

**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**
*
* **JUDGE BARBIER**
* **MAGISTRATE SHUSHAN**

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**ALL PARTIES OBJECTIONS TO DEPOSITION DESIGNATIONS OF
DAVID BARNETT**

<u>From</u>		<u>To</u>		<u>Objecting Party</u>	<u>Objection</u>	<u>Ruling</u>
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37	2	37	5	BP	FRE 602	
37	6	37	8	BP	FRE 602	
45	24	46	4	BP	FRE 602; Hearsay	
46	5	46	8	BP	FRE 602; Hearsay	
54	16	54	18	BP	FRE 602; Vague; Ambiguous	
54	21	54	22	BP	FRE 602; Hearsay	
55	25	56	2	BP	Vague; Ambiguous; FRE 602; Hearsay	
56	4	56	6	BP	Hearsay; FRE 602	
57	12	57	13	BP	Vague; Ambiguous; FRE 602	
57	15	57	19	BP	Hearsay; FRE 602	
57	20	58	2	BP	Hearsay; FRE 602	
59	7	59	10	BP	Hearsay; FRE 602; FRE 701	
59	12	59	12	BP	FRE 602; FRE 701; Hearsay	
62	6	62	21	BP	FRE 602	
63	9	63	14	BP	FRE 602; Hearsay	
63	15	63	17	BP	Hearsay; FRE 602; FRE 701; Ambiguous	
63	19	63	20	BP	FRE 602; FRE 701; Hearsay	
63	21	64	2	BP	FRE 602; FRE 701; Hearsay	
64	3	64	5	BP	FRE 602; FRE 701; Hearsay	
64	12	64	15	BP	FRE 602; Vague; Ambiguous	
64	18	64	22	BP	FRE 602	

65	23	65	24	BP	Vague; Ambiguous; FRE 602	
66	2	66	11	BP	FRE 602	
67	20	67	24	BP	Misstates the Record; Vague; Ambiguous	
69	9	69	10	BP	Vague; Ambiguous; FRE 602	
71	17	71	23	BP	Hearsay; Misstates the Record; Vague; Ambiguous; FRE 602	
71	25	71	25	BP	FRE 602	
73	12	73	16	BP	FRE 602; Vague; Ambiguous; Hearsay	
73	18	73	21	BP	FRE 602	
75	5	75	10	BP	FRE 602; Vague; Ambiguous	
75	12	75	25	BP	FRE 602	
85	16	85	21	BP	FRE 602; FRE 701; Vague; Ambiguous; Misstates the Evidence	
85	23	85	25	BP	FRE 602; FRE 701	
86	1	86	4	BP	Misstates the Record; Vague; Ambiguous; FRE 602	
86	6	86	6	BP	FRE 602	
86	7	86	9	BP	Hearsay; Misstates the Record; FRE 602; FRE 701	
86	11	86	13	BP	FRE 602; FRE 701	
86	24	87	1	BP	Vague; Ambiguous; FRE 602	
87	3	87	3	BP	FRE 602	
87	4	87	5	BP	FRE 602; Vague; Ambiguous	
87	7	87	8	BP	FRE 602	
96	2	96	4	BP	Vague; Ambiguous; FRE 602; FRE 701	
96	6	96	6	BP	FRE 602; FRE 701	
96	12	96	15	BP	Misstates the Record; FRE 602; Hearsay	
96	17	96	17	BP	FRE 602	
97	21	97	23	BP	Vague; Ambiguous; FRE 602	
97	25	98	15	BP	FRE 602	
99	10	99	12	BP	Vague; Ambiguous; FRE 602	
99	14	99	14	BP	Vague; Ambiguous	
100	17	100	19	BP	FRE 602; Hearsay; Misstates the Record	
100	21	100	22	BP	FRE 602	
103	20	103	23	BP	Vague; Ambiguous; FRE 602	
103	25	104	6	BP	Hearsay; FRE 602	

104	7	104	11	BP	FRE 602; Misstates the Record	
104	13	104	15	BP	Hearsay	
106	9	106	14	BP	Hearsay; Misstates the Record; FRE 602	
106	16	106	24	BP	Hearsay	
110	6	110	9	BP	FRE 602; Misstates the Record; Hearsay	
110	11	110	11	BP	FRE 602; Hearsay	
111	13	111	16	BP	Misstates the Record; Hearsay; Vague; FRE 602; FRE 701	
111	19	111	19	BP	FRE 602; FRE 701	
115	6	115	11	BP	Hearsay; Misstates the Record; FRE 602	
115	13	115	14	BP	FRE 602	
117	19	117	21	BP	Hearsay; Vague; Ambiguous	
117	23	118	7	BP	Hearsay; FRE 602	
118	8	118	11	BP	Misstates the Record; FRE 602; Hearsay	
118	14	118	17	BP	FRE 602; Hearsay	
121	11	121	13	BP	Misstates the Record; Vague; Ambiguous; Hearsay	
121	15	121	19	BP	Hearsay	
121	20	121	23	BP	Vague; Ambiguous	
121	25	122	2	BP	FRE 602	
136	23	137	1	BP	Misstates the Record; FRE 602; FRE 701	
139	23	140	2	BP	Misstates the Record; Vague; Ambiguous; FRE 602; Hearsay	
140	4	140	4	BP	FRE 602; Hearsay	
140	18	140	21	BP	Hearsay; Vague; Ambiguous; FRE 602	
140	25	140	25	BP	Hearsay; FRE 602	
144	9	147	9	PSC	Hearsay; Lack of Foundation; Calls for Speculation	
147	4	147	6	BP	Hearsay; FRE 602; Misstates the Record	
147	9	147	9	BP	FRE 602; Hearsay	
147	19	148	14	PSC	Hearsay; Lack of Foundation; Calls for Speculation	
152	24	153	1	Transocean	relevance	
153	8	153	13	Transocean	relevance	
153	14	153	16	Transocean	relevance	
153	17	153	20	Transocean	relevance; lacks foundation; no	

					showing of personal knowledge	
153	21	153	25	Transocean	relevance; lacks foundation; no showing of personal knowledge	
162	24	162	25	BP	Misstates the Record; FRE 602; Vague; Ambiguous	
165	6	165	9	BP	Vague; Ambiguous; FRE 602	
165	16	165	17	BP	FRE 602	
166	2	166	5	BP	Vague; Ambiguous; FRE 602	
166	7	166	7	BP	FRE 602	
167	23	167	24	BP	Vague; Ambiguous; FRE 602	
168	1	168	3	BP	FRE 602	
169	21	169	23	Transocean	lacks foundation; no showing of personal knowledge	
169	25	170	3	Transocean	lacks foundation;no showing of personal knowledge; argumentative	
170	4	170	9	Transocean	lacks foundation; no showing of personal knowledge	
170	20	170	25	Transocean	relevance; compound; lacks foundation	
171	1	171	5	Transocean	relevance; lacks foundation; no showing of personal knowledge	
171	6	171	14	Transocean	relevance; compound; lacks foundation; argumentative	
174	25	175	3	BP	FRE 602; Misstates the Record	
175	5	175	6	BP	FRE 602	
176	8	176	10	BP	Misstates the Record; FRE 602	
176	12	176	17	BP	Hearsay; FRE 602	
176	21	177	1	BP	FRE 602; Hearsay	
177	9	177	12	BP	FRE 602; Hearsay; Vague; Ambiguous	
177	14	177	17	BP	Hearsay; FRE 602	
177	18	177	23	BP	FRE 602; Hearsay	
177	24	178	2	BP	FRE 602; Vague; Ambiguous	
178	2	178	2	BP	FRE 602; FRE 701	
178	4	178	10	BP	FRE 602; FRE 701	
178	11	178	13	BP	FRE 602; Vague; Ambiguous	
178	15	178	15	BP	FRE 602	
179	19	179	23	BP	Vague; Ambiguous	
187	20	187	24	BP	FRE 602; FRE 701; Misstates the Record	
188	1	188	3	BP	FRE 602; FRE 701	

190	4	190	8	BP	Misstates the Record; FRE 602; Hearsay	
192	12	192	16	BP	Hearsay; Vague; Ambiguous	
192	18	192	19	BP	Hearsay; FRE 602	
192	24	193	2	BP	Hearsay; FRE 602; Vague; Ambiguous	
193	4	193	6	BP	Hearsay; FRE 602	
198	17	198	21	BP	Misstates the Record	
198	24	199	1	BP	Vague; Ambiguous	
198	24	199	6	Transocean	argumentative; improper lay and/or expert opinion	
203	2	203	8	Transocean	lacks foundation; no showing of personal knowledge	
203	15	203	20	Transocean	relevance; vague and ambiguous	
204	2	204	2	BP	Vague; FRE 602	
204	4	204	4	BP	FRE 602	
204	11	204	17	BP	Vague; Argumentative; Ambiguous	
204	5	204	10	Transocean	argumentative; lacks foundation; no showing of personal knowledge	
204	11	204	22	Transocean	argumentative; compound; improper lay opinion	
205	13	205	22	Transocean	relevance; lacks foundation; argumentative; lacks personal knowledge	
205	23	206	9	Transocean	relevance; lacks foundation; compound; argumentative; Rule 407 (subsequent remedial measures)	
206	10	206	16	Transocean	relevance; lacks foundation; compound argumentative; Rule 407 (subsequent remedial measures)	
208	1	208	3	BP	Vague; Ambiguous	
212	24	213	2	BP	Misstates the Record; FRE 602	
213	4	213	6	BP	Misstates the Record; FRE 602	
231	18	231	19	BP	Vague; Ambiguous; FRE 602	
231	24	232	3	BP	Vague; Ambiguous; FRE 602	
235	11	235	13	BP	Vague; Ambiguous; FRE 602	
235	15	235	18	BP	FRE 602	
246	9	246	12	BP	Hearsay; Misstates the Record	
248	1	248	6	BP	Hearsay; FRE 602; Misstates the	

					Record; Vague	
249	5	249	7	BP	Misstates the Evidence; FRE 602; Vague	
249	9	249	11	BP	FRE 602	
249	17	249	19	BP	Misstates the Record; FRE 602; Vague; Ambiguous	
250	1	250	4	BP	Vague; Ambiguous; FRE 602	
250	6	250	6	BP	FRE 602	
251	8	251	11	BP	FRE 602; Vague; Ambiguous	
251	13	251	15	BP	Vague; Ambiguous; FRE 602	
251	17	251	18	BP	FRE 602	
258	1	258	2	BP	FRE 602; Vague	
258	4	258	4	BP	FRE 602	
262	3	262	7	BP	Hearsay; Misstates the Record; FRE 602	
262	17	262	20	BP	Misstates the Record; Hearsay; FRE 602	
262	22	262	25	BP	Hearsay; FRE 602	
263	1	263	4	BP	FRE 602; Vague	
263	7	263	9	BP	FRE 602; Hearsay; Vague	
263	11	263	11	BP	FRE 602; Hearsay	
271	4	271	6	BP	FRE 602; Vague	
271	8	271	8	BP	FRE 602	
279	5	279	8	BP	Vague; FRE 602	
285	9	285	11	BP	Vague; FRE 602; Hearsay	
285	13	285	13	BP	Hearsay; FRE 602	
285	21	286	1	BP	Argumentative; Misstates the Record	
286	23	287	1	BP	Misstates the Record; Vague	
287	3	287	6	BP	FRE 602	
288	1	288	4	BP	Misstates the Record	
313	4	313	8	Transocean	relevance; lacks foundation	
313	9	313	12	Transocean	relevance; lacks foundation	
313	13	313	20	Transocean	relevance; lacks foundation	
314	11	314	18	Transocean	argumentative; lacks foundation; no showing of personal knowledge	
314	19	315	2	Transocean	incomplete hypothetical; relevance; improper lay and/or expert opinion	
315	3	315	9	Transocean	incomplete hypothetical; lacks foundation; improper lay and/or	

					expert opinion	
315	10	315	19	Transocean	relevance	
315	22	316	18	Transocean	lacks foundation; relevance; hearsay	
316	23	317	6	Transocean	lacks foundation; relevance; hearsay	
317	9	317	23	Transocean	relevance; lacks foundation; improper expert opinion	
318	19	318	23	Transocean	relevance; vague and ambiguous	
318	24	319	4	Transocean	relevance; vague and ambiguous	
319	5	319	10	Transocean	incomplete hypothetical; lacks foundation; improper lay and/or expert opinion; vague & ambiguous; compound	
319	11	319	16	Transocean	incomplete hypothetical; lacks foundation; improper lay and/or expert opinion; vague & ambiguous	
319	17	319	22	Transocean	incomplete hypothetical; lacks foundation; improper lay and/or expert opinion; vague & ambiguous	
319	23	320	4	Transocean	lacks foundation; vague & ambiguous	
320	5	320	8	Transocean	hearsay; lacks foundation; vague & ambiguous	
320	9	320	17	Transocean	hearsay; lacks foundation; relevance	
320	18	320	21	Transocean	lacks foundation; improper lay and/or expert opinion; vague & ambiguous	
323	9	323	12	Transocean	lacks foundation; improper lay and/or expert opinion; argumentative	
323	13	323	21	Transocean	lacks foundation; improper lay and/or expert opinion; compound	
324	16	324	20	Transocean	lacks foundation; improper lay and/or expert opinion	
325	2	325	6	Transocean	lacks foundation; relevance; improper lay opinion	
325	7	325	12	Transocean	lacks foundation; relevance; improper lay opinion	
325	13	325	18	Transocean	lacks foundation; relevance; improper lay and/or expert opinion	

325	23	326	16	Transocean	lacks foundation; no showing of personal knowledge	
328	11	328	16	Transocean	lacks foundation; no showing of personal knowledge	
328	17	328	22	Transocean	lacks foundation; incomplete hypothetical; improper lay and/or expert opinion	
328	23	329	2	Transocean	lacks foundation; vague & ambiguous	
329	14	329	17	Transocean	relevance; lacks foundation	
329	18	329	20	Transocean	relevance; lacks foundation	
329	21	330	1	Transocean	relevance; lacks foundation; incomplete hypothetical; improper lay and/or expert opinion	
330	2	330	7	Transocean	lacks foundation; incomplete hypothetical; improper lay and/or expert opinion	
330	8	330	13	Transocean	lacks foundation; incomplete hypothetical; improper lay and/or expert opinion	
330	14	330	19	Transocean	lacks foundation; incomplete hypothetical; improper lay and/or expert opinion	
331	1	331	4	Transocean	lacks foundation; incomplete hypothetical; improper lay and/or expert opinion	
331	5	331	13	Transocean	lacks foundation; incomplete hypothetical; improper lay and/or expert opinion	
331	14	331	18	Transocean	lacks foundation; incomplete hypothetical; improper lay and/or expert opinion	
338	8	338	8	USDOJ	Foundation	
339	16	339	16	USDOJ	Foundation	
339	25	339	25	USDOJ	Foundation	