Below are responses by our Judges regarding how they handle deposition problems.

**Judge Bohm:**

1. I will conduct an emergency telephonic hearing while I am on the bench so that a record is made and can be transcribed;
2. I do not require that an emergency motion be filed. The attorneys at the deposition simply need to notify my case manager and then she will notify me. I will then tell my case manager when the attorneys should call in for the emergency hearing (which I try to hold as soon as possible so that the deposition is not delayed).   If the attorneys prefer not to have a telephonic hearing but rather  want to come to the courtroom and introduce evidence, then they should let my case manager know, and I will hold the evidentiary  hearing as soon as possible (hopefully, on the same day if not within an hour or two); and
3. If the attorneys want to adduce testimony from the court reporter, then he/she needs to come to court. Otherwise, I don't require the court reporter to come to the courthouse.
4. Finally, as a general rule, my view is that the attorney defending at a deposition has two objections that can be lodged:

(1) "Objection to the form of the question."  (And then the witness can proceed to answer);

(2) "Objection to the question because it invades the attorney/client privilege."  (And then the witness can be instructed not to answer).

An attorney who goes outside of these parameters does so at his/her peril.

**Judge Rodriguez**

I will conduct a telephonic hearing without a motion and during the deposition so as to not slow down discovery.  Parties need to call or email my case manager and request an emergency telephonic hearing and I will issue a ruling at the conclusion of the hearing.  If the parties contact chambers and get a voice message from my case manager it means that I am either traveling to another division or am on the bench.  The best way to get a hold of my case manager is to email her.  I will do whatever is necessary to accommodate the parties with an emergency hearing.  Evidentiary hearings will need to be conducted in the courtroom.

**Judge Isgur**

1.  I will conduct an emergency hearing.  If I am available, I would prefer a telephonic hearing from the deposition and I will rule on the phone.

2.  If I cannot do a phone hearing, I will do a court hearing.

3.  You can call my case manager without a motion.

4.  The need for the Court reporter is case specific.  If the dispute is over whether a matter is privileged, it can probably be done without an exact transcript.  If the dispute is over whether someone is being non-responsive, I would probably need to read or hear the precise question and answer.

**Judge Norman**

I do conduct emergency hearings by telephone for discovery disputes.  This is from my Courtroom Procedures:

"Discovery disputes that cannot be resolved between the parties should ordinarily be submitted by written motion. However, if a dispute arises during an oral deposition, a party may contact the Court at (713) 250-5252 during the deposition and request a telephonic hearing."

Its been my experience, at least in Shreveport, that these calls always seem to come at the most inopportune times.  So when a timely telephone conference is not available, I will enter an order setting a hearing based on the discovery dispute on an expedited basis.  I have heard these matters by telephone, while my preference is a courtroom hearing, I have heard these matters by a telephone hearing when all parties agree.

**Judge Jones**

1. Yes I will conduct telephonic hearings.
2. A Motion is not needed – you can call the case manager.
3. If you want something complicated or affirmative beyond an answer, I’d prefer a motion. If all you want is an answer, time is most important and a phone call will do.
4. I think it worthwhile to think about whether you want a telephonic heading or an actual hearing. Depends on your goals.
5. Having the court reporter available depends on the nature of the dispute.