

[Your Law Firm Name]  
[Your Address]  
[City, State, Zip Code]  
[Phone Number]  
[Email Address]

[Date]

[Videographer Name/Company]  
[Address]  
[City, State, Zip Code]

**RE: Letter of Instruction for Videotaped Deposition**

**Case Name:** [Case Name]  
**Case Number:** [Court Case Number]  
**Witness:** [Medical Expert Name]  
**Date:** [Date of Deposition]  
**Time:** [Start Time]  
**Location:** [Address or Zoom/Remote Link]

Dear [Name of Videographer],

This letter serves as your formal instruction for the videotaped deposition of the medical expert listed above. Please adhere to the following requirements:

1. **Arrival:** Please arrive at least [30/60] minutes prior to the start time to set up and test equipment.
2. **Background:** Ensure a professional, neutral background. Avoid distracting elements or windows that may cause backlighting issues.
3. **Audio:** High-quality audio is critical. Please provide a lapel microphone for the witness and separate microphones for questioning attorneys.
4. **Framing:** Maintain a "talking head" medium shot (head and shoulders) of the witness. Please adjust the zoom if the witness needs to demonstrate a medical device or refer to an anatomical model.
5. **Exhibits:** Be prepared to capture close-ups of medical records, X-rays, or physical evidence if requested during the testimony.
6. **Time Stamps:** An on-screen digital time stamp must be visible at all times in the recording.
7. **Media Format:** Upon completion, please provide the final video file in [MP4/MPEG] format via [Cloud Link/USB/DVD]. Please also provide a synchronized file compatible with [Trial Presentation Software Name, e.g., TrialPad/Sanction].
8. **Confidentiality:** This matter involves sensitive medical information. The footage must be handled in compliance with HIPAA and legal confidentiality standards.

Please contact our office at [Phone Number] immediately to confirm your availability and receipt of these instructions.

Sincerely,

[Your Signature]

[Your Printed Name]

[Your Title]