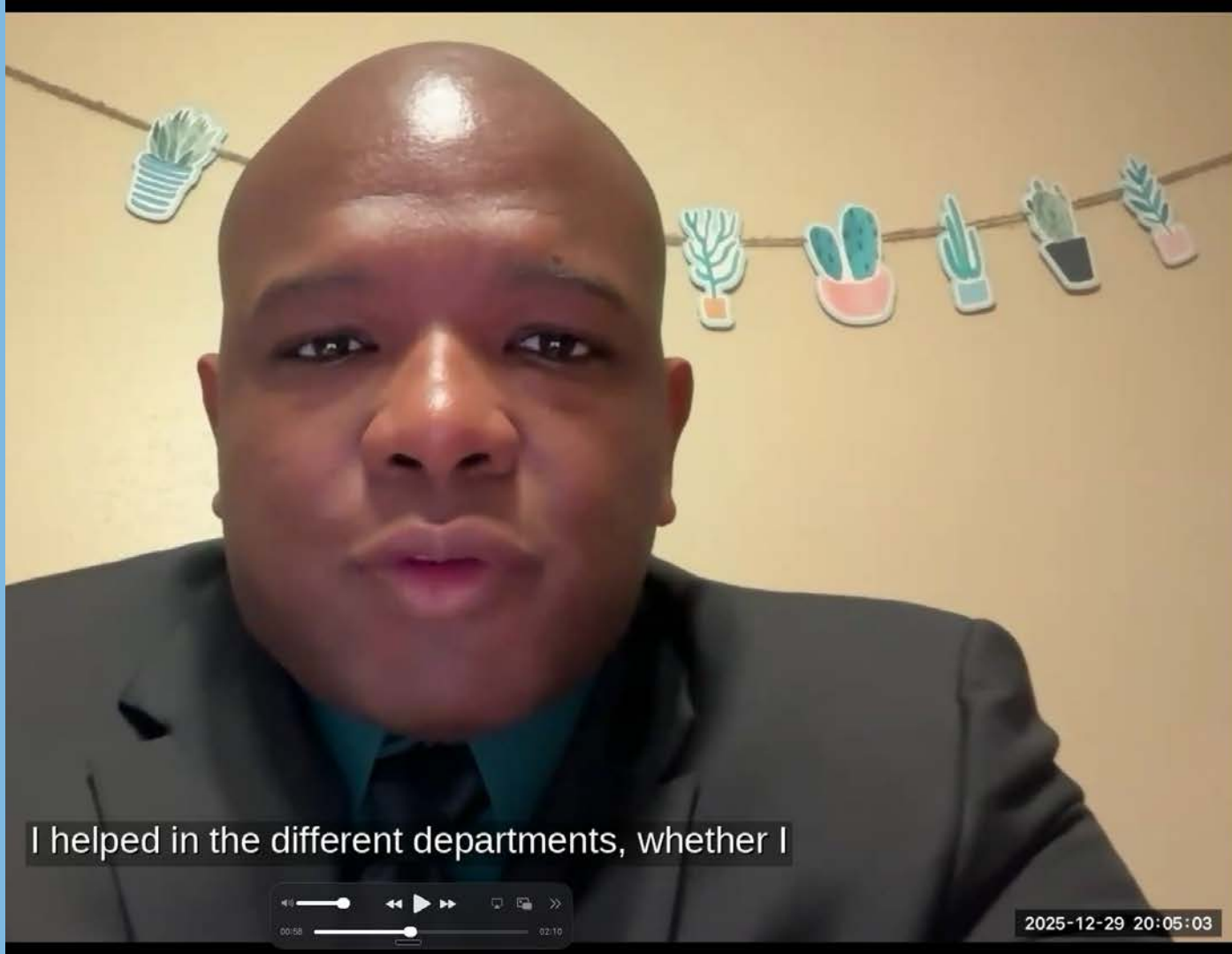
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Christopher Alleyne

16

Search Transcript

Rough Transcript Final Transcript Regular View Scribe View

00:00:03 THE NOTARY: We are on the record. Today is, Monday, December 29th, 2025. The time is 1:45 p.m., Central Standard Time. This is the deposition of, Christopher Alleyne (sic) taken under the cause number, 01-25-0000-1663. My name is Keontrey L. McKenzie, a notary of, the state of Texas with the commission number 134969202. I'm administering this oath from Dallas County in, Dallas, Texas. The witness is located in Brazoria, County, Manvel, Texas. Counsel, can you please state your appearance, with county, city, and state and location for the, record, beginning with the scheduling attorney?

00:00:49 MS. DIAZ: My name is Cassandra Diaz. I, represent Respondent Costco Wholesale Corporation, and I, am located in Austin, Texas, Travis County.

00:01:00 MR. GARZA: This is Josue Garza. I am for the, claimant, and I am actually in Las Vegas, guys.

00:01:09 MR. PENA: Lupe Pena, also for the plaintiff, and I'm in Houston, Texas.

00:01:14 THE NOTARY: Thank you. Before we begin, I, would like to confirm the following for the record: The, parties agree that the deposition is being conducted, remotely and non-stenographically recorded viva (sic), Zoom by the noticing attorney and waive any objections, based on remote attendance or the method of recording. Do the parties stipulate?

00:01:31 MR. GARZA: Yes.

00:01:31 MR. PENA: So stipulated.

00:01:31 MS. DIAZ: Yes.

00:01:35 THE WITNESS: Yes.

00:01:37 THE NOTARY: Okay. Thank you for that. I will, now swear in the witness, Mr. Christopher, will you please raise your, right hand?

00:01:43 CHRISTOPHER ALLEYNE, having first been duly sworn, testified as follows:

00:01:48 THE NOTARY: Is that a yes or a no, sir?

00:01:54 THE WITNESS: Yes. Yes.

00:01:57 THE NOTARY: And for the record, you have, provided the last four numbers of your Texas driver's, license 1094, is that correct?

00:02:06 THE WITNESS: That is correct. Yes.

00:02:08 THE NOTARY: I thank you for the information, Attorney, you may proceed.

00:02:10 EXAMINATION

00:02:18 BY MS. DIAZ:

00:02:18 Q: Hi, Mr. Alleyne. Alleyne, right, correct?



Clips Playlists Files Exhibits

- 00:00:00 - 00:37:35
- Untitled Manual Clip
- 1 Prior employment with Target. 00:18:30-00:19:55 P:15.2-P:19.0
 - 2 Job duties as a Cashier. 00:12:10-00:12:27 P:11.8-P:11.12
 - 3 Safety rules for pushing a cart include being aware of the we... 00:26:11-00:26:35 P:21.2-P:21.8
 - 4 He was properly trained and did not request any additional tr... 00:28:14-00:28:23 P:22.19-P:22.22
 - 5 Customer push carts and are not trained. 00:25:39-00:26:09 P:20.10-P:21.1
 - 6 No specialized training on how to push a cart. 00:24:36-00:24:55 P:19.15-P:19.23
- Job duties for cashier.

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not have any evidence that Defendants knew of any problem with the drain, and he did not have any evidence that Defendants knew of a “white object” on the ground, much less one that created an unreasonably dangerous condition. Below is a [deposition video clip](#)²¹ of the pertinent testimony:

Ex. B (6:13 – 7:18) – Plaintiff admits no evidence drain was a hazard or New Dairy knew of white object.

00:05:23 – 00:06:36



Jake Jones
Okay. Were there any problems with the drain that you were aware of?

John Selman
Nothing that I'm aware of.

The deposition transcript and video excerpt above show that, despite having entered the facility to fulfill hotshot orders at least 60 times previously, Plaintiff is not aware of any other injuries that occurred in the area where the milk crates were stacked or where the drain in question was located.²² Plaintiff also admitted that he

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Mr. Robert Thompson, Esq.
Thompson & Associates
1234 Defense Lane, Suite 500
Houston, TX 77002

RE: Demand for Settlement – *Smith v. Horizon Construction, Inc.*
Date: May 12, 2025

Dear Mr. Thompson,

We represent Ms. Emily Smith in the above-referenced matter concerning a severe workplace injury sustained on October 15, 2024, at a construction site managed by your client, Horizon Construction, Inc. This letter serves as a formal demand for settlement in the amount of \$4,000,000 to resolve all claims arising from this incident. Below, we outline the facts, liability, damages, and basis for this demand.

On October 15, 2024, Ms. Smith, a 32-year-old electrician, was working on the third floor of Horizon Construction's downtown Houston project site. While installing wiring, she tripped over an unmarked bundle of rebar left in a high-traffic walkway, falling 12 feet through an unguarded floor opening. The fall resulted in a traumatic brain injury, a fractured spine, and permanent partial paralysis. Horizon Construction failed to implement required safety protocols, including proper signage, barriers, and fall protection, in violation of OSHA standards and Texas workplace safety laws.

A key piece of evidence in this case is the testimony of Mr. James Carter, the site supervisor, who admitted during his deposition that Horizon Construction was aware of the unmarked hazards but failed to address them. Below is a video clip of this testimony, recorded using Skribe:



See video clip at <https://getskribe.ai/clip/12345678-abcd-9876-5432-abcdef123456>

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