

**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**
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* **SECTION: J**
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* **JUDGE BARBIER**
* **MAGISTRATE SHUSHAN**

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**ALL PARTIES OBJECTIONS TO DEPOSITION DESIGNATIONS OF
JEFF WOLFE**

<u>To</u>		<u>From</u>		<u>Objecting</u> <u>Party</u>	<u>Objection</u>	<u>Ruling</u>
<u>Page</u>	<u>Line</u>	<u>Page</u>	<u>Line</u>			
131	17	132	12	HESI	Misleading, optional completeness. HESI objects to the designation of the answers at 131:22-132:2 and 132:7-12 without the associated questions at 131:17-21 and 132:3-5. The partial designation renders the testimony misleading.	
134	15	134	25	Transocean	Question had been asked and answered.	
152	14	152	15	PSC	Lack of Personal Knowledge pursuant to FRE 602	
164	17	165	06	Transocean	Question is vague, ambiguous, and lacks foundation.	
174	25	175	10	PSC	Improper testimony pursuant to FRE 703	
174	05	175	10	Transocean	Witness is read and is asked to testify regarding the Marshall Islands Report and Joint Investigation hearings. Violation of 46 USC § 6308, Rec. Doc. 5635, and Rec. Doc. 5448.	
193	06	193	07	Transocean	Question is vague and	

					ambiguous.	
198	11	198	16	Transocean	Question is vague and ambiguous.	
201	15	201	19	Transocean	Witness is asked about and testifies regarding the Joint Investigation Hearings. Violation of 46 USC § 6308 and Rec. Doc. 5448. Question is vague and ambiguous.	
228	20	229	7	Transocean	Question is compound, vague and ambiguous.	
233	10	235	17	Transocean	Witness is read and asked to testify about the Joint Investigation hearings. Violation of 46 USC § 6308 and Rec. Doc. 5448.	
235	18	236	11	Transocean	Object to the question to the extent it refers to the Joint Investigation testimony of David Young. Question refers to and witness is asked to testify about testimony from the Joint Investigation hearings. Violation of 46 USC § 6308 and Rec. Doc. 5448. Question is compound, vague, and ambiguous.	
237	15	238	11	HESI	Misleading, optional completeness. HESI objects to the designation of the answer at 238:6-11 without the associated question and, in this case, the preceding question and answer at 237:15-238:4. The partial designation renders the testimony misleading.	
249	17	250	3	Transocean	Counsel misstates evidence and question is compound, vague and ambiguous.	

283	15	284	7	Transocean	Counsel misstates evidence, creating a confusing, vague, and ambiguous question. Question lacks foundation. Counsel conflates maintenance records with audits items.	
284	23	285	11	Transocean	Counsel misstates evidence, creating a confusing, vague, and ambiguous question. Question lacks foundation. Counsel conflates maintenance records with audits items.	
285	13	285	21	Transocean	Counsel misstates evidence, creating a confusing, vague, and ambiguous question. Question lacks foundation. Counsel conflates maintenance records with audits items.	
286	21	286	24	Transocean	Assumes facts not in evidence; counsel misstates evidence creating a confusing, vague, and ambiguous question. Question lacks foundation. Counsel conflates maintenance records with audits items.	
286	25	287	7	Transocean	Assumes facts not in evidence; counsel misstates evidence creating a confusing, vague, and ambiguous question. Question lacks foundation. Counsel conflates maintenance records with audits items.	
287	25	288	4	Transocean	Question is vague, ambiguous, and lacks foundation.	
293	11	294	8	Transocean	Question is vague, ambiguous, and lacks foundation.	
294	09	294	19	Transocean	Question is vague and ambiguous.	

309	9	309	16	PSC	Improper testimony pursuant to FRE 703	
315	09	316	18	Transocean	Counsel mischaracterizes testimony. Question is compound, vague, and ambiguous.	
315	24	316	09	Transocean	Counsel mischaracterizes testimony. Question is vague and ambiguous.	
321	7	321	9	Cameron	FRE 403 (Incomplete and Misleading)	
321	10	321	17	Cameron	FRE 106 (Optional Completeness)	
332	21	333	03	Transocean	Question is vague and ambiguous.	
339	08	340	16	Transocean	Counsel assumes facts not in evidence. Question is vague and ambiguous and beyond the scope of the expert report. Violates Rec. Doc. 5505.	