

**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**
*
* **JUDGE BARBIER**
* **MAGISTRATE SHUSHAN**

* * * * *

**ALL PARTIES OBJECTIONS TO DEPOSITION DESIGNATIONS OF
MARK SOGGE**

<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>			
39	21	41	5	HESI	The questioning calls for speculation, and there is no foundation for this witness to testify regarding the motives of BP employees.	
54	20	55	6	USDOJ	Beyond scope of Rule 30(b)(6) designation	
58	16	59	9	USDOJ	Beyond scope of Rule 30(b)(6) designation	
60	10	60	18	USDOJ	Lacks foundation (question excluded from designation)	
60	10	61	9	USDOJ	Beyond scope of Rule 30(b)(6) designation	
66	2	68	1	USDOJ	Lacks foundation (answer excluded from designation); Beyond scope of Rule 30(b)(6) designation	
87	2	87	9	USDOJ	Misstates prior testimony	
87	18	87	24	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation	
87	25	88	21	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Asked and answered	
101	10	102	1	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation	
103	16	103	24	USDOJ	Beyond scope of Rule 30(b)(6)	

					designation; Lacks foundation	
107	21	109	7	USDOJ	Beyond scope of Rule 30(b)(6) designation; Misstates prior testimony	
110	18	110	24	USDOJ	Beyond scope of Rule 30(b)(6) designation	
114	24	116	2	USDOJ	Beyond scope of Rule 30(b)(6) designation	
117	22	118	17	USDOJ	Beyond scope of Rule 30(b)(6) designation	
118	25	119	14	USDOJ	Beyond scope of Rule 30(b)(6) designation	
121	13	121	20	USDOJ	Beyond scope of Rule 30(b)(6) designation	
126	10	126	22	USDOJ	Beyond scope of Rule 30(b)(6) designation	
131	11	133	1	USDOJ	Beyond scope of Rule 30(b)(6) designation	
133	25	134	3	USDOJ	Beyond scope of Rule 30(b)(6) designation	
151	8	151	21	USDOJ	Beyond scope of Rule 30(b)(6) designation	
164	12	164	21	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Assumes facts not in evidence	
165	7	165	18	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation	
168	2	168	15	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Incomplete designation (omits answer)	
174	18	175	2	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Assumes facts not in evidence	
175	9	176	16	USDOJ	Beyond scope of Rule 30(b)(6) designation	
184	12	186	10	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Incomplete designation (omits portions of the answer)	
187	18	188	3	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Assumes facts not in evidence	
190	19	191	7	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Assumes facts not in evidence	

193	7	194	11	USDOJ	Beyond scope of Rule 30(b)(6) designation	
195	23	197	20	USDOJ	Beyond scope of Rule 30(b)(6) designation	
199	7	202	9	USDOJ	Beyond scope of Rule 30(b)(6) designation	
202	7	203	4	USDOJ	Beyond scope of Rule 30(b)(6) designation; Ambiguous	
207	4	210	15	USDOJ	Beyond scope of Rule 30(b)(6) designation	
211	2	211	10	USDOJ	Beyond scope of Rule 30(b)(6) designation	
211	11	211	24	USDOJ	Beyond scope of Rule 30(b)(6) designation; Misstates prior testimony; Ambiguous	
211	25	212	12	USDOJ	Beyond scope of Rule 30(b)(6) designation	
217	23	221	17	USDOJ	Beyond scope of Rule 30(b)(6) designation	
221	18	225	10	USDOJ	Beyond scope of Rule 30(b)(6) designation; Assumes facts not in evidence; Lacks foundation	
228	6	228	10	USDOJ	Beyond scope of Rule 30(b)(6) designation	
229	12	229	22	USDOJ	Lacks foundation; Assumes facts not in evidence	
237	13	240	23	USDOJ	Beyond scope of Rule 30(b)(6) designation; Compound; Assumes facts not in evidence; Lacks foundation	
244	20	245	15	USDOJ	Beyond scope of Rule 30(b)(6) designation; Ambiguous	
261	5	261	10	USDOJ	Beyond scope of Rule 30(b)(6) designation	
262	16	262	22	USDOJ	Beyond scope of Rule 30(b)(6) designation	
265	4	265	12	USDOJ	Calls for a legal conclusion; Lacks foundation; Assumes facts not in evidence; Leading	
267	24	268	2	USDOJ	Beyond scope of Rule 30(b)(6) designation	
271	23	272	10	USDOJ	Ambiguous	
273	12	282	5	USDOJ	Beyond scope of Rule 30(b)(6) designation	
282	6	282	16	USDOJ	Beyond scope of Rule 30(b)(6) designation; Assumes facts not in	

					evidence; Lacks foundation	
282	18	285	5	USDOJ	Beyond scope of Rule 30(b)(6) designation	
287	18	291	7	USDOJ	Beyond scope of Rule 30(b)(6) designation; Assumes facts not in evidence; Lacks foundation	
299	21	300	23	USDOJ	Beyond scope of Rule 30(b)(6) designation	
304	13	304	24	USDOJ	Ambiguous	
311	24	312	10	USDOJ	Beyond scope of Rule 30(b)(6) designation	
319	8	319	16	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Assumes facts not in evidence	
319	17	324	25	USDOJ	Beyond scope of Rule 30(b)(6) designation	
325	25	327	17	USDOJ	Beyond scope of Rule 30(b)(6) designation	
327	16	328	19	USDOJ	Colloquy of counsel not constituting testimony	
347	25	349	8	USDOJ	Beyond scope of Rule 30(b)(6) designation	
351	5	353	1	USDOJ	Beyond scope of Rule 30(b)(6) designation	
352	19	353	1	BP	FRE 602; Non Responsive	
354	23	357	14	USDOJ	Beyond scope of Rule 30(b)(6) designation	
357	24	358	11	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Assumes facts not in evidence	
361	14	362	3	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation	
363	7	363	17	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Assumes facts not in evidence	
365	1	365	16	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Assumes facts not in evidence	
366	6	370	24	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Assumes facts not in evidence	
412	23	413	2	USDOJ	Beyond scope of Rule 30(b)(6) designation	
415	19	416	5	USDOJ	Beyond scope of Rule 30(b)(6) designation	

417	16	417	24	USDOJ	Beyond scope of Rule 30(b)(6) designation	
421	15	421	20	BP	Argumentative; FRE 602 Assumes Facts Not in Evidence	
424	1	424	4	BP	FRE 602 Assumes Facts Not in Evidence	
424	8	424	12	BP	FRE 602 Assumes Facts Not in Evidence	
424	18	424	23	BP	FRE 602 Assumes Facts Not in Evidence	
425	2	425	4	BP	FRE 602 Assumes Facts Not in Evidence	
425	12	425	13	BP	FRE 602 Assumes Facts Not in Evidence	
426	15	426	18	BP	FRE 602 Assumes Facts Not in Evidence	
426	20	426	23	BP	FRE 602 Assumes Facts Not in Evidence	
427	1	427	2	BP	FRE 602 Assumes Facts Not in Evidence	
427	5	427	8	BP	Vague; FRE 602 Assumes Facts Not in Evidence	
427	11	427	12	BP	Vague; FRE 602 Assumes Facts Not in Evidence	
428	16	428	20	BP	FRE 602 Assumes Facts Not in Evidence	
428	23	428	24	BP	FRE 602 Assumes Facts Not in Evidence	
431	7	431	10	BP	FRE 602 Assumes Facts Not in Evidence	
431	14	431	15	BP	FRE 602 Assumes Facts Not in Evidence	
434	13	434	23	USDOJ	Ambiguous; Lacks foundation	
462	1	462	10	USDOJ	Beyond scope of Rule 30(b)(6) designation	
471	18	471	21	BP	Vague; FRE 602 Assumes Facts Not in Evidence	
472	1	472	2	BP	Vague; FRE 602 Assumes Facts Not in Evidence	
472	6	472	10	BP	FRE 602 Assumes Facts Not in Evidence	
473	12	473	15	BP	FRE 602 Assumes Facts Not in Evidence	
474	11	474	14	BP	Argumentative; compound; FRE 602 Assumes Facts Not in	

					Evidence	
474	20	474	23	BP	Vague; FRE 602 Assumes Facts Not in Evidence	
477	21	477	25	BP	Argumentative; FRE 602 Assumes Facts Not in Evidence	
478	3	478	4	BP	FRE 602 Assumes Facts Not in Evidence	
481	9	481	21	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation	
487	14	488	25	USDOJ	Beyond scope of Rule 30(b)(6) designation	
489	4	492	15	USDOJ	Beyond scope of Rule 30(b)(6) designation	
492	16	493	13	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation	
503	18	503	21	BP	FRE 602; FRE 701	
511	18	511	25	Transocean	lacks foundation	
511	18	511	25	USDOJ	Ambiguous	
512	8	512	16	Transocean	lacks foundation	
512	17	512	22	Transocean	lacks foundation	
514	5	514	16	Transocean	hearsay; lacks foundation; relevance	
514	17	516	6	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Assumes facts not in evidence	
514	20	515	13	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Assumes facts not in evidence	
515	17	516	6	Transocean	hearsay; lacks foundation; relevance	
516	10	516	18	Transocean	hearsay; lacks foundation	
516	10	517	4	USDOJ	Lacks foundation; Assumes facts not in evidence	
516	19	517	4	Transocean	lacks foundation	
517	6	517	18	Transocean	lacks foundation	
517	6	517	18	USDOJ	Beyond scope of Rule 30(b)(6) designation; Lacks foundation; Assumes facts not in evidence	