



6. are inconsistent with the Court's many rulings to date concerning the relevance or discoverability of documents or information, any undue prejudice that may result from the use or reference to documents or information, or the privileged nature of any documents or information;
7. are inconsistent with any of the pending motions filed by BP or that may be filed by BP in accordance with the Court-ordered schedule for the presentation of pre-trial evidentiary issues via motions in limine or so-called *Daubert* motions; or
8. relate to issues reserved by the Court for determination during later trial Phases, including Phases II and III.

To the extent that the BP Parties have provided counter-designations or affirmative designations regarding the foregoing subject matters or any other matter objected to by the BP Parties in their specific page/line objections to other parties' designations, such designations by the BP Parties are contingent on, subject to, and without waiver of the BP Parties' specific and general objections.

Respectfully submitted,

/s/ J. Andrew Langan

Richard C. Godfrey, P.C.

J. Andrew Langan, P.C.

Kirkland & Ellis LLP

300 North LaSalle Street

Chicago, IL 60654

312-862-2000 (Tel)

312-862-2200 (Fax)

and

Robert C. "Mike" Brock

Covington & Burling LLP

1201 Pennsylvania Avenue, NW

Washington, DC 20004-2401

202-662-5985

Don K. Haycraft (Bar #14361)

R. Keith Jarrett (Bar #16984)

LISKOW & LEWIS

701 Poydras Street, Suite 5000

New Orleans, Louisiana 70139-5099

Telephone: (504) 581-7979

Facsimile: (504) 556-4108

**Attorneys for BP p.l.c., BP America  
Production Company, and BP Exploration &  
Production Inc.**