

**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  
JAMES DUPREE**

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<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>			
29	16	29	18	BP	Misstates the Record; Colloquy	
34	19	34	21	BP	Colloquy	
35	3	35	5	BP	Relevance; Fragment	
60	7	60	8	BP	Fragment	
66	16	66	22	BP	FRE 602	
66	23	67	6	BP	FRE 602; Vague	
72	14	72	24	BP	Colloquy	
78	2	78	7	BP	FRE 602	
78	23	79	7	BP	Vague	
80	5	80	17	M-I		
82	5	82	8	BP	Vague; FRE 602	
82	19	82	23	BP	Vague; FRE 602	
89	2	89	18	BP	Not Relevant to Phasse I	
89	23	97	17	BP	Not Relevant to Phasse I	
97	22	98	12	BP	Not Relevant to Phasse I	
98	20	99	10	BP	Not Relevant to Phasse I	
99	24	101	7	BP	Not Relevant to Phasse I	
101	17	102	2	BP	Not Relevant to Phasse I	
102	16	104	11	BP	Not Relevant to Phasse I	
110	24	111	6	BP	Colloquy	
112	12	112	16	BP	Colloquy	
113	2	113	25	BP	Not Relevant to Phase I; Fragment	

114	25	114	25	BP	Fragment	
115	25	115	25	BP	Fragment	
116	1	117	2	BP	Not Relevant to Phase I	
119	10	119	24	M-I		
120	5	121	3	M-I		
138	4	138	16	BP	FRE 602	
150	1	150	10	HESI	Assumes facts not in evidence; counsel improperly testifying to facts; argumentative; lack of foundation: Immediately prior to this question, counsel asked about BP's response to the blowout having been to seek third party independent testing of cement slurries. He then stated that the reason for this is that BP acknowledges that "the cement slurry was part of the problem of the blowout in the first place." There is no evidence that the slurry was "part of the problem of the blowout in the first place," and therefore the question assumes facts not in evidence, is argumentative, and rests upon a lack of foundation. Further, counsel is improperly testifying to facts that are not in evidence.	
158	8	158	17	BP	Not Relevant to Phase I	
161	19	162	8	BP	Not Relevant to Phase I	
162	18	163	4	BP	Not Relevant to Phase I	
169	21	174	17	BP	Not Relevant to Phase I	
175	15	175	18	BP	Not Relevant to Phase I	
176	9	182	13	BP	Not Relevant to Phase I	
184	3	203	1	BP	Not Relevant to Phase I	
203	25	205	8	BP	Not Relevant to Phase I	
205	19	209	19	BP	Not Relevant to Phase I	
220	23	222	9	BP	Not Relevant to Phase I	
224	10	224	10	BP	Not Relevant to Phase I	
225	5	249	2	BP	Not Relevant to Phase I	
253	4	254	2	BP	Not Relevant to Phase I	
257	24	258	1	BP	FRE 602	
267	15	267	22	BP	FRE 602	

269	25	270	14	BP	FRE 602; Hearsay	
270	23	271	14	BP	FRE 602	
271	18	272	2	BP	FRE 602	
272	22	273	6	BP	FRE 602	
273	19	274	12	BP	FRE 602	
274	24	275	9	BP	FRE 602	
276	3	276	11	BP	FRE 602; Fragment	
277	11	278	1	BP	FRE 602	
281	9	282	13	BP	FRE 602	
295	7	295	13	BP	Evidence/Testimony does not meet the "substantially similar incident" doctrine	
295	21	297	25	BP	Evidence/Testimony does not meet the "substantially similar incident" doctrine	
314	5	314	14	BP	Colloquy	
315	16	316	5	BP	Colloquy; Vague	
351	20	353	10	BP	Not Relevant to Phase I	
369	6	369	18	BP	Not Relevant to Phase I	
371	1	371	25	BP	Not Relevant to Phase I	
372	7	373	6	BP	Not Relevant to Phase I	
373	20	379	7	BP	Not Relevant to Phase I	
389	15	391	1	BP	FRE 602; Relevance; Prejudice	
400	13	400	19	BP	Vague	
407	4	408	16	BP	Hearsay; FRE 602	
420	12	421	16	BP	Cumulative	
432	17	432	25	BP	FRE 602	
445	25	447	7	BP	Cumulative	
452	12	452	22	BP	Colloquy	
459	4	459	7	BP	Asked and Answered	
470	11	470	19	BP	Assumes facts not in evidence; FRE 602	
495	3	495	21	BP	FRE 602; Hearsay	
508	12	510	8	BP	FRE 602; Assumes Facts Not in Evidence	
530	9	530	14	BP	FRE 602	
555	9	555	10	BP	FRE 602	
555	18	557	12	BP	FRE 602	
563	13	565	11	BP	FRE 602	
574	20	575	3	BP	FRE 602	

581	22	582	2	BP	Hearsay; FRE 602	
588	11	589	3	BP	FRE 602	
594	12	594	20	BP	FRE 602	
595	12	595	16	BP	FRE 602	
607	22	608	1	BP	Colloquy	
607	22	608	15	BP	FRE 602; Misstates the Record	
609	11	610	4	BP	FRE 602; cumulative	
610	5	610	10	BP	Colloquy	
614	8	614	9	BP	Colloquy	
614	24	616	7	BP	FRE 602	
618	5	620	11	BP	FRE 602; Improper use of testimony; Colloquy	
624	18	625	24	BP	Colloquy	
628	1	628	9	BP	Argumentative	
629	2	633	10	BP	Not Relevant to Phase I	
634	12	642	16	BP	Not Relevant to Phase I; Colloquy; FRE 602	
643	11	646	10	BP	Not Relevant to Phase I	