

**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**

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**ALL PARTIES OBJECTIONS TO DEPOSITION DESIGNATIONS OF
MICHAEL BEIRNE**

<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>			
28	25	29	1	BP	Colloquy	
34	2	34	6	Anadarko	Vague; Lacks foundation/No personal knowledge/Calls for speculation	
34	9	34	14	Anadarko	Vague; Lacks foundation/No personal knowledge/Calls for speculation	
34	17	34	21	Anadarko	Vague; Lacks foundation/No personal knowledge/Calls for speculation	
38	18	39	21	BP	FRE 602	
40	6	40	14	BP	FRE 602	
45	3	45	20	BP	FRE 602; Best Evidence	
47	8	48	25	BP	Relevance	
48	20	48	25	Anadarko	Calls for speculations; nonresponsive	
52	20	53	6	BP	Best Evidence	
53	23	54	15	BP	Best Evidence	
61	11	62	22	BP	FRE 602	
73	7	73	8	Anadarko	Vague; Lacks foundation/No personal knowledge/Calls for speculation	
73	10	73	12	Anadarko	Vague; Calls for speculation	
78	17	80	8	BP	FRE 602	
99	16	100	19	BP	Best Evidence	
100	20	100	23	BP	FRE 602; Best Evidence	
100	24	101	8	BP	Best Evidence	
103	8	103	21	BP	Best Evidence	

107	8	107	12	BP	FRE 602; Best Evidence	
130	7	131	3	BP	Relevance	
131	4	131	15	BP	Misstates the Record; Relevance; Compound; Vague	
131	16	131	22	BP	Relevance	
148	7	150	11	BP	Relevance	
154	16	156	6	BP	Relevance	
156	11	156	14	BP	Relevance	
156	19	158	17	BP	Relevance	
160	4	161	14	BP	Relevance	
170	6	172	6	BP	FRE 602	
171	17	171	19	Anadarko	Prejudicial/confusing; Vague	
171	21	172	2	Anadarko	Prejudicial/confusing; Vague	
172	19	174	4	BP	Relevance; FRE 602	
177	10	178	12	BP	Relevance	
178	13	178	19	BP	Compound; Relevance	
178	20	179	16	BP	Relevance	
179	17	179	25	BP	Relevance; Compound; Argumentative	
180	7	182	16	BP	Relevance	
182	17	183	11	BP	Relevance; FRE 602	
186	16	187	12	BP	Relevance; Argumentative; FRE 602; Best Evidence	
191	25	192	18	BP	FRE 602; Vague	
198	13	198	19	BP	Best Evidence; FRE 701; FRE 702	
198	20	198	24	BP	Colloquy	
198	22	198	24	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation; Nonresponsive	
199	1	199	4	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation; Nonresponsive	
199	1	199	11	BP	Best Evidence; FRE 701; FRE 702	
199	6	199	21	Anadarko	Vague; Lacks foundation/No personal knowledge/Calls for speculation; Nonresponsive	
200	18	200	20	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation	
200	22	200	24	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation	
202	23	203	4	BP	Misstates the Record; FRE 701; FRE 702	

203	12	203	17	BP	FRE 602	
209	7	209	23	BP	Best Evidence	
213	7	213	12	Anadarko	Irrelevant	
213	14	213	23	Anadarko	Irrelevant	
213	25	213	25	Anadarko	Irrelevant	
218	5	218	8	Anadarko	Vague; Improper opinion	
218	10	218	17	Anadarko	Vague; Improper opinion	
218	20	218	23	Anadarko	Vague; Improper opinion	
219	8	219	12	Anadarko	Vague; Improper opinion	
221	12	222	3	BP	FRE 602; Best Evidence; FRE 701; FRE 702	
222	9	222	11	Anadarko	Vague; Lacks foundation/No personal knowledge/Calls for speculation	
222	15	222	20	Anadarko	Vague; Lacks foundation/No personal knowledge/Calls for speculation	
224	6	224	13	Anadarko	Nonresponsive	
224	15	225	5	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation; Nonresponsive; Prejudicial/confusing/cumulative; Vague	
225	8	225	11	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation; Nonresponsive; Prejudicial/confusing/cumulative; Vague	
225	22	225	23	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation; Prejudicial/confusing/cumulative; Vague	
226	1	226	3	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation; Prejudicial/confusing/cumulative; Vague	
227	22	228	10	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation; Prejudicial/confusing/cumulative; Vague	
228	15	228	19	Anadarko	Irrelevant	
234	7	234	17	BP	Best Evidence	
235	11	235	17	BP	Best Evidence; FRE 701; FRE 702	
237	5	238	18	BP	FRE 602	

237	9	237	15	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation	
237	17	237	25	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation	
238	3	238	11	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation	
238	13	238	18	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation	
241	7	242	21	BP	Best Evidence	
248	15	249	3	BP	Best Evidence	
252	6	252	15	Anadarko	Irrelevant	
253	4	253	23	Anadarko	Irrelevant	
254	3	254	6	Anadarko	Irrelevant; Prejudicial/confusing/cumulative	
254	18	255	4	BP	Best Evidence	
257	10	257	13	Anadarko	Nonresponsive; Vague	
257	15	257	20	Anadarko	Nonresponsive; Vague	
268	10	268	13	Anadarko	Irrelevant	
268	15	268	19	Anadarko	Irrelevant; Lacks foundation/Calls for speculation; Vague	
268	21	269	5	Anadarko	Improper opinon/Calls for a Legal Conclusion; Irrelevant; Lacks foundation/Calls for speculation	
269	1	269	11	BP	Vague	
269	7	269	11	Anadarko	Improper opinon/Calls for a Legal Conclusion; Lacks foundation/Calls for speculation	
269	12	269	16	BP	FRE 602; FRE 701; FRE 702	
270	1	270	5	Anadarko	Irrelevant	
270	12	270	24	Anadarko	Irrelevant	
271	1	271	1	Anadarko	Irrelevant	
274	24	275	13	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation; Nonresponsive	
275	16	275	16	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation	
278	9	278	17	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation	
278	20	278	20	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation	

279	9	279	14	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation	
279	17	279	21	Anadarko	Lacks foundation/No personal knowledge/Calls for speculation; Nonresponsive	
280	23	281	1	Anadarko	Prejudicial/confusing/cumulative; Vague	
281	4	281	4	Anadarko	Prejudicial/confusing/cumulative; Vague	
304	15	304	25	BP	Relevance; FRE 602	
318	21	319	13	BP	FRE 602	
349	10	350	20	BP	FRE 602	
351	14	352	16	BP	FRE 602	
357	6	357	20	BP	FRE 602	
364	21	365	3	BP	Relevance	
366	20	367	1	BP	Best Evidence; Relevance; FRE 602	
367	19	368	6	BP	FRE 602; FRE 701	
382	8	385	14	BP	Best Evidence	
391	5	391	17	Anadarko	Lacks Foundation/No Personal Knowledge/Calls for Speculation; Misstates prior testimony; Nonresponsive	
404	11	404	25	BP	FRE 602	
405	13	405	25	BP	FRE 602; Hearsay	
406	23	407	8	Anadarko	Nonresponsive; Hearsay	
414	24	415	15	BP	FRE 602; Misstates the Record	
415	16	415	23	BP	Vague; Misstates the Record; Argumentative	
415	24	416	7	BP	Misstates the Record	
422	24	423	5	BP	FRE 602; Vague	
433	24	434	3	BP	FRE 602	
438	22	439	3	BP	FRE 602; Vague	
476	2	478	4	BP	FRE 602	
485	5	487	19	BP	FRE 602	
487	2	487	19	BP	Vague	
488	14	489	14	BP	Best Evidence; FRE 701; FRE 702	
492	11	493	23	BP	Vague; FRE 602	
494	14	495	5	BP	Vague; FRE 602	
505	12	505	25	BP	Relevance	