

**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**

MDL No. 2179

SECTION: J

**This Document Relates to:**  
**No. 10-4536**

JUDGE BARBIER

MAG. JUDGE SHUSHAN  
:  
:  
.....

---

**BP EXPLORATION & PRODUCTION INC.’S DEPOSITION DESIGNATIONS AND  
CONDITIONAL COUNTER DESIGNATIONS<sup>1</sup> FOR  
MICHAEL BEIRNE**

---

FROM		TO	
Page Number	Line Number	Page Number	Line Number
14	14	14	20
19	14	19	18
29	5	29	9
80	9	80	12
80	14	81	1
81	3	81	5
98	24	99	3
170	2	170	5
212	20	212	22
263	19	263	24
319	14	319	18
367	2	367	9
367	11	367	13
421	1	421	3

---

<sup>1</sup> BP Exploration & Production Inc. (BPXP) makes these designations subject to BPXP’s objections to testimony designated by other parties. BPXP reserves the right to withdraw some or all of these designations in the event BPXP’s objections or motions in *limine* directed to other parties’ designations are granted. BPXP further reserves the right to rely on any additional designations made by other parties. BPXP objects to the designation of testimony related to Phase 1 made by other parties as such testimony is irrelevant to this Penalty Phase. BPXP reserves its right to designate testimony related to Phase 1 and Phase 2 in the event the Court denies BPXP’s motion on prior incidents. BPXP will serve further objections in accordance with the schedule in the Court’s Order.

<b>421</b>	<b>5</b>	<b>421</b>	<b>9</b>
<b>475</b>	<b>12</b>	<b>476</b>	<b>1</b>

Date: November 17, 2014

Respectfully submitted,

/s/ J. Andrew Langan

Richard C. Godfrey, P.C.

Robert C. "Mike" Brock

J. Andrew Langan, P.C.

Hariklia Karis, P.C.

Matthew Regan, P.C.

Joseph A. Eisert

Kirkland & Ellis LLP

300 North LaSalle Street

Chicago, IL 60654

312-862-2000 (Tel)

312-862-2200 (Fax)

Don K. Haycraft (Bar #14361)

R. Keith Jarrett (Bar #16984)

LISKOW & LEWIS

701 Poydras Street, Suite 5000

New Orleans, Louisiana 70139-5099

Telephone: (504) 581-7979

Facsimile: (504) 556-4108

***Attorneys for BP Exploration & Production Inc.***