

**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**

\* \* \* \* \*

---

**ALL PARTIES OBJECTIONS TO DEPOSITION DESIGNATIONS OF  
JACK CARTER ERWIN**

---

<u>From</u>		<u>To</u>		<u>Objecting</u> <u>Party</u>	<u>Objection</u>	<u>Ruling</u>
<u>Page</u>	<u>Line</u>	<u>Page</u>	<u>Line</u>			
11	5	11	14	Cameron	Vague. The witness was asked generically about what “you” should do to “check ... the ROV hot stab” when “changing the bottom RAM to a test RAM.” It is unclear to whom “you” is referring in the question. The witness later testified that the subsea engineer aboard the rig would be responsible for ensuring that the ROV intervention panel was connected to the proper ram through testing, and that Cameron was not involved in the testing. (See 310:23-312:11).	
48	19	48	22	BP	FRE 602	
58	17	58	19	BP	FRE 602	
60	3	60	5	BP	FRE 602	
60	7	60	7	BP	FRE 602	
60	18	60	21	BP	Argumentative; Misstates the record; Leading; FRE 602	
60	23	60	25	BP	Argumentative; Mistates the record; FRE 602	
76	8	76	12	BP	FRE 602; Compound; FRE 701	
76	14	76	19	BP	FRE 602; Compound; FRE 701	

83	12	83	18	BP	Argumentative; FRE 602	
83	20	83	21	BP	Argumentative; FRE 602	
84	21	84	24	BP	FRE 701	
85	1	85	1	BP	FRE 701	
85	3	85	4	BP	FRE 701	
88	9	88	11	BP	FRE 602	
88	13	88	14	BP	FRE 602	
89	8	89	10	BP	FRE 602	
89	12	89	12	BP	FRE 602	
91	7	91	11	BP	FRE 602	
91	13	91	22	BP	FRE 701	
91	24	91	24	BP	FRE 701	
135	15	135	18	BP	FRE 602; Compound	
135	20	135	21	BP	FRE 602; Compound	
160	11	160	12	BP	Argumentative	
160	14	160	15	BP	Argumentative	
160	21	160	24	BP	FRE 602	
161	1	161	1	BP	FRE 602	
169	9	169	10	BP	FRE 602	
169	12	169	12	BP	FRE 602	
169	17	169	22	BP	FRE 602; FRE 701	
169	25	170	3	BP	FRE 602; FRE 701	
170	19	170	21	BP	FRE 602	
170	23	170	23	BP	FRE 602	
210	22	212	2	Transocean	Counsel reads portion of Bly report and witness is asked (and answers) questions about the Bly report. Lacks foundation (Fed.R.Evid.602); Hearsay (Fed.R.Evid. 802).	
212	20	213	3	Transocean	Counsel reads portion of Bly report and witness is asked (and answers) questions about the Bly report. Lacks foundation (Fed.R.Evid.602); Hearsay (Fed.R.Evid. 802).	
245	7	245	11	BP	FRE 602; Leading; Argumentative	
245	13	245	13	BP	FRE 602; Leading; Argumentative	
249	17	249	18	BP	FRE 602	
249	20	249	23	BP	FRE 602	
250	15	250	19	BP	FRE 602	

250	21	250	24	BP	FRE 602	
363	1	363	9	Transocean	Refers to testimony in Coast Guard Hearing in violation of 46 USC § 6308.	
383	21	384	1	BP	FRE 602	
385	3	385	5	BP	FRE 602	
385	7	385	8	BP	FRE 602	
423	24	425	1	Transocean	Counsel reads portion of Bly report and witness is asked (and answers) questions about the Bly report. Lacks foundation (Fed.R.Evid.602); Hearsay (Fed.R.Evid. 802).	
487	8	487	11	BP	FRE 602; Vague	
487	13	487	15	BP	FRE 602; Vague	
512	10	512	12	BP	FRE 602	
512	14	512	14	BP	FRE 602	
513	5	513	7	BP	FRE 602	
513	9	513	9	BP	FRE 602	
513	10	513	15	BP	FRE 602	
513	17	513	17	BP	FRE 602	
516	25	517	3	BP	FRE 602	
517	5	517	6	BP	FRE 602	
523	22	523	25	BP	FRE 602; Vague	
524	2	524	2	BP	FRE 602; Vague	