

**NCPA's 39th ANNUAL MEETING & SEMINAR**  
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# **Locating & Scheduling Witnesses**

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**President of Abextra, Inc.**  
**Certified Verbatim Reporter for Huseby Global  
Litigation**

Seminar Topic: Locating and Scheduling Witnesses

To be presented first at the North Carolina Paralegal Association Annual Seminar April 2019

By: Bonnie Ruffin, NCCP, CLVS, CVR

President of Abextra, Inc.

Certified Verbatim Reporter for Huseby Global Litigation

Bonnie has worked as a litigation trial paralegal for many years and also owned and operated a litigation support company for 16 years. She is a North Carolina Certified Paralegal, a Certified Legal Videographer, and a Certified Verbatim Court Reporter. She currently works as a Certified Verbatim Court Reporter for Huseby Global Litigation Support and owns and operates Abextra, Inc. which helps small businesses with marketing and sales strategies.

This seminar will help you understand the importance of how to effectively locate witnesses for meetings, depositions, and trial. Once you have located the witness the way you communicate with them will either help you build a rapport with them or seal the end of the conversation.

The techniques conveyed in this seminar have been used for many years by Bonnie Ruffin to locate and schedule both lay and expert witnesses involving medical malpractice suits. Topics include:

How to get the meeting.

How to handle rejection.

How to build rapport.

Being mindful of what you say.

# LOCATING AND SCHEDULING WITNESSES

Witnesses both Lay and Expert

By: Bonnie Ruffin, NCCP, CLVS, CVR  
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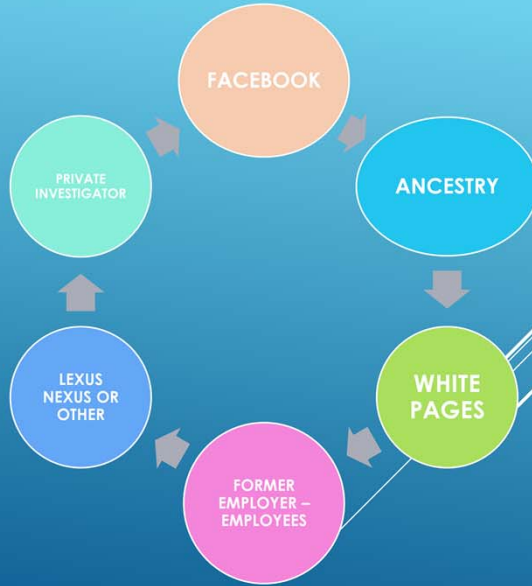
# EVIDENCE AT TRIAL

- PLAINTIFF
- DEFENDANT

- LAY WITNESSES
- EXPERT WITNESSES

- DOCUMENTS
- DEMONSTRATIVE

## WHERE/HOW TO LOCATE LAY WITNESSES



FAMILY

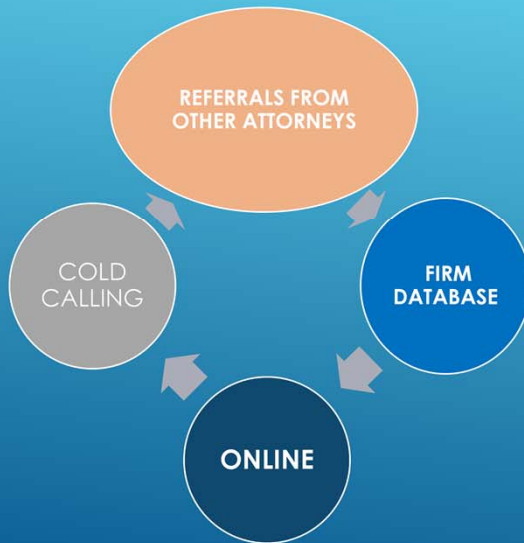
WORK

FRIENDS

NEIGHBORS

4

# LOCATING EXPERT WITNESSES



## DIFFERENCES BETWEEN LAY WITNESS & EXPERT WITNESSES

Unpaid	Paid
Ordinary	Professional
Reluctant	Eager/Glad

6



## TWO DIFFERENT APPROACHES SAME GOAL



## 6 EFFECTIVE WAYS TO GET WHAT YOU WANT NOW

- Ask and be specific.
- Don't apologize.
- Make your gain their gain.
- Make yourself invaluable.
- Be prepared for your want to be fulfilled.
- Persistence.
- Be mindful of what you say. This may be Repeated in a deposition or trial.

Forbes.com – Jennifer Cohen Contributor

## STAYING IN CONTACT

- Confirm contact information: work, home, cell.
- Text your name and number.
- Confirm place and time of meeting the day before.
- Text attorney their contact info.
- Follow-up for depositions or trial as needed.
- Always thank them for their time.