

VADA Deposition Workshop



Sponsored by the VADA Young Lawyers Section

University of Richmond Jepson Alumni Center
Robins Pavilion
March 6, 2026

AGENDA

7.0 HRS CLE APPROVED

FRIDAY

8:30-8:45 Registration and Continental Breakfast

8:45-9:00 Welcome and Introductions

Rachel D. G. Horvath, *Piedmont Liability Trust*, President
Rebecca Roberts, *Moran Reeves Conn*, Young Lawyers Division Chair

9:00-10:00 Preparing Your Own Witness

Tate Love, *TimberlakeSmith*, Past President

This session will focus on the fine points of preparing a client for deposition. Among topics covered, participants will learn about the following topics:

- Deposition goals
- Limits on testimony
- Deposition preparation for success
- Source of factual information
- The importance of truth
- The importance of brevity
- Delivery of key messages
- The importance of studying key documents
- Use of objections and assertion of privileges
- Scientific literature
- Hypothetical questions
- Demeanor in stenographic and video depositions

10:00-10:45 Deposing Medical Experts

Samuel Bernier, *Frith Anderson & Peake*, At Large Board Member

This session will cover how to prepare for medical expert depositions, including taking depositions of plaintiff's experts, and preparing for and defending the depositions of defense experts. Deposition topics to consider and strategies to employ will be covered. Among other things, the session will stress the importance of medical records review, and considerations for Rule 4:10 Examinations.

10:45-11:00 Break

11:00 – 12:00 Common Deposition Challenges and Tips for Avoiding Pitfalls

Samuel Bernier, *Frith Anderson & Peake*, At Large Board Member
Kathryn Bonorchis, *Lewis Brisbois*, Potomac Regional Director
Gracemarie Braunberg, *Planet Depos*
Joshua Tubbs, *Planet Depos*

Difficult depositions are those that propose special problems, especially for less experienced lawyers, such as dealing with difficult opposing counsel, a domineering senior lawyer, a sympathetic witness (child, elderly, mentally disabled) or privilege issues. This session will cover strategies to prepare for and deal with these situations, look at applicable case law, and discuss when issues require calling a judge. We will also look at issues posed by remote depositions, including use of software, presenting exhibits, and trying to connect with a witness virtually.

12:00 – 1:00 Exhibition of Depositions by Senior Attorneys Acting Roles of Deposition Parties

Kathryn Bonorchis, *Lewis Brisbois*, Potomac Regional Director
Drake Hudgins, *Hudgins Law Firm*, Professional Liability Section Vice Chair
Tate Love, *TimberlakeSmith*, VADA Past President

Using the NITA case file, the session presenters will roleplay various scenarios in the case file, illustrating the deposition challenges inexperienced lawyers may face and options for overcoming them. The session will include a critique of each roleplay as well as allow for questions and answers. Session will also include a demonstration of real-time transcription, live-streamed to your device or hardware.

1:00-2:00 Working Lunch and Finalize Deposition Outlines with Assistance of Coaches

2:00-5:15 Mock Depositions

Breakout sessions, each comprising

4-6 associates
1 senior attorney
Deponent role players

2:00-2:45: Round 1 and Feedback
2:45-3:30: Round 2 and Feedback
3:30-3:45: Break
3:45-4:30: Round 3 and Feedback
4:30-5:15: Round 4 and Feedback

We will do four rounds of depositions, with attendees rotating between attorney roles, deponents and observing. The roles are found in the NITA case file – information about ordering the case file will be sent after registration. Additional registrants will observe and give constructive feedback.

Coaches

Kathryn Bonorchis, *Lewis Brisbois*, Potomac Regional Director (*Richmond Library*)
Rachel D. G. Horvath, *Piedmont Liability Trust*, President (*Rosenbaum*)
Drake Hudgins, *Hudgins Law Firm*, Professional Liability Section Vice Chair (*Eskandarian*)
Tate Love, *TimberlakeSmith*, Past President (*Robins Pavilion*)
Stewart R. Pollock, *Moran Reeve Conn*, Capitol Region Director (*Quigg*)

5:30 Optional Off-Site Young Lawyers Happy Hour

Mosaic Restaurant (6229-A River Road, Richmond, VA 23229)