

**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

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**ALL PARTIES OBJECTIONS TO DEPOSITION DESIGNATIONS OF  
MICHAEL BYRD**

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					<u>Objection</u>	<u>Ruling</u>
<u>Page</u>	<u>Line</u>	<u>Page</u>	<u>Line</u>			
35	2	35	3	BP	FRE 602	
35	5	35	6	BP	FRE 602	
39	7	39	9	BP	FRE 602	
39	10	39	10	BP	FRE 602	
42	7	42	12	BP	FRE 602	
42	14	42	14	BP	FRE 602	
45	1	45	4	BP	vague; misstates the record; FRE 602	
45	6	45	8	BP	vague; misstates the record; FRE 602	
51	5	51	7	BP	FRE 602	
51	24	52	1	BP	FRE 602	
52	3	52	11	BP	FRE 602	
52	12	52	20	BP	FRE 602	
52	23	53	14	BP	FRE 602	
53	17	53	22	BP	FRE 602	

					Non-responsive: The witness was asked if BP does anything to figure out whether API 17 is complied with. The witness initially responded "Not that I'm aware of," then added non-responsively that BP relies on TO and Cameron. HESI objects to the portion of the answer lines 17-18 as non-responsive to the question posed.	
66	13	66	22	HESI		
149	21	149	24	BP	vague; FRE 602	
150	2	150	2	BP	vague; FRE 602	
151	3	151	9	Cameron	Responsiveness	
					Non-responsive: The witness was asked if "BP does not know how those [DWH BOP] components will work under dynamic flow conditions." The witness responded that there were no indications from TO or Cameron that he BOP would not work. This entire answer is non-responsive to the question posed.	
151	3	151	10	HESI		
159	24	160	7	BP	FRE 602	
167	24	168	1	BP	vague	
168	3	168	6	BP	vague	
168	7	168	12	BP	vague; asked and answered; argumentative	
168	14	168	14	BP	vague; asked and answered; argumentative	
169	5	169	8	BP	vague; asked and answered	
179	11	180	2	BP	FRE 602	
180	9	180	16	BP	FRE 602	
186	3	186	13	Transocean	Nonresponsive answer.	
187	2	187	9	BP	argumentative; FRE 602; misstates the record	
187	11	187	11	BP	argumentative; misstates the record; FRE 602	
190	2	190	4	BP	vague; asked and answered; argumentative	

190	6	190	9	BP	vague; asked and answered; argumentative	
190	16	190	18	BP	asked and answered; argumentative	
193	25	194	10	Cameron	Responsiveness	
193	25	194	10	Transocean	Nonresponsive answer.	
200	14	200	16	BP	vague	
200	19	201	6	BP	vague	
201	24	202	2	BP	hearsay	
203	6	203	9	BP	misstates the record; vague	
203	11	203	12	BP	misstates the record; vague	
213	25	214	2	BP	asked and answered; argumentative	
214	4	214	5	BP	asked and answered; argumentative	
214	7	214	8	BP	asked and answered; argumentative	
214	10	214	11	BP	argumentative; asked and answered; relevance	
214	18	214	20	BP	asked; argumentative; vague	
214	22	214	24	BP	asked and answered; argumentative; vague	
214	18	214	24	Transocean	Nonresponsive answer.	
215	7	215	13	BP	asked and answered; argumentative; vague	
215	15	215	17	BP	asked and answered; argumentative; vague	
215	7, at "You're"	215	17	Cameron	Responsiveness	
222	1	222	2	BP	relevance; vague	
222	4	222	4	BP	relevance; vague	
229	18	229	22	BP	vague;	
229	24	229	25	BP	vague	
231	6	231	15	Cameron	Responsiveness	

					Non-responsive: The witness was asked if he had any discussion with anyone from BP as to why rechargeable batteries were not used in the DWH BOP. The witness responded "No," then added non-responsively that BP relies on TO and Cameron on what was the best way to accomplish the functional requirements with the BOP. HESI objects to the portion of the answer after "No" in line 10 as non-responsive to the question posed.	
231	6	231	19	HESI		
233	20	233	22	BP	FRE 602	
233	24	234	2	BP	FRE 602	
258	14	258	16	BP	FRE 602	
258	18	258	18	BP	FRE 602	
270	8	270	13	BP	vague;	
270	15	270	17	BP	vague	
270	19	270	20	BP	vague	
279	12	280	7	Cameron	Responsiveness	
281	11	281	17	Cameron	Speculation; Responsiveness	
306	23	307	2	BP	FRE 602; vague	
307	4	307	5	BP	FRE 602; vague	
308	9	308	22	Cameron	Speculation	
314	24	315	5	BP	FRE 602	
318	21	319	1	BP	FRE 602	
319	7	319	10	BP	FRE 602	
319	13	319	14	BP	FRE 602	
320	24	321	4	Transocean	Speculation; Lacks foundation (Fed.R.Evid.602).	
321	20	321	24	BP	FRE 602	

321	5	321	19	HESI	Non-responsive: The witness was asked if BP undertook any efforts to ensure that the batteries on the blue and yellow control pods were adequately charged before the BOP was set on the Macondo well. The witness responded "I can't say specifically," then added non-responsively that BP relies on TO to maintain the equipment. HESI objects to the portion of the answer after "I can't say specifically" in line 12 as non-responsive to the question posed.	
321	5	321	16	Transocean	Nonresponsive answer.	
323	13	323	15	BP	misstates the record; vague; FRE 602	
323	17	323	17	BP	vague; misstates the record; FRE 602	
327	9	327	14	BP	vague; misstates the record; FRE 602	
327	16	327	16	BP	vague; misstates the record; FRE 602	
328	14	328	18	BP	calls for a legal conclusion; FRE 602	
328	23	328	25	BP	assumes facts	
329	2	329	2	BP	assumes facts	
330	19	330	22	BP	misstates the record; vague; FRE 602	
330	24	331	1	BP	vague; misstates the record; FRE 602	
334	2	334	8	BP	FRE 602; misstates the record	
334	21	334	24	BP	FRE 602	
335	1	335	5	BP	FRE 602	
347	6	347	8	BP	vague; FRE 602	
347	10	347	15	BP	vague; FRE 602	
347	17	347	19	BP	vague; FRE 602	
350	3	350	9	BP	FRE 602	
350	11	350	14	BP	FRE 602	
354	14	354	17	BP	legal conclusion; FRE 602	
363	23	364	1	BP	FRE 602	

364	2	364	3	BP	FRE 602	
364	5	364	6	BP	FRE 602	
364	25	365	4	BP	FRE 602	
366	11	366	14	BP	vague; FRE 602	
366	16	366	16	BP	FRE 602; vague	
405	1	405	4	BP	FRE 602	
405	6	405	6	BP	FRE 602	
415	15	415	20	BP	FRE 602; vague	
436	1	436	5	BP	misstates the record	
436	7	436	12	BP	misstates the record	
436	15	436	21	BP	misstates the record	
449	20	450	5	Cameron	Speculation; Responsiveness	
450	13	451	7	BP	relevance	
451	20	451	22	BP	vague; FRE 602	
451	24	452	1	BP	FRE 602; vague	
453	15	453	20	BP	FRE 602; vague	
453	22	453	23	BP	FRE 602; vague	
455	9	455	11	BP	FRE 602; vague	
455	13	455	15	BP	FRE 602; vague	
462	1	462	3	BP	vague;	
462	5	462	7	BP	vague	
463	6	463	9	BP	misstates the record	
463	11	463	12	BP	misstates the record	
464	8	464	14	BP	misstates the record; vague	
464	16	464	16	BP	misstates the record; vague	
466	3	466	6	BP	misstates the record; argumentative	
466	8	466	11	BP	misstates the record; argumentative	
466	23	467	4	BP	FRE 602	
467	6	467	6	BP	FRE 602	
468	20	468	23	BP	FRE 602; vague	
468	25	468	25	BP	FRE 602; vague	
469	14	469	19	BP	FRE 602; vague	
469	21	469	21	BP	FRE 602; vague	
470	4	470	5	BP	FRE 602; relevance	
470	7	470	8	BP	FRE 602; relevance	
470	11	470	15	BP	relevance	
472	5	475	5	BP	relevance	

474	23	475	5	BP	relevance; FRE 602	
475	7	475	18	BP	relevance	
475	19	475	24	BP	FRE 602	
476	8	476	9	BP	FRE 602	
479	1	479	4	BP	FRE 602	
481	2	481	4	BP	FRE 602; argumentative; vague	
481	6	481	12	BP	FRE 602	
482	13	482	18	BP	relevance; FRE 602	
482	20	482	22	BP	relevance; FRE 602	
491	3	491	4	BP	FRE 602	
491	6	491	11	BP	FRE 602	
491	13	492	2	BP	FRE 602	
492	17	492	19	BP	FRE 602	
492	21	492	21	BP	FRE 602	
493	6	493	9	BP	FRE 602	
493	11	493	16	BP	FRE 602	
493	20	493	24	BP	FRE 602; vague; misstates the record	
494	1	494	1	BP	FRE 602; vague; misstates the record	
496	18	496	23	BP	FRE 602; vague; misstates the record	
496	25	496	25	BP	FRE 602; vague; misstates the record	
498	20	498	24	BP	misstates the record; vague	
499	1	499	2	BP	misstates the record; vague	
501	1	501	4	BP	vague; misstates the record	
501	6	501	10	BP	vague; misstates the record	
501	11	501	16	BP	vague; misstates the record	
501	18	501	19	BP	vague; misstates the record	
502	13	502	16	BP	vague; misstates the record; FRE 602	
502	18	502	20	BP	vague; misstates the record; FRE 602	
505	18	505	23	BP	vague; misstates the record; FRE 602	
505	25	506	4	BP	vague; misstates the record; FRE 602	
511	15	511	16	BP	FRE 602; misstates the record; vague	

511	18	511	20	BP	FRE 602; misstates the record; vague	
517	9	517	12	BP	FRE 602; assumes facts not in evidence	
517	14	517	15	BP	FRE 602; assumes facts not in evidence	
523	17	523	20	BP	FRE 602	
523	22	524	7	BP	FRE 602	
541	2	541	11	Cameron	Speculation	
550	16	551	9	Cameron	Speculation; No Foundation	
554	25	555	2	BP	FRE 602	
555	19	555	20	BP	FRE 602; vague	
555	22	555	22	BP	FRE 602; vague	
563	12	563	16	BP	FRE 602	
563	18	563	22	BP	FRE 602	
563	24	564	5	BP	FRE 602	
564	7	564	11	BP	FRE 602	
564	13	564	20	BP	FRE 602	
571	4	571	8	BP	misstates the record	
578	4	578	10	BP	misstates the record	
578	12	578	14	BP	misstates the record	
583	9	583	13	BP	misstates the record; FRE 602	
583	15	583	16	BP	misstates the record; FRE 602	
584	2	585	6	BP	FRE 602	
590	5	590	9	BP	FRE 602; misstates the record	
590	11	590	12	BP	FRE 602; misstates the record	
590	13	590	22	BP	FRE 602; misstates the record	
590	24	591	1	BP	FRE 602; misstates the record	
596	16	596	23	BP	relevance	
596	24	596	25	BP	relevance; 602;	
597	2	597	8	BP	relevance; 602	
599	12	599	15	BP	FRE 602	
608	1	608	4	BP	FRE 602; misstates the record	
608	6	608	7	BP	FRE 602; misstates the record	
615	14	615	16	BP	argumentative	
615	18	615	24	BP	argumentative; FRE 602	
632	10	632	11	BP	FRE 602	
633	4	633	6	BP	FRE 602	
633	8	633	9	BP	FRE 602	



634	5	634	7	BP	FRE 602; misstates the record	
634	9	634	10	BP	FRE 602; misstates the record	
636	12	636	15	BP	FRE 602; misstates the record	
636	19	636	19	BP	FRE 602; misstates the record	
638	12	638	18	BP	argumentative; misstates the record	
638	20	638	23	BP	argumentative; misstates the record	
638	25	639	2	BP	argumentative; misstates the record	
639	6	639	12	BP	misstates the record; argumentative	
639	14	639	17	BP	misstates the record; argumentative	