

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

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**ALL PARTIES OBJECTIONS TO DEPOSITION DESIGNATIONS OF
EDWARD GAUDE**

<u>From</u>		<u>To</u>		<u>Objecting Party</u>	<u>Objection</u>	<u>Ruling</u>
<u>Page</u>	<u>Line</u>	<u>Page</u>	<u>Line</u>			
22	15	22	23	BP	FRE 602	
32	4	32	13	Cameron	Relevance. The witness explained at pp. 29-31 that loss of two redundant systems (in this case, two MUX cables) is not a single point failure.	
35	6	36	14	Cameron	Argumentative. There is no evidence that the witness had reason to consider or was asked any questions about the placement of the casing shears on the BOP stack while working in the crisis center.	
37	21	38	2	Cameron	Argumentative. The witness explained at pp. 11-13 and 15-16 that he works with BOP control systems, not the preventers themselves.	
39	19	39	25	Cameron	Argumentative. There is no evidence that the witness had reason to consider or was asked any questions about the programming for the EDS sequences while working in the crisis center.	
61	6	61	16	BP	FRE 602	

97	23	98	2	Cameron	Relevance. Time spent preparing for deposition has no tendency to make the existence of any fact that is of consequence to the determination of the action more or less probable.	
112	4	112	7	Cameron	Relevance. API Specification 16D (Ex. 8045) which governs the design of BOP control systems requires that a deadman system activate upon the loss of both hydraulics and communications. Specifically, Section 1, titled "Scope," states, "These specifications establish design standards for systems, that are used to control blowout preventers." Section 5.9.3, titled "Deadman Systems," states, "A deadman system is a safety system that is designed to automatically close the wellbore in the event of a simultaneous absence of hydraulic supply and signal transmission capacity in both subsea control pods." (Emphasis added).	
201	1	201	15	BP	FRE 602	
203	24	207	16	Cameron	Relevance. Exhibit 5152 is discussing replacement of rechargeable batteries on a Mark III BOP control system. That system was not on the Deepwater Horizon.	
234	21	245	10	Cameron	Relevance. The witness testified that he had no knowledge of Exhibits 5157, 5158, and 5159.	
262	12	262	19	Transocean	Calls for speculation; Lacks foundation (Fed. R. Evid. 602) and includes inadmissible opinion testimony (Fed. R. Evid. 701).	
262	25	263	5	Transocean	Calls for speculation; Lacks foundation (Fed. R. Evid. 602) and includes inadmissible opinion testimony (Fed. R. Evid. 701).	
263	13	263	16	Transocean	Lacks foundation (Fed. R. Evid. 602) and includes inadmissible opinion testimony (Fed. R. Evid. 701).	
318	12	318	20	BP	FRE 602	

318	19	319	6	BP	FRE 602	
320	10	320	20	BP	FRE 602	
321	2	321	11	BP	FRE 602	
323	1	323	6	BP	FRE 602	
323	5	323	13	BP	FRE 602	
337	15	337	19	BP	FRE 602	
338	3	338	10	Transocean	Lacks foundation (Fed. R. Evid. 602).	
342	13	342	21	Transocean	Lacks foundation (Fed. R. Evid. 602) and includes inadmissible opinion testimony (Fed. R. Evid. 701).	
344	6	344	13	BP	FRE 602	