



COST EFFECTIVE. EFFICIENT. DIVERSE.

Witness Kit Preparation

A high-quality, competitive solution to facilitate case preparation and resolution.

THE CHALLENGE

Preparing witnesses for testimony in depositions, arbitrations, and trials can present significant challenges—from determining key players, defining key time periods applicable to each witness, and identifying key documents required to support witness testimony.

OUR SOLUTION

WLS can provide cost-effective and efficient litigation services to firm clients to support case preparation and resolution. Employing various analytical tools, WLS team members can utilize the knowledge gained reviewing documents and pleadings to prepare witness kits for use in depositions, arbitration, and trial preparation.

WLS builds upon Winston's Chambers and Legal 500-ranked in-house managed review capabilities, staffed by our highly experienced review attorneys, who employ cutting-edge analytical tools and review processes.

CLIENT BENEFITS

Below are several ways in which our witness kit preparation service benefits clients.

- Cost Effectiveness. Clients get large law firm quality work product at extremely reasonable rates.
- **Reputation and Credibility.** Winston's many years of experience conducting large-scale managed review projects provides added client value, efficiency, and security over other firms without a focus in this area.
- Deep Resources. The client benefits by having its lower tier/risk work done by the same fullservice firm that is internationally known for handling the largest and most complex litigation. Thus, the client gets the full range of deep resources and capabilities in a "one-stop shopping" experience.
- **Diversity.** Clients benefit from having a diverse team of top-notch lawyers handling their assignments.
- Opposing Parties. Because of our vast experience in developing many witness preparation kits for clients, we often see the same parties and their counsel on the other side of subsequent litigation. Having managed witness testimony with these parties and attorneys, we are able to draw from prior experience and save the client time and money vs. reinventing the wheel each and every time.

HOW WE GET THE JOB DONE

At the outset of each client engagement, we work with clients to establish a customized plan that considers your unique protocols, specific case strategy, communication escalation points, and format of the final deliverables.

We recognize that each client's needs and expectations are distinct, requiring a tailored approach to ensure seamless integration with your in-house team. We offer the following workflow illustration to give you an example of how we work with clients. This is just a sample of our flexible approach, designed to demonstrate our ability to adapt and provide bespoke legal services.

Our ultimate goal is to ensure that your witness preparation process is as streamlined and effective as possible, while maintaining the highest standards of legal scrutiny and protection.

Let us be your solution!



SCOTT COHEN MANAGING DIRECTOR New York +1 (212) 294-3558 scohen@winston.com



MARCIA BOBB, ESQ. SENIOR MANAGER Houston +1 (713) 814-9213 mbobb@winston.com

DEFINE PROCESS

- Identify the appropriate document storage and management option based on the size and complexity of the matter (e.g., local, SharePoint, HighQ).
- Communicate with the litigation team and/or client to determine the priority of the witness reviews, categories of information to be addressed in the witness kits, and the form of the final deliverable.

WITNESS KIT COMPLETION

Provide deliverables to client in accordance with defined process and established deadlines.

IDENTIFY KEY PLAYERS

- Perform a preliminary analysis of the key witnesses by leveraging the custodian list, produced documents, and incoming productions to identify key players for whom witness kits are needed.
- Communicate with the litigation team and client to understand the role each witness played in matter and the substantive categories of importance for each witness.
- Create a summary document with initial findings.

IDENTIFY KEY TIME PERIODS APPLICABLE TO EACH WITNESS • Leverage the documents to

build a timeline for each witness's involvement.

IDENTIFY THE KEY DOCUMENTS

- Use potentially significant documents tagged by the review team as a starting point for identifying key documents for each witness.
- Use search terms, concept clustering, concept searching, and Technology Assisted Review to mine the database for additional key documents for each witness.
- Tag helpful documents to help strengthen the case.
- Tag documents that might be harmful to get ahead of issues that may weaken the case.
- Group documents according to themes for each witness to facilitate deposition outline development.