

**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
VINCENT PRICE**

<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>			
26	13	26	16	BP	Vague; Misstates The Record; FRE 602	
26	17	26	21	BP	FRE 602	
30	9	30	10	BP	Relevance	
30	11	30	13	BP	FRE 602	
30	14	30	16	BP	FRE 602	
32	15	32	18	BP	Colloquy	
32	20	32	23	BP	Misstates the Record; Vague; Argumentative	
68	18	68	22	BP	FRE 602	
69	4	69	11	Anadarko	Prejudicial/confusing/cumulative; Vague	
70	2	70	10	BP	FRE 602	
79	6	79	15	BP	Vague; Compound; 701	
81	7	81	10	BP	FRE 602; FRE 701	
81	11	81	15	BP	FRE 602; FRE 701	
81	24	82	2	BP	FRE 602; FRE 701	
82	23	83	1	BP	FRE 602; FRE 701	
83	4	83	8	BP	FRE 602; FRE 701	
83	9	83	11	BP	FRE 602; FRE 701	
83	12	83	16	BP	FRE 602; FRE 701	
84	18	84	21	BP	FRE 602; FRE 701	
84	22	84	25	BP	FRE 602; FRE 701	

119	18	119	23	BP	Misstates the Record; Vague; Argumentative; FRE 602	
123	10	123	14	BP	FRE 602; Relevance	
123	23	124	1	BP	FRE 602	
124	2	124	4	BP	Relevance; Prejudice	
125	2	125	6	BP	FRE 602	
138	3	138	6	BP	Relevance	
138	7	138	11	BP	Relevance	
138	12	138	17	BP	FRE 701	
138	18	138	20	BP	FRE 701	
139	11	139	14	BP	Relevance; Prejudice	
139	15	139	20	BP	Relevance; Prejudice	
140	7	140	12	BP	Relevance; Prejudice	
143	8	143	14	BP	Hearsay	
143	15	143	18	BP	Hearsay	
146	11	146	15	BP	Misstates the Record; Argumentative; Compound; Vague	
154	17	154	21	BP	Vague; Compound; FRE 602	
154	22	154	25	BP	Relevance; Prejudice	
157	2	157	4	BP	Relevance; Prejudice	
157	5	157	10	BP	FRE 602; Vague; Misstates the Record	
157	11	157	14	BP	Relevance; Prejudice	
157	15	157	18	BP	Relevance; Prejudice	
157	19	157	21	BP	Relevance; Prejudice	
157	22	157	24	BP	Relevance; Prejudice	
157	25	158	2	BP	FRE 701; FRE 602	
158	3	158	5	BP	Relevance; Prejudice	
158	6	158	8	BP	FRE 602; FRE 701	
158	12	158	15	BP	FRE 602	
158	16	158	18	BP	Relevance; Prejudice	
158	19	158	22	BP	Relevance; Prejudice	
158	23	158	25	BP	Relevance; Prejudice	
159	23	160	4	BP	FRE 602; FRE 701	
160	5	160	11	BP	FRE 602; FRE 701	
160	14	160	19	BP	FRE 602; FRE 701	
161	18	161	24	BP	Relevance; Prejudice	
161	25	162	2	BP	Relevance; Prejudice	
162	3	162	6	BP	FRE 602	

163	7	163	10	M-I	M-I objects on the ground no question was designated to the answer. M-I also objects on the ground of speculation. The answer on its face demonstrates the speculative nature. The witness admits “I would have to assume that . . .” (163:6) and acknowledges that “I’m one of the younger employees. I don’t know how that would—would shake out in the decision.” (163:8–9).	
163	10	163	17	M-I	M-I objects that to the testimony as calling for speculation. The question specifically calls for speculation in stating “You would assume . . .” (163:11–12). This is particularly true given that the witness previously stated in response to a question regarding the risk assessment: “Again, that’s kind of speculating what would I do if I was there, you know” (162:23–163:3) and the witness’s acknowledgement that “I’m one of the younger employees. I don’t know how that would—would shake out in the decision.” (163:8–9).	
163	18	163	21	M-I	M-I objects that to the testimony as calling for speculation and vague. The question calls for speculation given that the witness previously stated in response to a question regarding the risk assessment: “Again, that’s kind of speculating what would I do if I was there, you know” (162:23–163:3) and the witness’s acknowledgement that “I’m one of the younger employees. I don’t know how that would—would shake out in the decision.” (163:8–9). The question is also vague on its face in only calling	

					for whether “somebody else” would do something.	
164	2	164	5	BP	FRE 602	
164	6	164	8	BP	FRE 602	
165	9	165	13	BP	FRE 602	
166	3	166	5	BP	Relevance	
166	6	166	10	BP	Relevance	
166	11	166	14	BP	FRE 602	
166	15	166	17	BP	Relevance	
166	18	166	21	BP	FRE 602	
166	22	166	25	BP	FRE 602	
171	13	171	18	BP	Relevance	
171	19	171	23	BP	Relevance	
172	6	172	10	BP	Vague; Misstates the Record; Argumentative	
173	13	173	17	BP	Relevance; Prejudice	
173	18	173	22	BP	Relevance	
175	25	176	3	BP	FRE 602	
176	5	176	8	BP	FRE 602	
176	12	176	17	BP	Vague; FRE 602	
188	8	188	13	BP	FRE 602	
189	4	189	8	BP	Relevance; Prejudice	
191	13	191	15	BP	FRE 701; FRE 602	
191	24	192	3	BP	Vague; FRE 602	
193	21	193	23	BP	FRE 701; FRE 602	
195	22	196	3	Transocean	Witness testifies about Transocean’s responsibility in terms of monitoring the well. Lacks foundation (Fed. R. Evid. 602).	
204	5	204	9	BP	Relevance; Prejudice	
204	10	204	12	BP	Relevance	
207	9	207	14	BP	Relevance; FRE 702	
213	15	213	18	BP	Relevance	
213	19	213	21	BP	Relevance	
221	19	221	23	BP	FRE 602	
222	23	223	2	BP	Relevance; Prejudice	
224	10	224	13	BP	Relevance	
226	17	226	21	BP	FRE 602	
229	14	229	19	BP	Relevance; Prejudice	

229	20	229	21	BP	Relevance; Prejudice	
232	25	233	5	BP	Relevance; Prejudice	
234	23	235	3	BP	Relevance; Prejudice	
250	16	250	21	BP	Relevance; Prejudice	
250	22	251	2	BP	FRE 602	
264	1	264	4	BP	Relevance	
264	5	264	9	BP	Relevance; Evidence/Testimony does not meet the "substantially similar incident" doctrine	
264	10	264	13	BP	Relevance; Evidence/Testimony does not meet the "substantially similar incident" doctrine	
267	18	267	23	BP	Relevance; Prejudice	
267	24	268	3	BP	Relevance; Prejudice; FRE 602	
274	9	274	12	BP	Relevance; Prejudice	
274	13	274	16	BP	Relevance; Prejudice	
277	9	277	14	BP	FRE 602; Relevance	
277	9	277	20	Transocean	Witness is asked to speculate about the meaning of a statement made by someone else, and responds by referring to the Bly report. Lacks foundation (Fed. R. Evid. 602); Hearsay (Fed. R. Evid. 802).	
277	15	277	20	BP	Relevance; Prejudice	
278	6	278	23	Transocean	Counsel reads statements of another person into the record. Hearsay (Fed. R. Evid. 802); Counsel testifying.	
282	5	282	10	BP	FRE 602	
282	4	283	9	Cameron	Hearsay (FRE 802); Lack of Personal Knowledge (FRE 602); Lack of Expert Knowledge (FRE 701), Relevance (FRE 402)	
282	15	283	13	Transocean	Counsel reads statements of another person into the record and asks witness to speculate about the meaning of those statements. Lacks foundation (Fed. R. Evid. 602); Hearsay (Fed. R. Evid. 802); Counsel testifying.	

282	21	282	24	BP	FRE 602	
283	3	283	7	BP	Relevance; FRE 602	
283	8	283	13	BP	FRE 602; Vague; Misstates the Record; Argumentative	
283	10	283	20	Cameron	Hearsay (FRE 802); Lack of Personal Knowledge (FRE 602); Lack of Expert Knowledge (FRE 701), Relevance (FRE 402)	
283	14	283	20	BP	Vague; Misstates the Record; Argumentative	
283	14	283	20	Transocean	Witness testifies about the condition of the BOP stack. Lacks foundation (Fed. R. Evid. 602).	