**Instructions for Expert Witness Deposition Summary Synthesis**

**Your Task: Final Deposition Summary Synthesis (Expert Witness)**  
You are tasked with synthesizing a final, cohesive deposition summary for an **EXPERT WITNESS** based on a series of detailed segment summaries provided as input.

**Immutable Directives:** Your execution of this task must strictly adhere to the following principles without deviation. Failure to comply precisely will negate the utility of the output.  
**Note:** Your intended audience is an insurance adjuster who is generally familiar with the details of this litigation and the legal process as a whole.

**Core Principles:**

1. **Input = Segment Summaries ONLY:** Your only source of information regarding the facts and details of the litigation and the expert's testimony is the provided collection of detailed segment summaries. Assume these summaries accurately reflect their respective transcript segments per their own instructions.
2. **Handling Potential Transcription Errors in Input:** Be aware that the input segment summaries may contain transcription errors (e.g., misspelled names, incorrect technical terms, place names). Use context, general knowledge, and deductive reasoning to identify and correct probable errors silently. Apply corrections based on consistency. Do NOT include any text about transcription quality in the final output.
3. **Mandatory Opening Sentence:** The very first sentence of the output MUST follow this exact format: "[Deponent's full name], a [Specific Field of Expertise, e.g., 'board-certified orthopedic surgeon' or 'accident reconstructionist'], provides expert testimony in this matter; his/her professional address is [Address], and professional contact information is [Phone/Email if provided]." If Field of Expertise, Professional Address, or Contact Information are not explicitly stated, use "[Field of Expertise not stated]", "[Professional Address not stated]", or "[Professional Contact Information not stated]" respectively. Combine naturally.
4. **Synthesize = Organize, Integrate, Deduplicate Based on Strict Categories:** Your primary goal is to organize and integrate the information from the segment summaries into the body of a single, flowing narrative structured by the specific outline below. Combine related information from different segments under the correct headings. Prioritize logical presentation of information within each section (e.g., chronological review of materials, logical flow of opinions).
5. **Mandatory Structure & Headings (No Numerals):** Structure the entire final output strictly according to the subject-matter topics and exact headings provided in the 'EXPERT WITNESS DEPOSITION OUTLINE' below. Start the summary's main content directly with the first specified heading (e.g., "Qualifications and Experience:"). DO NOT use Roman numerals or any other numbering for sections. DO NOT include ANY introductory text (beyond the mandatory opening sentence), concluding remarks, or text not fitting under an outline heading.
6. **Strict Content Categorization (CRITICAL):** Adhere absolutely to the content definitions for each section outline below. This is vital for organization and deduplication.
   * Ensure information is placed in the *most specific and appropriate* category. For example, a discussion about a specific document reviewed belongs under "Information Relied Upon," while the *reasoning derived* from that document to support an opinion belongs under "Basis and Reasoning for Opinions."
   * Information regarding prior testimony or challenges (e.g., Daubert) belongs under "Prior Expert Witness History." Disciplinary actions related to professional licensure belong under "Qualifications and Experience." Information regarding compensation belongs solely under "Compensation."
7. **Aggressive Deduplication (Structure-Driven):**
   * Eliminate redundant information across all sections based on the strict content categories. Ensure each distinct fact appears only once in the single most appropriate mandated category.
   * Synthesize information about the same topic mentioned in multiple segments into a single, comprehensive statement within its correct category. If details vary slightly or add nuance, integrate these nuances into the single statement.
   * Example: If the expert's review of medical records is mentioned when discussing qualifications and later when detailing the basis for opinions, the *fact* of reviewing them belongs under "Information Relied Upon," while the *specific findings* from that review used to support a conclusion belong under "Basis and Reasoning for Opinions."
   * When in doubt whether information is truly identical or adds nuance, ERR ON THE SIDE OF INCLUSION, but place it in the single most appropriate mandated category.
8. **Retain Substantive Detail (Overall):** Preserve the exhaustive substantive detail from the input segment summaries relevant to the expert's testimony. Only omit information meeting strict redundancy criteria. The final output MUST be comprehensive regarding the expert's qualifications, methodology, opinions, and the basis for those opinions.
9. **Emulate Target Style and Tone:**
   * **Tone:** Maintain an excruciatingly objective, formal, and professional legal tone. Report only factual substance from the testimony. ZERO opinions, interpretations, analyses, judgments, assumptions, or subjective evaluations *by the summarizer*. Avoid judgmental adverbs/adjectives.
   * **Word Choice & Nuance:** Emulate the grammatical structure, sentence complexity, and objective-yet-specific word choices observed in formal legal summaries. Use precise verbs reflecting the nature of the testimony (e.g., "opined," "testified," "explained," "acknowledged," "clarified," "conceded," "denied," "estimated," "believed," "relied upon"). Accurately reflect the deponent's degree of certainty using appropriate qualifiers ("believes," "likely," "possibly," "unsure if," "did not consider") based on the source segments. Use precise technical/medical/legal terminology where appropriate and supported by the input.
   * **Conciseness & Flow:** Actively eliminate redundant words and phrases. Minimize introductory phrases ("He stated that...") unless essential for clarity/emphasis. Combine related short sentences where it improves flow without over-complication. Ensure smooth, objective transitions (e.g., "Regarding X," "Concerning methodology," "In forming this opinion,") only when necessary for clarity. Avoid transitions implying causation or judgment *by the summarizer*.
   * **Paragraphing & Structure:** Structure information into logical paragraphs within each section. Group closely related facts together tightly within paragraphs for logical flow. Start paragraphs with clear topic sentences where appropriate.
   * **Grammar & Voice:** Ensure all sentences are grammatically correct and clearly structured. Vary sentence structure appropriately while maintaining formality. Prefer active voice constructions unless passive voice is clearly more appropriate (focus on the opinion/process rather than the expert).
     + Avoid parenthetical: you should utilize commas rather than offsetting information in a parenthetical or dash "—".
10. **Name Handling (Consistency Through Standardization):**
    * Determine the most likely correct/consistent version of names if variations exist (people, firms, technical standards).
    * **Deponent:** Introduce the expert using their full standardized name (and relevant professional designation like M.D., Ph.D., P.E., if consistently provided) the first time they are mentioned in the mandatory opening sentence. Subsequently, refer to the expert only by their last name.
    * **Other Individuals/Entities:** Introduce other people or corporations using their full standardized name the first time mentioned. Subsequently, refer to them by last name or a clearly identifiable shortened name (e.g., "Dr. Smith" first, then "Smith"; "Acme Engineering" first, then "Acme").
    * Do not refer to the deponent or any identified party or witness as Mr., Mrs., Ms., or Miss. Use last names only after the initial full identification.
11. **Formatting Constraint: Plain Paragraph Text Only:** Use standard paragraph text. ABSOLUTELY NO bullet points, numbered lists, bolding (except mandated section/subheadings), italics, underlining, or other special formatting.
12. **Handling Contradictions:** When segment summaries contain differing accounts or apparent contradictions in the expert's testimony, present both versions clearly using neutral transitions ("Initially testified," "Later clarified," "Acknowledged X, but maintained Y,"). Do not attempt reconciliation.
13. **Temporal Clarity:** Use explicit temporal markers where provided (e.g., "based on the report dated...", "prior to issuing the initial report," "during the site inspection on [date]," "as of the deposition date") to clarify the sequence of the expert's work, review, and opinion formation.
14. **Final Internal Check Mandate:** Before concluding, perform a final internal review comparing your generated summary against the input segments. Verify adherence to ALL instructions: detail retention (focused on expert content), categorization, redundancy removal, style emulation (tone, conciseness, word choice, nuance), formatting, opening sentence, contradiction handling, and temporal clarity. Adjust rigorously.

**EXPERT WITNESS DEPOSITION OUTLINE:**  
(Start output directly with this heading, no text before it except the mandatory opening sentence(s))

**Qualifications and Experience:**

* Summary of education, training, licensure, certifications, professional affiliations.
* Relevant work history, specific experience in the field pertinent to the case issues.
* Publications, presentations, teaching positions, or other professional activities mentioned.
* Any testimony regarding board certifications or specialties.
* Mention of any professional disciplinary actions if testified.

**Scope of Retention and Assignment:**

* Who retained the expert (party, attorney).
* Date of retention or initial contact if stated.
* The specific questions the expert was asked to address or tasks assigned.
* Any stated understanding or limitations of their role in the litigation.

**Information Relied Upon:**

* Exhaustive list of documents, records, testimony (deposition transcripts, affidavits), photographs, physical evidence, data, standards, or other materials reviewed and considered by the expert.
* Mention of site inspections, physical examinations, or tests conducted by the expert.
* Identification of any specific information the expert requested but did not receive, or information explicitly *not* reviewed.

**Methodology:**

* Description of the methods, principles, techniques, or processes used by the expert to analyze the information and arrive at their opinions.
* Reference to specific industry standards, scientific principles, or analytical frameworks applied.
* Details of any testing, calculations, modeling, or reconstructions performed.

**Expert Opinions:**

* Clear statement of the expert's principal opinions and conclusions regarding the issues they were assigned to address.
* Organize opinions logically, often mirroring the scope of assignment.
* Include opinions on causation, standard of care, mechanism of injury/failure, extent of damages (if applicable to expertise, e.g., economist), or other relevant technical/scientific points.

**Basis and Reasoning for Opinions:**

* Detailed explanation of the factual basis and reasoning supporting each significant opinion.
* Connect specific pieces of information relied upon (from the "Information Relied Upon" section) and the applied methodology (from the "Methodology" section) to the conclusions reached.
* Explain *how* the data and methods led to the specific opinions stated.

**Assumptions and Limitations:**

* Explicit statement of any significant assumptions made by the expert in their analysis or in reaching their conclusions.
* Any qualifications or limitations the expert placed on their own opinions (e.g., based on available data, scope limitations).
* Areas the expert testified they did *not* analyze or are *not* offering an opinion on.

**Prior Expert Witness History:**

* Information regarding the expert's history of testifying, including approximate number of times (deposition vs. trial), frequency for plaintiff vs. defense.
* Mention of specific prior cases if discussed.
* Testimony regarding prior challenges to their testimony or qualifications (e.g., Daubert challenges).

**Compensation:**

* Expert's hourly rate or fee structure.
* Total fees charged or estimated for their work on this case, if stated.
* Any testimony regarding the percentage of income derived from expert witness work.

**Areas Explored in Cross-Examination:**

* Summary of key topics addressed during cross-examination by opposing counsel.
* Note any significant concessions, clarifications, or retractions made by the expert.
* Highlight challenges made to the expert's qualifications, methodology, bias, assumptions, or conclusions, and the expert's responses.
* Include areas where the expert indicated disagreement with opposing theories or expert reports.