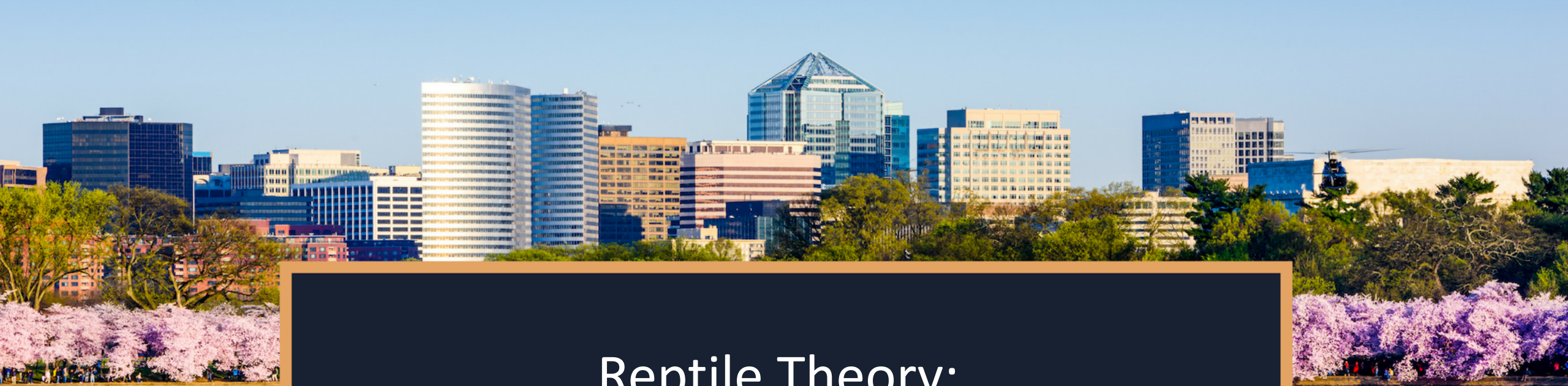




**Michael E. Phillips**  
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WASHINGTON D.C.

# Reptile Theory: Using the Primitive Brain to Increase Plaintiff's Verdicts

OCTOBER 2, 2019



**THE HOSPITALITY LAW  
CONFERENCE SERIES 2.0**



A green iguana is resting on a large, weathered log. The background shows a city skyline with various buildings and trees under a clear sky. The iguana is facing left, with its head resting on the log. The text is overlaid on the right side of the image.

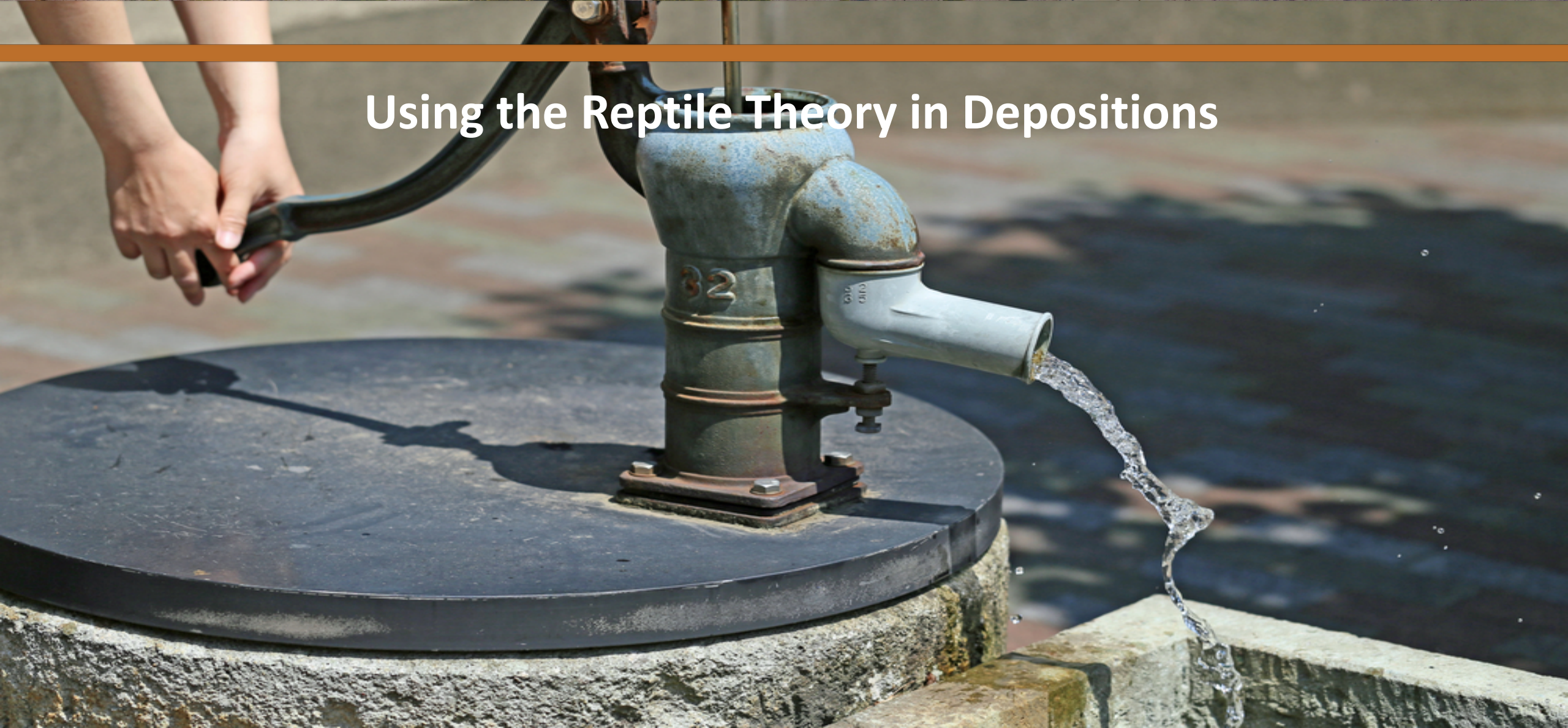
# Refresher – What is the Reptile Theory?

1. Safety Rules and the Reptile
2. Know Your Audience
3. The Justice System and the Reptile





# Using the Reptile Theory in Depositions







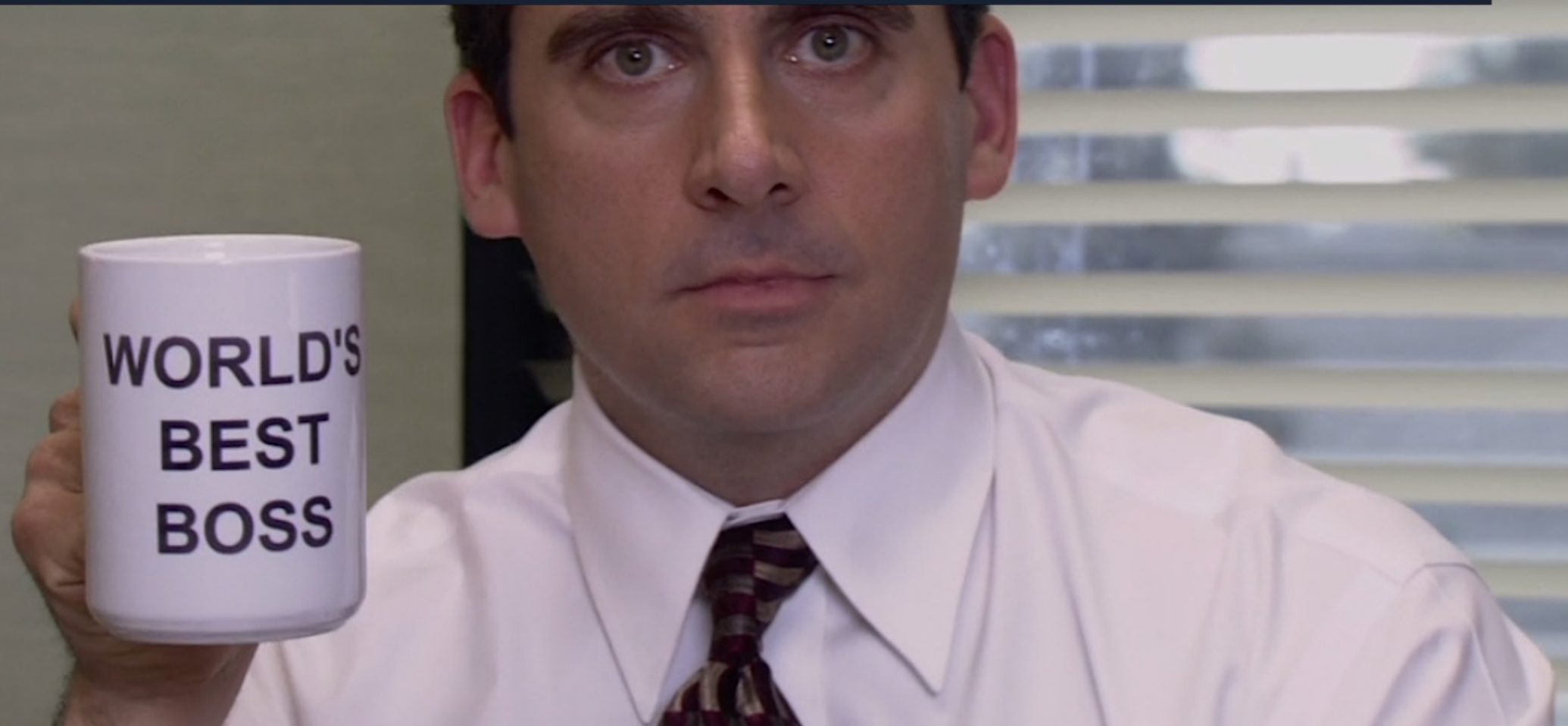
# Deposition Clips of a Franchisee







# Deposition of General Manager





A background image showing a cityscape with various buildings and green trees under a clear sky.

## Deposition of Front Desk Clerk

A white rectangular sign with a drop shadow, mounted on a light gray wall. The sign features the text 'Not a Clue' in a colorful, stylized font. The letters are: 'N' (blue), 'o' (orange), 't' (yellow), 'a' (blue), 'C' (green), 'l' (red), 'u' (blue), and 'e' (red).

Not a Clue





# Disgruntled Former Employee





# Defending against the Reptile Theory

