

HESI's Objections to the Deposition Designations of Greg Garrison

GLOBAL OBJECTION:

| Page:Line | Objection |
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| 19:14-20:21; 21:22-22:8; 23:15-25:3; 27:9-19; 28:7-29:7; 32:8-19; 34:11-18; 35:10-19; 59:7-60:9; 60:21-66:12; 73:7-12; 107:9-23; 114:18-23; 149:22-150:10; 152:5-153:2; 154:11-155:15; 158:14-160:13; 268:18-269:8 | FRE 401 and 402; pending motion in limine: HESI recently filed a Motion in Limine that seeks to exclude evidence of all tests conducted on anything other than rig samples. On this basis, HESI objects to portions of Garrison's deposition testimony that discuss testing of any lab stock samples as irrelevant under FRE 401 and inadmissible under FRE 402. However, out of an abundance of caution, and in the event any testimony is allowed, HESI has designated testimony regarding certain tests conducted on lab stock samples to provide appropriate context about such tests. Therefore, some of the page/line objections noted herein may pertain to testimony designated by HESI, in addition to testimony designated by other parties. HESI reserves the right to withdraw its designations on this topic in the event its Motion in Limine is granted. |

