

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

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IN RE: Oil Spill by the Oil Rig
“Deepwater Horizon” in the Gulf of Mexico,
On April 20, 2010

MDL No. 2179

SECTION: J

This Document Relates to:
No. 10-4536

JUDGE BARBIER

MAG. JUDGE SHUSHAN
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:
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**BP EXPLORATION & PRODUCTION INC.’S DEPOSITION DESIGNATIONS AND
CONDITIONAL COUNTER DESIGNATIONS¹ FOR
RICHARD HERON**

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¹ BP Exploration & Production Inc. (BPXP) makes these designations subject to BPXP’s objections to testimony designated by other parties. BPXP reserves the right to withdraw some or all of these designations in the event BPXP’s objections or motions in *limine* directed to other parties’ designations are granted. BPXP further reserves the right to rely on any additional designations made by other parties. BPXP objects to the designation of testimony related to Phase 1 made by other parties as such testimony is irrelevant to this Penalty Phase. BPXP reserves its right to designate testimony related to Phase 1 and Phase 2 in the event the Court denies BPXP’s motion on prior incidents. BPXP will serve further objections in accordance with the schedule in the Court’s Order.

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74	20	75	8
75	9	77	3
77	7	77	20
77	22	78	3
80	11	81	3
82	22	83	16
84	24	85	15
91	17	91	20
101	17	102	18
124	22	127	3
128	18	128	20
134	24	135	7
136	1	136	10
136	12	136	15
138	11	138	11
138	13	138	20
141	24	142	14
153	2	153	13
153	15	153	22
153	24	154	4
154	14	154	22
155	6	155	16
159	2	159	14
162	8	162	9
162	11	162	17
167	15	168	5
176	16	176	23
176	25	177	1
178	4	178	6
178	8	178	12
218	17	219	5
219	8	220	2
220	4	220	8
222	6	222	25
230	22	231	5
231	7	232	13
232	15	235	1
235	3	235	15
239	17	239	25
244	23	245	9

245	11	245	25
246	23	247	1
247	3	247	12
247	14	247	22
247	24	248	13
250	3	250	5
250	7	252	14
254	3	254	18
254	20	255	9

Date: November 17, 2014

Respectfully submitted,

/s/ J. Andrew Langan

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