

# Exhibit 1

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# 3 Key Factors For Successful Depositions in Germany

Although organizing depositions in Germany can have its challenges, we have found that by taking the right steps you can be sure to make it a success. Follow these basic guidelines and your next deposition in Germany will run as smoothly as it would in the U.S.

# Start Planning Early for Depositions in Germany

If you want your deposition in Germany to be done by the book, you'll need to start planning a few months ahead of time. Germany tightly restricts where a deposition may be held and the deposition of a willing witness must be taken on U.S. consulate grounds. The consulate in Frankfurt needs at least six weeks of advance notice and you'll need to reserve their conference room according to availability. This is typically not cheap – you're looking at over USD \$1,000 per day, plus additional fees just for the conference room and consular services.

# Options for Depos Outside of Germany

If you're under time constraints and don't have six weeks ahead of time to plan, moving your deposition outside of Germany is a good way to expedite matters. Travel within Europe is relatively hassle-free and Europeans travel more than all other regions on the planet! Your German witness could easily travel to a neighboring country where deposition-taking is less restrictive. I suggest one of the following U.S. deposition friendly countries: Belgium, the Netherlands, Poland or Italy.

# Finding the Perfect Local Deposition Services in Germany

The final key factor for a successful depo in Germany is finding the perfect local deposition services for your law firm. When possible you always want to go local. Local court reporters, legal videographers and interpreters mean no travel costs and provide an expertise that can't be duplicated. It's a win win situation!

Optima Juris has local reporters in Germany and throughout Europe who are professionals with extensive experience conducting U.S. depositions abroad. With over 15 years of providing local deposition services in Germany, we have more experience than any other firm on the planet! We are your go-to resource for any questions about setting up a deposition abroad (http://optimajuris.com/contact-us/) and we love showing off our knowledge so don't be shy about contacting us.

Want to Find Out More

For more information on conducting a deposition in Germany please check out our previous blog article: http://www.optimajuris.com/international-depositionblog/taking-voluntary-depositions-of-willing-witnesses-in-germany-775/ (http://www.optimajuris.com/international-deposition-blog/taking-voluntary-depositions-ofwilling-witnesses-in-germany-775/)

You can see the step-by-step process by clicking on the link below: http://germany.usembassy.gov/acs/judicial-assistance/ (http://germany.usembassy.gov/acs/judicialassistance/)

For further information related to conducting international depositions, please click on the following link: http://optimajuris.com/frequently-asked-questions/ (http://optimajuris.com/frequently-asked-questions/)

My goal is always to make this process as easy for you as if you were arranging a depo in the States! So don't hesitate to ask me anything (http://optimajuris.com/contact-us/) — that's my specialty!



### Kimberlee Castro (Http://Optimajuris.Com)

Global Deposition Expert at Optima Juris (http://optimajuris.com)



Kimberlee Castro has over 14 years of experience in the legal industry and is currently a Global Deposition Expert with Optima Juris. As a certified court reporter herself, Kimberlee offers a unique and original viewpoint for solving complex deposition logistics abroad. Always staying on top of the latest trends and topics, Kimberlee has the most up-to-date information and data on setting up a deposition for every region of the world. Kimberlee is personally available to answer any of your questions and will make setting up your deposition, arbitration, or hearing a much more manageable process. With her friendly and personable attitude, Kimberlee is the perfect liaison to handle all the complexities that come along with an international proceeding! Let her show you how easy she can make it.



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