

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

\* \* \* \* \*

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**ALL PARTIES OBJECTIONS TO DEPOSITION DESIGNATIONS OF  
PATRICK CAMPBELL**

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Volume 1:

<u>From</u>		<u>To</u>		<u>Objecting Party</u>	<u>Objection</u>	<u>Ruling</u>
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32	6	32	19	BP	Not Relevant to Phase I	
33	12	34	24	BP	Not Relevant to Phase I	
34	25	38	19	BP	Not Relevant to Phase I	
41	12	42	6	BP	Not Relevant to Phase I	
47	6	47	13	Transocean	Lacks foundation (Fed.R.Evid. 602).	
49	16	49	22	BP	colloquy	
53	1	53	4	BP	Misstates the Record	
53	7	53	7	BP	Misstates the Record	
53	9	53	13	BP	Misstates the Record	
56	5	57	17	BP	FRE 602	
68	3	69	1	BP	Not Relevant to Phase I	
69	2	69	2	BP	Not Relevant to Phase I; FRE 602	
69	13	71	23	BP	Not Relevant to Phase I	
72	2	72	16	BP	Not Relevant to Phase I	
72	20	73	10	BP	Not Relevant to Phase I	
75	4	75	6	BP	FRE 602	
75	9	75	9	BP	FRE 602	
75	11	75	16	BP	FRE 602; vague	
75	19	75	19	BP	FRE 602; vague	
75	21	75	23	BP	FRE 602; vague	

76	2	76	3	BP	vague; FRE 602	
76	6	76	6	BP	vague; FRE 602	
83	3	87	11	BP	Not Relevant to Phase I	
87	8	87	11	BP	FRE 602	
87	14	87	15	BP	Not Relevant to Phase I; FRE 602	
87	18	88	23	BP	Not Relevant to Phase I	
88	24	89	1	BP	Not Relevant to Phase I; Assumes facts not in evidence	
89	5	89	24	BP	Not Relevant to Phase I	
90	2	90	9	BP	Not Relevant to Phase I	
90	13	90	13	BP	Not Relevant to Phase I	
90	16	96	10	BP	Not Relevant to Phase I	
96	13	97	21	BP	Not Relevant to Phase I	
97	22	97	24	BP	Not Relevant to Phase I; FRE 602; vague	
98	2	98	14	BP	Not Relevant to Phase I; FRE 602	
98	2	98	14	BP	Not Relevant to Phase I; FRE 602; vague	
98	15	103	8	BP	Not Relevant to Phase I	
103	9	103	11	BP	FRE 602; Not Relevant to Phase I	
103	15	104	4	BP	FRE 602; Not Relevant to Phase I	
104	5	107	25	BP	Not Relevant to Phase I	
108	1	108	3	BP	FRE 602; Not Relevant to Phase I	
108	6	108	25	BP	FRE 602; Not Relevant to Phase I	
111	5	111	8	BP	FRE 602; FRE 702; vague	
111	11	111	14	BP	FRE 602; FRE 702; vague	
111	18	113	7	BP	FRE 702	
113	8	113	10	BP	FRE 602	
113	13	113	13	BP	FRE 602	
113	24	114	5	BP	FRE 602; FRE 702; vague	
114	8	114	9	BP	FRE 602; FRE 702; vague	
114	11	115	20	BP	FRE 702	
115	21	115	23	BP	FRE 602; FRE 702	
116	1	116	1	BP	FRE 602; FRE 702	

116	3	116	6	BP	FRE 602; FRE 702; vague	
116	9	116	17	BP	FRE 602; FRE 702; vague	
116	19	117	15	BP	FRE 702	
117	19	118	9	Transocean	Lacks foundation (Fed.R.Evid. 602).	
118	13	120	9	BP	Not Relevant to Phase I	
120	10	120	12	BP	Not Relevant to Phase I; FRE 602	
120	15	120	21	BP	Not Relevant to Phase I	
120	22	120	23	BP	FRE 602; FRE 702; Not Relevant to Phase I	
121	2	121	3	BP	FRE 602; FRE 702; Not Relevant to Phase I	
121	4	121	21	BP	FRE 602; FRE 702; Not Relevant to Phase I	
122	1	123	19	BP	Not Relevant to Phase I	
123	20	123	20	BP	Not Relevant to Phase I; FRE 602; vague	
123	25	124	11	BP	colloquy	
124	13	125	23	BP	FRE 602; vague; Not Relevant to Phase I	
131	2	141	9	BP	Not Relevant to Phase I	
141	13	142	4	BP	Not Relevant to Phase I	
142	7	145	25	BP	Not Relevant to Phase I	
146	4	147	20	BP	Not Relevant to Phase I	
147	21	147	25	BP	Not Relevant to Phase I	
148	4	149	13	BP	Not Relevant to Phase I	
149	9	149	13	BP	FRE 602	
149	16	149	17	BP	FRE 602; Not Relevant to Phase I	
149	19	150	13	BP	Not Relevant to Phase I	
157	16	157	17	BP	compound; misstates the record	
157	20	157	20	BP	compound; misstates the record	
158	19	158	22	BP	FRE 602; vague	
166	20	170	17	BP	FRE 701	
171	13	171	18	BP	FRE 701; vague	
171	21	171	21	BP	FRE 701; vague	
173	7	175	24	BP	Not Relevant to Phase I	

176	21	189	18	BP	Not Relevant to Phase I	
189	14	189	22	BP	FRE 701	
190	1	190	2	BP	FRE 701	
200	19	201	10	Anadarko	Irrelevant	
203	9	207	1	BP	Not Relevant to Phase I	
210	25	211	9	BP	Not Relevant to Phase I	
211	11	211	16	BP	FRE 602; Not Relevant to Phase I	
211	19	211	22	BP	FRE 602; Not Relevant to Phase I	
211	24	216	2	BP	Not Relevant to Phase I	
217	21	221	21	BP	Not Relevant to Phase I	
224	3	224	20	BP	Not Relevant to Phase I	
224	21	224	21	BP	FRE 602; Not Relevant to Phase I	
224	24	225	1	BP	FRE 602; Not Relevant to Phase I	
227	1	227	14	BP	Not Relevant to Phase I	
227	15	227	17	BP	Not Relevant to Phase I; FRE 602	
227	20	227	23	BP	FRE 602; Not Relevant to Phase I	
227	25	228	9	BP	Not Relevant to Phase I	
228	10	228	13	BP	Not Relevant to Phase I; vague; FRE 701; FRE 602	
228	17	228	20	BP	Not Relevant to Phase I; FRE 701; FRE 602	
228	23	228	23	BP	Not Relevant to Phase I; FRE 701; FRE 602	
229	6	232	20	BP	Not Relevant to Phase I	
232	21	232	21	BP	FRE 602; Not Relevant to Phase I	
232	24	232	25	BP	Not Relevant to Phase I; FRE 602	
233	2	233	15	BP	Not Relevant to Phase I	
233	7	233	15	BP	Not Relevant to Phase I	
233	16	233	20	BP	Not Relevant to Phase I; FRE 602	
233	23	234	13	BP	Not Relevant to Phase I	
234	16	235	9	BP	Not Relevant to Phase I	

236	22	238	19	BP	Not Relevant to Phase I	
238	23	239	1	BP	Not Relevant to Phase I; argumentative; FRE 602	
239	4	239	4	BP	Not Relevant to Phase I; FRE 602	
239	6	239	14	BP	Not Relevant to Phase I	
256	20	256	21	BP	FRE 701; FRE 602	
256	24	256	24	BP	FRE 701; FRE 602	
264	2	264	3	BP	FRE 602	
264	6	265	11	BP	FRE 602	
271	23	272	1	BP	FRE 602	
276	10	276	15	BP	Not Relevant to Phase I; FRE 602; vague	
276	18	277	14	BP	Not Relevant to Phase I; FRE 602	
277	19	277	22	BP	Not Relevant to Phase I	
277	25	281	21	BP	Not Relevant to Phase I	
281	25	281	25	BP	Not Relevant to Phase I	
282	3	282	8	BP	Not Relevant to Phase I	
283	21	283	22	BP	Non-responsive	
288	24	289	4	BP	FRE 602	
289	10	289	11	BP	FRE 602	
290	21	292	7	BP	Not Relevant to Phase I	
292	8	292	10	BP	Not Relevant to Phase I; FRE 602; argumentative	
292	13	294	9	BP	Not Relevant to Phase I	
294	16	294	19	BP	Non-responsive	
294	21	294	22	BP	Non-responsive	
300	19	300	21	BP	Not Relevant to Phase I; FRE 602	
301	4	301	7	BP	Not Relevant to Phase I; FRE 602; argumentative	
301	12	301	19	BP	Not Relevant to Phase I; FRE 602	
301	21	302	18	BP	Not Relevant to Phase I	
302	22	302	24	BP	Not Relevant to Phase I	
302	25	303	1	BP	Not Relevant to Phase I; FRE 602	
303	5	303	6	BP	Not Relevant to Phase I; FRE 602	

303	11	306	18	BP	Not Relevant to Phase I	
306	21	307	1	BP	Not Relevant to Phase I	
312	19	312	23	BP	relevance	
313	1	313	2	BP	relevance	
313	4	313	14	BP	relevance; Evidence/Testimony does not meet the "substantially similar incident" doctrine	
313	17	313	18	BP	relevance; Evidence/Testimony does not meet the "substantially similar incident" doctrine	
314	6	314	7	BP	FRE 602	
314	12	314	13	BP	FRE 602	
334	24	337	23	BP	Not Relevant to Phase I	
339	2	339	14	BP	Not Relevant to Phase I	
339	17	339	19	BP	Not Relevant to Phase I	
339	21	340	19	BP	Not Relevant to Phase I	
345	16	348	12	BP	Not Relevant to Phase I	
348	15	348	15	BP	Not Relevant to Phase I	
348	17	348	20	BP	Not Relevant to Phase I	
348	23	350	18	BP	Not Relevant to Phase I	
353	14	357	2	BP	Not Relevant to Phase I	
357	5	371	4	BP	Not Relevant to Phase I	
452	15	433	1	Transocean	Attorney reading from Exhibit 597, Deepwater Horizon Emergency Response Manual. Hearsay (Fed.R.Evid. 802).	

Volume 2:

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11	18	13	8	BP	Not Relevant to Phase I	
16	16	35	19	BP	Not Relevant to Phase I	
36	14	39	21	BP	Not Relevant to Phase I	
40	2	40	11	BP	Not Relevant to Phase I	
40	14	40	16	BP	Not Relevant to Phase I	
41	15	48	25	BP	Not Relevant to Phase I	
50	6	50	11	BP	Not Relevant to Phase I	

50	18	50	18	BP	Not Relevant to Phase I	
50	20	51	1	BP	Not Relevant to Phase I	
51	8	51	13	BP	Not Relevant to Phase I	
51	16	51	16	BP	Not Relevant to Phase I	
63	2	63	3	BP	FRE 602	
63	6	63	8	BP	FRE 602	
63	19	63	22	BP	FRE 602	
63	25	64	9	BP	FRE 602	
68	20	68	23	BP	FRE 602	
69	1	69	2	BP	FRE 602	
70	20	70	24	BP	misstates the record; FRE 602	
71	2	71	2	BP	FRE 602	
71	4	71	8	BP	FRE 602	
71	11	71	12	BP	FRE 602	
73	8	73	11	BP	leading; FRE 602	
73	14	73	16	BP	FRE 602	
73	22	73	25	BP	leading; FRE 602; FRE 701	
74	3	74	5	BP	FRE 602; FRE 701	
77	24	78	2	BP	FRE 602	
78	5	78	5	BP	FRE 602	
79	18	80	16	BP	FRE 701	
80	19	80	20	BP	FRE 701	
80	22	80	24	BP	FRE 602; FRE 701	
81	2	81	11	BP	FRE 701	
81	17	81	19	BP	FRE 701; FRE 602	
81	22	82	9	BP	FRE 701	
83	24	85	25	BP	Not Relevant to Phase I	
86	1	86	5	BP	FRE 602; Not Relevant to Phase I	
86	8	86	8	BP	FRE 602; Not Relevant to Phase I	
86	10	86	20	BP	Not Relevant to Phase I	
99	19	100	15	BP	FRE 602; FRE 701	
100	18	101	6	BP	FRE 602; FRE 701	
101	9	101	9	BP	FRE 602	
101	17	102	21	BP	Not Relevant to Phase I	
102	24	102	25	BP	Not Relevant to Phase I	
103	6	103	8	BP	FRE 602; FRE 701	

103	11	104	7	BP	FRE 602; FRE 701	
109	6	109	11	BP	Not Relevant to Phase I	
109	14	110	5	BP	Not Relevant to Phase I; FRE 602	
110	8	110	25	BP	FRE 602; FRE 701	
111	9	111	12	BP	FRE 602; FRE 701	
111	19	112	1	BP	FRE 602; FRE 701	
112	4	113	10	BP	FRE 602; FRE 701	
114	5	114	9	BP	FRE 602; FRE 701	
145	6	145	7	BP	Not Relevant to Phase I	
145	13	145	15	BP	Not Relevant to Phase I	
146	1	146	11	BP	Not Relevant to Phase I	
146	19	146	23	BP	Not Relevant to Phase I	
148	8	149	10	BP	Not Relevant to Phase I	
149	25	150	4	BP	FRE 602; FRE 701	
150	10	150	22	BP	FRE 602; FRE 701	
151	1	151	4	BP	FRE 602; FRE 701; Not Relevant to Phase I	
151	8	151	13	BP	Not Relevant to Phase I; FRE 602; FRE 701	
156	15	156	21	BP	FRE 602; FRE 701	
157	3	157	12	BP	Not Relevant to Phase I: FRE 602	
157	15	157	21	BP	Not Relevant to Phase I: FRE 602	
157	24	157	24	BP	FRE 602; Not Relevant to Phase I	
158	1	160	1	BP	Not Relevant to Phase I; FRE 602	
160	4	160	4	BP	Not Relevant to Phase I; FRE 602	
168	21	170	10	BP	FRE 602; FRE 701	
177	16	177	17	BP	FRE 602	
177	20	177	21	BP	FRE 602	
183	2	186	1	BP	Not Relevant to Phase I	
186	4	186	10	BP	Not Relevant to Phase I	
186	13	186	13	BP	Not Relevant to Phase I	