

**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
GRAHAM VINSON**

VOLUME 1:

<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>			
15	5	15	8	BP	Vague; FRE 602	
17	11	17	15	BP	Vague; FRE 602	
19	7	19	10	BP	Vague; FRE 602	
21	12	21	15	BP	Misstates the Record	
21	17	21	18	BP	Misstates the Record	
23	7	23	9	BP	Hearsay; FRE 602	
23	11	23	12	BP	Hearsay; FRE 602	
23	17	23	21	BP	Misstates the Record; FRE 602	
23	23	23	24	BP	Misstates the Record; FRE 602	
29	20	29	22	BP	Vague	
30	22	31	14	BP	FRE 602	
33	14	33	16	BP	FRE 602	
37	17	37	23	Anadarko	Improper opinion/Calls for legal conclusion; Vague	
44	22	45	10	BP	Vague; FRE 602	
45	12	45	12	BP	Vague	
45	14	46	2	BP	FRE 602	
46	12	46	19	BP	Vague; FRE 602	
46	21	46	22	BP	Vague; FRE 602	
47	18	48	9	BP	FRE 602	
54	12	54	17	BP	Misstates the Record; FRE 602	
54	19	54	19	BP	Misstates the Record; FRE 602	

55	13	55	21	BP	Misstates the Record; Compound; Argumentative; FRE 602	
63	16	63	21	BP	FRE 602	
67	7	67	10	BP	Vague; Misstates the Record; FRE 602	
68	4	68	11	BP	Misstates the Record; FRE 602	
72	18	73	2	BP	Vague; FRE 602	
73	16	73	23	Anadarko	Improper opinion/Calls for legal conclusion; Vague; Prejudicial/confusing/cumulative	
83	24	84	3	BP	Vague	
86	9	86	16	BP	Misstates the Record; FRE 602	
88	5	88	8	BP	Vague	
89	15	90	14	BP	Hearsay	
91	6	91	9	BP	Vague; Misstates the Record	
91	20	91	24	BP	FRE 602	
92	1	92	3	BP	Vague	
92	6	92	10	BP	Vague; FRE 602	
92	12	92	20	BP	FRE 602	
92	25	93	11	Anadarko	Improper opinion/Calls for legal conclusion; Nonresponsive; Vague	
95	4	95	7	BP	Misstates the Record; FRE 602	
104	19	104	25	BP	Vague; FRE 602	
110	21	111	17	BP	Colloquy; Vague	
115	15	115	21	BP	FRE 602	
117	17	118	2	Cameron	Hearsay; Foundation; No Personal Knowledge (FRE 602; 402; 802)	
118	3	119	9	Cameron	Relevance; Foundation; No Personal Knowledge or Expertise to Opine on BOP (FRE 802; 602; 402)	
120	3	120	9	BP	Misstates the Record	
120	18	120	22	BP	Vague; FRE 602	
121	7	121	9	BP	Assumes Facts Not in Evidence	
123	9	123	21	BP	FRE 602	
124	2	124	4	Cameron	Mischaracterizes Bly Report; Calls for Speculation by Witness (FRE 602; 802; 402)	
128	3	128	15	BP	FRE 602	
130	9	130	19	BP	FRE 602	
131	11	131	17	BP	FRE 602	
155	22	156	7	BP	FRE 602	

158	4	158	22	BP	FRE 602	
166	7	167	9	BP	FRE 602	
185	22	186	8	BP	FRE 602	
189	19	190	13	BP	Phase	
190	14	190	19	BP	Phase; Ambiguous; FRE 602	
190	21	191	4	BP	Phase; Ambiguous; FRE 602	
197	11	197	15	BP	Assumes Facts Not in Evidence	
197	17	197	25	BP	Assumes Facts Not in Evidence	
198	1	198	3	BP	Ambiguous	
198	5	198	6	BP	Ambiguous	
202	15	202	17	BP	Ambiguous	
202	19	202	25	BP	Ambiguous	
204	6	204	7	BP	Compound; Ambiguous	
204	9	204	9	BP	Compound; Ambiguous	
204	22	205	4	BP	FRE 701; FRE 602	
207	12	207	12	BP	Incomplete; Failed to highlight entire question	
207	12	207	17	BP	Colloquy; FRE 602	
207	24	208	1	BP	Ambiguous	
208	3	208	5	BP	Ambiguous	
209	3	209	9	BP	Ambiguous; Vague	
209	11	209	13	BP	Ambiguous; Vague	
211	25	212	8	BP	Assumes Facts Not in Evidence; Vague	
212	10	212	11	BP	Assumes Facts Not in Evidence; Vague	
212	13	212	16	BP	Assumes Facts Not in Evidence; Vague	
213	10	213	12	BP	Vague; Compound	
213	14	213	15	BP	Vague; Compound	
217	18	218	3	BP	Vague; Compound	
218	5	218	8	BP	Vague; Compound	
219	3	219	7	BP	FRE 602	
219	9	220	1	BP	FRE 602	
220	2	220	3	BP	Misstates the Record	
220	5	220	7	BP	Misstates the Record	
220	23	220	24	BP	Assumes Facts Not in Evidence	
221	1	221	5	BP	Assumes Facts Not in Evidence	
221	22	221	24	BP	FRE 602; Incomplete - failed to designate entire question	
222	3	222	7	BP	FRE 602; Incomplete - failed to	

					designate entire question	
224	4	224	5	BP	FRE 602	
224	7	224	13	BP	FRE 602	
224	14	224	15	BP	Misstates the Record; Ambiguous	
224	17	224	19	BP	Misstates the Record; Ambiguous	
224	20	224	22	BP	Misstates the Record; Compound	
224	24	224	24	BP	Misstates the Record; Compound	
224	25	225	4	BP	FRE 602; Vague	
225	6	225	12	BP	FRE 602; Vague	
226	12	226	13	BP	Misstates the Record; Assumes Facts Not in Evidence	
226	15	226	15	BP	Misstates the Record; Assumes Facts Not in Evidence	
238	12	238	13	BP	Compound	
238	16	238	18	BP	Compound	
239	9	239	15	BP	Compound; Ambiguous; Assumes Facts Not in Evidence	
239	17	239	20	BP	Compound; Ambiguous; Assumes Facts Not in Evidence	
240	4	240	7	BP	Compound; Ambiguous; Assumes Facts Not in Evidence	
240	9	240	12	BP	Compound; Ambiguous; Assumes Facts Not in Evidence	
240	20	240	22	BP	Ambiguous	
240	24	241	2	BP	Ambiguous	
241	17	241	20	BP	Incomplete - did not designate complete answer	
243	24	244	3	BP	Colloquy; Assumes Facts Not in Evidence	
244	5	244	6	BP	Colloquy; Assumes Facts Not in Evidence	
245	15	245	18	BP	Compound	
245	20	245	25	BP	Compound	
248	1	248	5	BP	Compound; Assumes Facts Not in Evidence	
248	7	248	10	BP	Compound; Assumes Facts Not in Evidence	
248	12	248	12	BP	Compound; Assumes Facts Not in Evidence	
248	14	248	21	BP	Vague	
248	23	248	25	BP	Vague	
249	24	250	3	BP	Vague	
250	5	250	13	BP	Vague	

251	9	251	13	BP	Colloquy; Compound	
251	15	251	23	BP	Misstates the Record; Compound; Vague	
251	25	252	1	BP	Misstates the Record; Compound; Vague	
252	3	252	11	BP	Misstates the Record; Compound; Vague	
254	22	254	23	BP	Incomplete - did not designate complete question; Compound	
254	25	255	3	BP	Incomplete; Compound	
255	23	255	25	BP	Vague; FRE 602	
256	2	256	2	BP	Vague; FRE 602	
258	18	258	24	BP	Compound; Colloquy	
259	1	259	7	BP	Compound; Colloquy	
259	12	259	14	BP	Vague	
259	16	259	17	BP	Vague	
259	18	259	23	BP	Vague; Compound	
259	25	260	5	BP	Vague; Compound	
260	6	260	8	BP	Vague	
260	12	260	13	BP	Vague	
260	14	260	15	BP	Vague	
260	17	260	20	BP	Vague	
261	2	261	5	BP	Colloquy	
261	7	261	15	BP	FRE 602	
261	17	261	22	BP	FRE 602	
261	25	262	1	BP	FRE 602; Misstates the Record	
262	2	262	4	BP	FRE 602; Misstates the Record	
262	6	262	7	BP	FRE 602; Misstates the Record	
262	8	262	12	BP	FRE 602; Misstates the Record	
262	14	262	14	BP	FRE 602; Misstates the Record	
262	16	262	23	BP	FRE 602; Misstates the Record	
262	24	263	1	BP	FRE 602; Misstates the Record	
263	6	263	19	BP	FRE 602; Colloquy; Misstates the Record	
263	21	263	23	BP	FRE 602; Misstates the Record; Colloquy	
263	24	264	3	BP	FRE 602; Compound; Misstates the Record	
264	5	264	5	BP	FRE 602; Compound; Misstates the Record	
264	6	264	8	BP	FRE 602	
264	10	264	10	BP	FRE 602	

264	23	265	5	BP	FRE 602	
265	7	265	16	BP	FRE 602	
266	8	266	14	BP	FRE 701; FRE 602	
266	16	266	25	BP	FRE 701; FRE 602	
267	3	267	7	BP	FRE 701; FRE 602	
267	9	267	12	BP	FRE 701; FRE 602	
267	13	267	21	BP	FRE 602; Misstates the Record	
267	23	268	11	BP	FRE 602; Misstates the Record	
268	23	269	1	BP	Ambiguous; Compound	
269	3	269	8	BP	Ambiguous; Compound	
269	18	269	19	BP	FRE 602	
269	21	269	24	BP	FRE 602	
269	25	270	1	BP	FRE 701; FRE 602; Vague	
270	3	270	7	BP	FRE 701; FRE 602; Vague	
270	20	270	23	BP	FRE 602	
270	24	271	7	BP	FRE 602	
271	13	271	14	BP	Argumentative; Misstates the Record; Assumes Facts Not in Evidence	
271	16	272	2	BP	Argumentative; Misstates the Record; Assumes Facts Not in Evidence	
272	3	272	9	BP	FRE 602	
272	11	272	11	BP	FRE 602	
272	13	272	23	BP	FRE 602	
272	24	273	3	BP	FRE 602; Misstates the Record; Argumentative	
273	5	273	14	BP	FRE 602; Misstates the Record; Argumentative	
273	15	273	22	BP	FRE 701; FRE 602	
273	24	273	25	BP	FRE 701; FRE 602	
274	2	274	5	BP	FRE 701; FRE 602	
274	6	274	10	BP	FRE 602; Misstates the Record	
274	12	274	17	BP	FRE 602; Misstates the Record	
274	18	274	20	BP	Colloquy; Vague; FRE 602	
274	22	274	24	BP	Colloquy; Vague; FRE 602	
274	25	275	3	BP	FRE 602	
275	5	275	13	BP	FRE 602	
276	25	277	3	BP	Ambiguous	
277	5	277	5	BP	Ambiguous	
277	16	277	18	BP	FRE 602; Incomplete - failed to	

					designate entire answer	
277	21	277	25	BP	FRE 602; Incomplete - failed to designate entire answer	
278	2	278	5	BP	FRE 602; Misstates the Record	
278	7	278	11	BP	FRE 602; Misstates the Record	
286	13	286	15	BP	Argumentative; Assumes Facts Not in Evidence	
286	16	286	16	BP	Argumentative; Assumes Facts Not in Evidence	
286	18	286	18	BP	Argumentative; Assumes Facts Not in Evidence	
296	24	297	12	BP	FRE 701; FRE 602	
299	4	299	9	BP	Misstates the Record; Ambiguous	
299	11	299	13	BP	Misstates the Record; Ambiguous	
301	8	301	11	BP	Ambiguous	
301	13	301	14	BP	Ambiguous	
301	15	301	20	BP	Compound	
301	22	301	22	BP	Compound	
304	1	304	7	BP	Misstates the Record; Vague	
304	9	304	16	BP	Misstates the Record; Vague	
306	10	306	16	BP	Compound; Ambiguous	
306	18	306	23	BP	Compound; Ambiguous	
307	13	307	20	BP	FRE 701; FRE 602	
307	22	307	23	BP	FRE 701; FRE 602	
307	25	308	6	BP	FRE 701; FRE 602	
308	16	308	20	BP	Compound	
308	22	309	1	BP	Compound	
309	3	309	5	BP	Compound	
309	21	310	2	BP	Vague	
310	4	310	7	BP	Vague	
310	12	310	15	BP	Ambiguous	
310	17	310	18	BP	Ambiguous	
311	3	311	7	BP	Assumes Facts Not in Evidence; FRE 602	
311	9	311	21	BP	Assumes Facts Not in Evidence; FRE 602	
312	12	312	20	BP	Colloquy; Ambiguous; FRE 602	
312	22	312	23	BP	Colloquy; Ambiguous; FRE 602	
312	24	313	1	BP	Ambiguous; FRE 602	
313	3	313	9	BP	Ambiguous; FRE 602	
316	25	317	5	BP	Ambiguous	

317	7	317	7	BP	Ambiguous	
317	14	317	17	BP	Ambiguous; Colloquy	
317	19	317	25	BP	Ambiguous; Vague	
318	1	318	4	BP	Misstates the Record; Argumentative	
318	6	318	9	BP	Misstates the Record; Argumentative	
318	10	318	18	BP	Compound; Ambiguous; Asked and Answered	
318	20	318	24	BP	Misstates the Record	
319	1	319	2	BP	Misstates the Record	
319	3	319	8	BP	Compound; Ambiguous; Asked and Answered; Misstates the Record	
319	10	319	14	BP	Compound; Ambiguous; Asked and Answered; Misstates the Record	
319	15	319	20	BP	Misstates the Record; Assumes Facts Not in Evidence	
319	22	320	1	BP	Misstates the Record; Assumes Facts Not in Evidence	
320	2	320	4	BP	FRE 701; FRE 602; Vague; Assumes Facts Not in Evidence	
320	6	320	10	BP	FRE 701; FRE 602; Vague; Assumes Facts Not in Evidence	
320	11	320	12	BP	Vague; Assumes Facts Not in Evidence	
320	14	320	15	BP	Vague; Assumes Facts Not in Evidence	
320	16	320	17	BP	Asked and Answered; Vague; Assumes Facts Not in Evidence	
320	19	320	19	BP	Asked and Answered; Vague; Assumes Facts Not in Evidence	
320	20	320	23	BP	Vague; Assumes Facts Not in Evidence	
320	25	320	25	BP	Vague; Assumes Facts Not in Evidence	
321	1	321	4	BP	Vague; Assumes Facts Not in Evidence	
321	6	321	6	BP	Vague; Assumes Facts Not in Evidence	
321	7	321	10	BP	Misstates the Record	
321	21	322	2	BP	Assumes Facts Not in Evidence; Ambiguous	
322	4	322	9	BP	Assumes Facts Not in Evidence;	

					Ambiguous	
322	11	322	13	BP	Assumes Facts Not in Evidence; Ambiguous	
322	15	322	18	BP	Assumes Facts Not in Evidence; Ambiguous	
328	8	328	10	BP	Vague	
328	12	328	15	BP	Vague	
336	11	336	21	BP	Asked and Answered; FRE 602	
336	22	336	25	BP	FRE 602; Argumentative	
337	2	337	3	BP	FRE 602; Argumentative	
337	2	337	25	BP	FRE 602	
338	7	338	22	BP	FRE 602	
339	5	339	25	BP	FRE 602	
344	18	345	1	BP	FRE 602	
345	20	346	2	BP	FRE 602	
346	22	347	4	BP	FRE 602	
347	5	347	12	BP	FRE 602	
347	17	347	19	BP	Misstates the Record; Argumentative; FRE 602	
348	8	348	15	BP	Assumes Facts Not in Evidence; FRE 602	
348	24	349	8	BP	Assumes Facts Not in Evidence; Misstates the Record; FRE 602	
349	9	349	22	BP	Vague; Misstates the Record; FRE 602	
350	6	351	4	BP	Misstates the Record; FRE 602	
351	5	351	9	BP	Misstates the Record; FRE 602	
351	14	351	21	BP	Misstates the Record; FRE 602	
351	22	352	7	BP	Misstates the Record; FRE 602	
353	18	354	1	BP	Misstates the Record; Vague	
355	13	355	17	BP	Misstates the Record	
362	19	363	10	BP	Misstates the Record; Vague	
363	20	364	2	BP	Misstates the Record; Vague; FRE 602	
364	12	364	20	BP	Misstates the Record; Vague; FRE 602	
365	21	366	9	BP	Assumes Facts Not in Evidence	

VOLUME 2:

<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>			
7	11	7	16	BP	Vague	
8	3	8	11	BP	Vague	
13	9	13	19	BP	Vague	
22	25	23	2	BP	Incomplete; Question with no answer designated	
26	10	27	6	BP	FRE 602	
40	17	41	9	HESI	Improper offer-designated testimony lacks corresponding question; argumentative: The designated testimony lacks a question; therefore, it constitutes an improper offer and is merely argumentative. It is misleading to offer only the answer.	
41	10	41	15	BP	Argumentative; FRE 602	
52	17	53	10	BP	Misstates the Record; FRE 602	
54	7	54	15	BP	Misstates the Record; FRE 602	
54	21	55	1	BP	Misstates the Record; FRE 602	
55	18	55	24	BP	Misstates the Record; FRE 602	
57	19	58	17	HESI	Non-responsive; improper narrative, speculative answer: The witness was asked, "If this additional hydrocarbon zone had been discovered before the blowout on April 20th, 2010, how would the that have impacted decisions made by the TIGER Team?" The witness responded with a narrative, non-responsive answer, despite claiming he was "not aware there is an additional hydrocarbon zone...." and noting that the petrophysical evaluation was the responsibility of Galina Skripnikova. In addition to being non-responsive, his answer is speculative.	
59	3	59	9	BP	Incomplete; Answer designated without question	
59	3	59	9	HESI	Improper offer-designated testimony lacks corresponding	

					question; argumentative: The designated testimony lacks a question; therefore, it constitutes an improper offer and is merely argumentative. It is misleading to offer only the answer.	
61	7	61	24	BP	Vague; FRE 602	
68	23	69	6	BP	Vague; FRE 602	
69	7	69	11	BP	FRE 602	
78	5	78	9	BP	Vague; FRE 602	
89	20	90	1	BP	Misstates the Record; FRE 602	
95	24	97	1	BP	FRE 602	
97	12	98	2	BP	Misstates the Record; Assumes Facts Not in Evidence; FRE 602	
105	23	106	2	Anadarko	Improper opinion/Calls for legal conclusion; Lacks foundation/No personal knowledge/Calls for speculation; Prejudicial/confusing/cumulative	
106	5	106	10	Anadarko	Improper opinion/Calls for legal conclusion; Lacks foundation/No personal knowledge/Calls for speculation; Prejudicial/confusing/cumulative	
125	5	125	7	Anadarko	Lacks foundation/No personal knowledge/Calls for Speculation; Vague	
125	9	125	13	Anadarko	Improper opinion/Calls for legal conclusion; Lacks foundation/No personal knowledge/Calls for speculation; Vague	
125	16	125	17	Anadarko	Improper opinion/Calls for legal conclusion; Lacks foundation/No personal knowledge/Calls for speculation; Vague	
125	20	125	22	Anadarko	Improper opinion/Calls for legal conclusion; Lacks foundation/No personal knowledge/Calls for speculation; Vague	
125	24	126	6	Anadarko	Improper opinion/Calls for legal conclusion; Lacks foundation/No personal knowledge/Calls for speculation; Vague	
126	10	126	11	Anadarko	Improper opinion/Calls for legal conclusion; Lacks foundation/No	

					personal knowledge/Calls for speculation; Vague	
126	12	126	18	Anadarko	Hearsay; Improper opinion/Calls for legal conclusion; Lacks foundation/No personal knowledge/Calls for speculation; Vague	