

**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
MICHAEL SAUCIER**

<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>			
9	5	9	7	BP	Inadmissible by Statute	
42	21	42	23	BP	Inadmissible by Statute	
43	17	43	19	BP	Inadmissible by Statute	
69	9	69	15	BP	Vague; Compound	
69	25	70	5	BP	Vague; Compound	
70	10	70	15	BP	Vague; Compound	
70	17	70	17	BP	Vague; Compound	
71	24	71	25	BP	Vague; Compound	
72	2	72	2	BP	Vague; Compound	
72	9	72	12	BP	Misstates the Record	
72	14	72	14	BP	Misstates the Record	
75	17	75	19	BP	Vague	
75	21	75	21	BP	Vague	
99	21	99	25	BP	Vague; Compound	
100	2	100	4	BP	Vague; Compound	
100	12	100	13	BP	Vague	
100	15	100	16	BP	Vague	
105	25	106	1	BP	Vague; FRE 701	
106	3	106	4	BP	Vague; FRE 701	
108	4	108	9	BP	FRE 701; Vague	
108	11	108	14	BP	FRE 701; Vague	
108	15	108	18	BP	FRE 701; Vague	
108	20	108	20	BP	FRE 701; Vague	

108	21	108	25	BP	FRE 602; FRE 701	
109	2	109	2	BP	FRE 602; FRE 701	
112	2	112	8	BP	Compound	
112	10	112	12	BP	Compound	
112	19	112	22	BP	Compound; FRE 701	
112	24	113	1	BP	Vague; FRE 701	
113	3	113	5	BP	Vague; FRE 701	
114	14	114	20	BP	Vague; FRE 701; Compound	
116	4	116	5	BP	FRE 602; FRE 701	
116	7	116	11	BP	FRE 602; FRE 701	
116	12	116	19	BP	FRE 602; FRE 702; Compound	
116	21	116	21	BP	FRE 602; FRE 702; Compound	
116	22	116	23	BP	Vague; Compound; FRE 701	
116	25	116	25	BP	Vague; Compound; FRE 701	
117	1	117	4	BP	Vague; Compound; FRE 701	
117	6	117	6	BP	Vague; Compound; FRE 701	
123	22	124	1	BP	Compound; Vague	
124	3	124	4	BP	Compound; Vague	
127	5	127	8	BP	Vague; Compound; FRE 701	
127	10	127	11	BP	Vague; Compound; FRE 701	
127	12	127	16	BP	Vague; Compound; FRE 701	
127	18	127	20	BP	Vague; Compound; FRE 701	
143	14	143	17	BP	Non-responsive	
143	14	144	6	Transocean	Testimony lacks foundation (Fed.R.Evid.602) and includes inadmissible opinion testimony (Fed. R. Evid. 701).	
143	18	143	20	BP	Colloquy	
143	21	143	23	BP	Non-responsive	
144	4	144	6	BP	Vague	
144	8	144	8	BP	Vague	
144	8	144	12	Transocean	Testimony lacks foundation (Fed. R. Evid. 602) and includes inadmissible opinion testimony (Fed. R. Evid. 701).	
167	20	167	23	Anadarko	Compound; Irrelevant; Vague; Prejudicial/confusing/cumulative	
198	10	202	23	HESI	Relevance: HESI objects that the testimony offered in these pages concerns the National SAFE Award, which is irrelevant and	

					immaterial. With regard to testimony related to documents referred to at 200:22-202:17, HESI objects to relevance and hearsay.	
232	20	233	2	BP	Not Relevant to Phase I	
233	8	233	19	BP	Not Relevant to Phase I	
243	14	243	18	BP	Not Relevant to Phase I	
282	5	282	8	BP	Vague	
282	10	282	10	BP	Vague	
282	20	282	22	BP	Vague	
282	24	282	24	BP	Vague	
282	25	283	4	BP	Vague; Compound; FRE 602; FRE 701	
283	6	283	6	BP	Vague; Compound; FRE 602; FRE 701	
283	7	283	10	BP	Vague; FRE 602; FRE 701	
283	14	283	14	BP	Vague; FRE 602; FRE 701	
286	22	286	25	BP	FRE 701	
287	2	287	2	BP	FRE 701	
287	9	287	11	BP	FRE 701	
287	13	287	13	BP	FRE 701	
287	24	288	2	BP	FRE 701	
288	4	288	5	BP	FRE 701	
288	6	288	10	BP	FRE 701	
289	1	289	4	BP	FRE 701	
289	6	289	9	BP	FRE 701	
289	18	289	24	BP	FRE 701	
290	1	290	6	BP	FRE 701	
290	7	290	13	BP	FRE 701	
290	15	290	15	BP	FRE 701	
292	10	292	15	BP	FRE 701; Compound	
292	17	292	17	BP	FRE 701; Compound	
292	25	293	4	BP	FRE 602; FRE 701; Compound	
293	6	293	10	BP	FRE 602; FRE 701; Compound	
293	12	293	12	BP	FRE 602; FRE 701; Compound	
294	2	294	8	BP	FRE 602; FRE 701; Compound	
294	10	294	10	BP	FRE 602; FRE 701; Compound	
294	11	294	17	BP	FRE 602; FRE 701; Compound	
294	20	294	24	BP	FRE 602; FRE 701; Compound	
295	1	295	7	BP	FRE 602; FRE 701; Compound	

295	9	295	9	BP	FRE 602; FRE 701; Compound	
295	10	295	12	BP	FRE 602; FRE 701; Vague	
295	14	295	14	BP	FRE 602; FRE 701; Vague	
298	2	298	5	BP	FRE 602; FRE 701; Compound; Vague	
298	7	298	7	BP	FRE 602; FRE 701; Compound; Vague	
300	12	300	22	BP	FRE 602; FRE 701; Compound; Vague	
300	24	300	24	BP	FRE 602; FRE 701; Compound; Vague	
304	8	304	13	BP	FRE 602; FRE 701	
304	15	304	15	BP	FRE 602; FRE 701	
304	21	304	25	BP	FRE 602; FRE 701	
305	2	305	2	BP	FRE 602; FRE 701	
305	19	305	23	BP	FRE 602; FRE 701	
305	25	306	6	BP	FRE 602; FRE 701	
306	8	306	9	BP	FRE 602; FRE 701	
306	10	306	22	BP	FRE 602; FRE 701	
306	23	307	3	BP	FRE 602; FRE 701; Compound	
307	5	307	5	BP	FRE 602; FRE 701; Compound	
307	6	307	10	BP	FRE 602; FRE 701; Compound	
307	12	307	12	BP	FRE 602; FRE 701; Compound	
308	4	308	8	BP	Misstates the Record	
308	10	308	10	BP	Misstates the Record	
308	23	309	2	BP	Misstates the Record	
309	4	309	5	BP	Misstates the Record	
309	6	309	13	BP	Misstates the Record	
309	15	309	17	BP	Misstates the Record	
309	19	309	21	BP	Misstates the Record	
309	22	310	1	BP	FRE 602; FRE 701; Misstates the Record	
310	4	310	4	BP	FRE 602; FRE 701; Misstates the Record	
313	6	313	7	BP	FRE 602; FRE 701; Compound	
313	9	313	9	BP	FRE 602; FRE 701; Compound	
313	10	313	12	BP	FRE 602; FRE 701	
313	14	313	19	BP	FRE 602; FRE 701	
313	21	313	22	BP	FRE 602; FRE 701	
314	8	314	13	BP	FRE 602; FRE 701; Compound	
314	15	314	17	BP	FRE 602; FRE 701; Compound	

328	10	328	15	BP	FRE 602; FRE 701; Compound; Vague	
328	17	328	17	BP	FRE 602; FRE 701; Compound; Vague	
328	18	328	22	BP	FRE 602; FRE 701; Vague	
328	24	328	24	BP	FRE 602; FRE 701; Vague	
329	20	330	4	BP	Inadmissible by Statute	
330	11	330	18	BP	Inadmissible by Statute; Hearsay	
330	23	331	5	BP	Inadmissible by Statute; Hearsay	
330	11	331	22	Transocean	Counsel and witness read MBI testimony inadmissible pursuant to 46 U.S.C. § 6308.	
331	12	331	22	BP	Inadmissible by Statute; Hearsay	
331	23	332	1	BP	Vague; Compound	
332	3	332	3	BP	Vague; Compound	
334	2	334	7	BP	Misstates the Record; Compound	
334	9	334	9	BP	Misstates the Record; Compound	
334	10	334	14	BP	Misstates the Record; Compound	
334	16	334	16	BP	Misstates the Record; Compound	
334	17	334	20	BP	Misstates the Record; Compound; Vague; FRE 602; FRE 701	
334	22	334	23	BP	Misstates the Record; Compound; Vague; FRE 602; FRE 701	
334	25	335	3	BP	Misstates the Record; Compound; Vague; FRE 602; FRE 701	
335	19	335	23	BP	FRE 602; FRE 701	
335	25	336	2	BP	FRE 602; FRE 701	
344	19	344	23	BP	FRE 602; Misstates the Record	
345	9	345	11	BP	FRE 602; FRE 701	
345	13	345	22	BP	FRE 602; FRE 701	
368	9	368	12	BP	FRE 602; FRE 701; Vague	
368	14	368	14	BP	FRE 602; FRE 701; Vague	
368	15	368	18	BP	FRE 602; FRE 701; Vague; Compound	
368	20	368	20	BP	FRE 602; FRE 701; Vague; Compound	
373	12	373	14	BP	FRE 602; FRE 701; Compound	
373	16	373	16	BP	FRE 602; FRE 701; Compound	
375	21	375	24	BP	FRE 602; FRE 701	

376	1	376	1	BP	FRE 602; FRE 701	
377	22	378	8	BP	FRE 602; FRE 701; Compound	
378	10	378	10	BP	FRE 602; FRE 701; Compound	
379	14	379	18	BP	Compound; FRE 602; FRE 701	
379	20	380	3	BP	Compound; FRE 602; FRE 701	
380	5	380	12	BP	Compound; FRE 602; FRE 701	
380	14	380	14	BP	Compound; FRE 602; FRE 701	
380	15	380	21	BP	FRE 602; FRE 701	
380	22	380	24	BP	FRE 602; FRE 701	
381	1	381	1	BP	FRE 602; FRE 701	
381	2	381	6	BP	FRE 602	
381	8	381	8	BP	FRE 602	
381	9	381	12	BP	FRE 602; FRE 701; Vague	
381	14	381	15	BP	FRE 602; FRE 701; Vague	
381	16	381	17	BP	FRE 602	
381	19	381	19	BP	FRE 602	
383	14	383	22	BP	Inadmissible by Statute	
384	7	384	11	BP	Inadmissible by Statute	
384	13	384	14	BP	Inadmissible by Statute	
389	8	389	11	BP	FRE 602	
391	14	391	18	BP	Not Relevant to Phase I	
391	20	392	5	BP	Not Relevant to Phase I	
407	4	407	8	BP	Not Relevant to Phase I	
412	8	412	10	BP	Not Relevant to Phase I	
412	12	412	12	BP	Not Relevant to Phase I	
412	23	413	1	BP	Compound; Vague; FRE 602	
413	3	413	3	BP	Compound; Vague; FRE 602	
417	19	417	22	BP	Compound; Argumentative	
417	24	417	24	BP	Compound; Argumentative	
417	25	418	4	BP	Compound; Vague; FRE 602	
418	7	418	7	BP	Compound; Vague; FRE 602	
419	4	419	14	BP	Not Relevant to Phase I	
419	16	419	25	BP	Not Relevant to Phase I	
420	1	420	4	BP	Not Relevant to Phase I; Relevance	
420	6	420	6	BP	Not Relevant to Phase I; Relevance	
420	7	420	9	BP	Not Relevant to Phase I; Relevance	
420	11	420	12	BP	Not Relevant to Phase I;	

					Relevance	
420	25	421	20	BP	Not Relevant to Phase I; FRE 602	
421	22	421	22	BP	Not Relevant to Phase I; FRE 602	
424	1	425	3	BP	Relevance; FRE 602; Prejudice	
424	25	425	3	BP	Compound	
425	5	425	6	BP	Relevance; FRE 602; Prejudice; Compound	
425	8	425	16	BP	Relevance; FRE 602; Prejudice; Compound	
425	18	425	18	BP	Relevance; FRE 602; Prejudice; Compound	
428	5	428	10	BP	Compound; Argumentative	
428	12	428	12	BP	Compound; Argumentative	
428	13	428	19	BP	Compound; Argumentative; Vague	
428	21	428	21	BP	Compound; Argumentative; Vague	
429	14	429	17	BP	Compound; Vague	
429	19	429	20	BP	Compound; Vague	
431	8	433	18	BP	Relevance; Prejudice	
433	19	433	21	BP	Relevance; Prejudice; FRE 602	
433	23	433	23	BP	Relevance; Prejudice; FRE 602	
433	24	434	2	BP	Relevance; Prejudice	
434	21	435	14	BP	Relevance; Prejudice	
435	17	436	18	BP	Relevance; Prejudice	
436	20	437	9	BP	Relevance; Prejudice	
437	10	437	16	BP	Relevance; Prejudice; FRE 602; FRE 701; Compound	
437	19	437	20	BP	Relevance; Prejudice; FRE 602; FRE 701; Compound	
437	21	437	22	BP	Relevance; Prejudice; FRE 602; FRE 701; Compound	
437	24	437	24	BP	Relevance; Prejudice; FRE 602; FRE 701; Compound	
438	6	438	8	BP	Misstates the Record	
438	10	438	10	BP	Misstates the Record	
438	11	438	15	BP	Misstates the Record	
438	17	438	17	BP	Misstates the Record	
438	18	439	8	BP	Relevance; Prejudice	
439	20	439	24	BP	Relevance; Prejudice; FRE 602	

439	25	440	10	BP	Relevance; Prejudice; FRE 602; FRE 701	
440	9	440	10	BP	Relevance; Prejudice; FRE 602; FRE 701	
440	12	440	12	BP	Relevance; Prejudice; FRE 602; FRE 701	
440	13	441	3	BP	Relevance; Prejudice	
441	4	441	7	BP	FRE 602	
441	9	441	9	BP	FRE 602	
441	10	441	21	BP	Relevance; Prejudice	
449	25	450	8	BP	Prejudice; Misstates the Record	
450	10	450	10	BP	Prejudice; Misstates the Record	
450	11	450	14	BP	Prejudice; Misstates the Record	
450	16	450	17	BP	Prejudice; Misstates the Record	
450	18	450	20	BP	Prejudice; Misstates the Record	
451	3	451	8	HESI	Relevance: HESI objects that the testimony offered in these pages concerns the National SAFE Award, which is irrelevant and immaterial. With regard to testimony related to documents referred to at 200:22-202:17, HESI objects to relevance and hearsay.	
452	4	452	8	BP	Compound; Vague	
452	10	452	10	BP	Compound; Vague	
452	11	452	15	BP	Compound; Vague; FRE 602; FRE 701	
452	17	452	17	BP	Compound; Vague; FRE 602; FRE 701	