

## DEPOSITION BUNDLE INSTRUCTIONS

The deposition bundles (or “depo bundles”) being proffered to the Court on February 28, 2013 represent the witnesses who plaintiffs are presenting in their case-in-chief, but who will not be appearing live in Court. The bundle for each such witness contains the following materials:

- (1) "**Designation Tables**" folder (contains each party’s testimony designations and counter-designations for the deponent/witness – these are charts or tables of page and line designations, not the actual testimony);
- (2) "**Exhibits**" folder (contains PDFs of the deposition exhibits being submitted by the various parties for each deponent/witness);
- (3) "**General Objections**" folder (contains separate PDFs of the general objections made by each party which made general objections);
- (4) "**[deponent's name] Designations**" PDF (single document containing the deposition testimony designated by each party for purposes of the trial – THIS IS THE DOCUMENT WHICH CONTAINS THE ACTUAL DEPOSITION TESTIMONY);
- (5) "**[deponent's name] Objections All Parties**" PDF (single document with a chart of page and line objections to deposition testimony made by the various parties);
- (6) "**[deponent's name] Objections Exhibit**" PDF (single document with the exhibit objections submitted by the various parties).

The depo bundles are uploaded as a "zip" file. The user will click on the link for the depo bundle and will see a screen which will show the above listed folders and PDF documents.

All bundles will be admitted into this case “subject to objections” when they are proffered, as a result of which some testimony and exhibits may be excluded from evidence or not relied on by Judge Barbier.

You may access the material in the deposition bundles by downloading the zip files on this page.