

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**In re: Oil Spill by the Oil Rig
“Deepwater Horizon” in the Gulf
Of Mexico, on April 20, 2010**

Applies to: *All Cases.*

* MDL No. 2179
*
* SECTION: J
*
* JUDGE BARBIER
* MAGISTRATE SHUSHAN

* * * * *

**ALL PARTIES OBJECTIONS TO DEPOSITION DESIGNATIONS OF
DOUGLAS BROWN**

<u>From</u>		<u>To</u>		<u>Objecting Party</u>	<u>Objection</u>	<u>Ruling</u>
<u>Page</u>	<u>Line</u>	<u>Page</u>	<u>Line</u>			
32	11	32	14	BP	FRE 602; Vague	
37	4	40	12	Transocean	Hearsay. (FED. R. EVID. 802).	
38	22	39	2	BP	relevance; Vague	
53	23	54	13	BP	Hearsay	
55	1	55	6	BP	Hearsay	
55	7	55	11	BP	FRE 602; Vague	
55	20	56	7	BP	Hearsay	
56	18	57	4	BP	Hearsay	
56	18	57	17	Transocean	Hearsay; calls for speculation; lacks foundation. (FED. R. EVID. 602, 802).	
57	5	57	7	BP	FRE 602	
58	6	58	13	BP	FRE 602	
65	20	65	23	BP	Misstates the Record	
133	23	134	9	Transocean	Hearsay. (FED. R. EVID. 802).	
145	12	149	4	Transocean	Calls for speculation; calls for improper lay opinion; lacks sufficient foundation; hearsay. (FED. R. EVID. 602, 802).	

149	5	150	3	Transocean	Lacks foundation; calls for speculation; calls for improper lay opinion. (FED. R. EVID. 602).	
151	8	152	13	Transocean	Lacks foundation; calls for speculation; calls for improper lay opinion. (FED. R. EVID. 602).	
153	22	154	20	Transocean	Calls for improper lay opinion; calls for speculation; hearsay. (FED. R. EVID. 602, 802).	
155	6	157	4	Transocean	Calls for speculation; calls for imperp lay opinion; hearsay.(FED. R. EVID. 602).	
159	10	160	15	Transocean	Lacks foundation; calls for speculation; calls for improper lay opinion. (FED. R. EVID. 602).	
169	8	169	14	Transocean	Lacks foundation; calls for speculation; calls for improper lay opinion. (FED. R. EVID. 602).	
171	15	172	22	Transocean	Lacks foundation; calls for speculation; calls for improper lay opinion; and contains hearsay. (FED. R. EVID. 602, 802).	
172	23	174	23	Transocean	Hearsay. (FED. R. EVID. 802).	
182	24	184	2	Transocean	Calls for speculation; calls for improper lay opinion. (FED. R. EVID. 602).	
185	6	185	12	BP	Inadmissible by Statute	
186	4	186	23	BP	Inadmissible by Statute	
187	2	187	4	BP	Inadmissible by Statute	
187	25	188	20	BP	Inadmissible by Statute	
197	15	198	5	Transocean	Calls for speculation; calls for improper lay opinion. (FED. R. EVID. 602).	
198	16	204	9	Transocean	Lacks foundation; calls for speculation; calls for improper lay opinion. (FED. R. EVID. 602).	

204	12	208	3	Transocean	Lacks foundation; calls for speculation; calls for improper lay opinion; hearsay; cites inadmissible unsworn testimony. (FED. R. EVID. 602, 802).	
210	20	211	3	Transocean	Calls for speculation. (FED. R. EVID. 602).	
220	22	221	21	BP	Inadmissible by Statute	
220	22	222	4	Transocean	Lacks foundation; calls for speculation; calls for improper lay opinion; call for inadmissible MBI testimony. (46 U.S.C. Sec. 6308, FED. R. EVID. 602).	
221	25	222	1	BP	Inadmissible by Statute	
223	18	223	25	Transocean	Lacks foundation; calls for speculation; calls for improper lay opinion. (FED. R. EVID. 602).	
224	20	226	2	Transocean	Lacks foundation; calls for speculation. (FED. R. EVID. 602).	
240	2	244	11	Transocean	Lacks foundation; calls for speculation; hearsay; calls for improper lay opinion. (FED. R. EVID. 602).	
248	6	248	23	BP	Hearsay; FRE 602	
260	6	260	16	BP	Hearsay; FRE 602	
260	19	261	1	BP	Hearsay; FRE 602	
260	6	262	11	Transocean	Hearsay; calls for speculation; lacks foundation. (FED. R. EVID. 602, 802).	
261	4	262	11	BP	FRE 602; Hearsay	
266	16	266	22	BP	FRE 602; Vague; Misstates the Record	
271	15	271	21	BP	FRE 602; Vague	
295	25	296	2	BP	FRE 602; Vague	