

**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
SCHERIE DOUGLAS**

<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>			
20	9	20	11	BP	FRE 602	
20	14	20	17	BP	FRE 602	
27	23	28	1	BP	Vague	
28	4	28	7	BP	Vague	
28	8	28	10	BP	Misstates the Record	
28	13	28	13	BP	Misstates the Record	
28	16	28	18	BP	Misstates the Record	
28	21	28	22	BP	Misstates the Record	
30	13	30	16	BP	FRE 602	
30	19	30	20	BP	FRE 602	
30	21	31	1	BP	FRE 602; Misstates the Record	
31	5	31	5	BP	FRE 602; Misstates the Record	
32	14	32	16	BP	Asked and Answered; argumentative	
32	19	32	19	BP	Asked and Answered; argumentative	
33	8	33	11	BP	FRE 602; Misstates the Record	
33	14	33	14	BP	FRE 602; Misstates the Record	
34	4	34	8	BP	FRE 602; Misstates the Record	
34	11	34	13	BP	FRE 602; Misstates the	

					Record	
36	7	36	9	BP	FRE 602	
36	12	36	12	BP	FRE 602	
36	21	36	23	BP	FRE 602	
37	1	37	2	BP	FRE 602	
37	20	37	24	BP	FRE 602	
38	2	38	3	BP	FRE 602	
39	10	39	11	BP	Misstates the Record; FRE 602	
39	14	39	15	BP	FRE 602; Misstates the Record	
39	16	39	18	BP	FRE 602; Asked and Answered	
39	21	39	21	BP	FRE 602; Asked and Answered	
39	22	40	2	BP	FRE 602	
40	3	40	9	BP	FRE 602	
42	12	42	15	BP	FRE 602; Misstates the Record	
42	18	43	5	BP	FRE 602; Misstates the Record	
43	8	43	12	BP	FRE 602	
43	15	43	16	BP	FRE 602	
43	17	43	22	BP	FRE 602; Asked and Answered; argumentative	
43	25	44	2	BP	FRE 602; Asked and Answered; argumentative	
44	21	44	25	BP	Misstates the Record; FRE 602	
45	4	45	7	BP	Misstates the Record; FRE 602	
45	15	45	18	BP	FRE 602	
45	21	46	6	BP	FRE 602	
46	9	46	15	BP	FRE 602	
46	21	46	24	BP	FRE 602	
47	3	47	6	BP	FRE 602	
47	8	47	8	BP	FRE 602	
47	13	47	15	BP	FRE 602; Asked and Answered	
47	18	47	20	BP	FRE 602; Asked and Answered	
49	9	49	12	BP	Asked and Answered	

49	15	49	19	BP	Asked and Answered	
50	8	50	11	BP	Asked and Answered	
50	16	50	17	BP	Asked and Answered	
50	22	50	24	BP	FRE 602	
51	2	51	2	BP	FRE 602	
51	8	51	11	BP	Vague; FRE 602	
51	14	51	17	BP	Vague; FRE 602	
51	20	51	23	BP	FRE 602	
52	1	52	8	BP	FRE 602	
52	12	52	17	BP	FRE 602	
53	15	53	17	BP	FRE 602	
53	20	53	23	BP	FRE 602	
54	1	54	4	BP	FRE 602	
54	7	54	7	BP	FRE 602	
54	11	54	11	BP	FRE 602	
54	14	54	15	BP	FRE 602	
60	24	60	25	BP	FRE 602	
61	3	61	3	BP	FRE 602	
62	2	62	7	BP	Vague; Misstates the Record	
62	17	62	20	BP	Vague; Misstates the Record	
62	23	62	23	BP	Vague; Misstates the Record	
63	13	63	14	BP	FRE 602	
63	17	63	18	BP	FRE 602	
63	19	64	9	BP	FRE 602	
64	10	64	14	BP	FRE 602; Misstates the Record	
64	17	64	24	BP	FRE 602; Misstates the Record	
65	2	65	5	BP	FRE 602; Misstates the Record	
65	8	65	11	BP	FRE 602; Misstates the Record	
65	19	65	21	BP	FRE 602	
68	5	68	7	BP	FRE 602	
68	10	68	10	BP	FRE 602	
68	19	68	21	BP	Asked and Answered	
68	24	68	25	BP	Asked and Answered	
70	23	70	24	BP	Assumes Facts Not in Evidence	
71	2	71	3	BP	Assumes Facts Not in Evidence	

71	22	71	24	BP	FRE 602	
72	2	72	3	BP	FRE 602	
73	10	73	12	BP	Asked and Answered; Vague	
73	15	73	19	BP	Asked and Answered; Vague	
74	19	74	22	BP	Asked and Answered	
75	1	75	8	BP	Asked and Answered; Misstates the Record	
75	11	75	11	BP	Asked and Answered; Misstates the Record	
76	2	76	3	BP	Misstates the Record	
76	6	76	7	BP	Misstates the Record	
81	10	81	13	BP	FRE 602; Misstates the Record	
83	18	83	22	BP	FRE 602; Asked and Answered; Misstates the Record	
84	1	84	2	BP	FRE 602; Asked and Answered; Misstates the Record	
84	9	84	11	BP	Misstates the Record	
84	14	84	15	BP	Misstates the Record	
84	19	84	22	BP	FRE 602	
84	24	85	2	BP	FRE 602	
85	3	85	5	BP	Misstates the Record	
85	9	85	10	BP	Misstates the Record	
87	13	87	16	BP	FRE 602	
87	18	87	18	BP	FRE 602	
87	24	88	1	BP	FRE 602	
88	4	88	7	BP	FRE 602	
89	2	89	5	BP	Vague	
89	12	89	15	BP	Vague	
89	18	89	20	BP	Vague	
98	3	98	7	BP	FRE 602; Asked and Answered	
98	9	98	10	BP	FRE 602; Asked and Answered	
99	17	99	23	BP	FRE 602	
100	1	100	1	BP	FRE 602	
100	5	100	8	BP	FRE 602	
103	25	104	1	BP	FRE 602	
104	4	104	4	BP	FRE 602	

105	5	105	7	BP	FRE 602; Vague	
105	10	105	12	BP	FRE 602; Vague	
113	19	113	21	BP	FRE 602	
113	24	113	25	BP	FRE 602	
115	6	115	8	BP	Vague	
115	12	115	15	BP	Vague	
119	24	120	2	BP	FRE 602	
120	5	120	5	BP	FRE 602	
121	20	121	21	BP	FRE 602	
121	24	122	2	BP	FRE 602	
123	10	123	12	BP	Vague	
123	15	123	16	BP	Vague	
128	4	128	7	BP	FRE 602	
128	10	128	15	BP	FRE 602	
139	14	139	17	BP	FRE 602	
140	10	140	12	BP	FRE 602	
140	24	141	6	BP	FRE 602	
141	13	141	14	BP	FRE 602	
141	24	142	1	BP	FRE 602	
142	4	142	5	BP	FRE 602	
142	22	142	24	BP	FRE 602	
143	2	143	4	BP	FRE 602	
153	1	153	2	BP	FRE 602	
153	5	153	7	BP	FRE 602	
158	19	158	22	BP	FRE 602	
161	25	162	3	BP	FRE 602	
162	6	162	10	BP	FRE 602	
165	24	166	7	BP	Vague; FRE 602	
166	13	166	19	BP	Vague; FRE 602	
167	7	167	11	BP	FRE 602	
167	15	167	18	BP	FRE 602	
167	19	167	21	BP	FRE 602	
167	22	168	4	BP	FRE 602	
168	7	168	9	BP	FRE 602	
168	22	169	2	BP	FRE 602	
169	5	169	6	BP	FRE 602	
170	17	170	22	BP	FRE 602	
170	25	171	4	BP	FRE 602	
177	1	177	7	BP	FRE 602	

177	10	177	13	BP	FRE 602	
177	15	177	15	BP	FRE 602	
179	12	179	16	BP	FRE 602	
179	18	179	19	BP	FRE 602	
181	6	181	10	BP	Misstates the Record	
181	13	181	15	BP	Misstates the Record	
181	23	181	23	BP	Misstates the Record	
181	25	181	25	BP	Misstates the Record	
182	2	182	3	BP	Misstates the Record	
192	9	192	12	BP	FRE 602; Vague	
192	15	192	21	BP	FRE 602; Vague	
192	25	193	3	BP	FRE 602; Vague	
204	12	204	15	BP	FRE 602	
204	18	204	20	BP	FRE 602	
205	4	205	7	BP	FRE 602	
205	10	205	15	BP	FRE 602	
206	12	206	14	BP	FRE 602	
206	18	206	20	BP	FRE 602	
208	10	208	15	BP	Misstates the Record	
208	18	208	21	BP	Misstates the Record	
209	15	209	21	BP	Misstates the Record	
209	24	209	25	BP	Misstates the Record	
210	1	210	6	BP	FRE 602	
210	10	210	10	BP	FRE 602	
214	25	215	5	BP	FRE 602	
215	8	215	9	BP	FRE 602	
220	25	221	1	BP	FRE 602	
221	4	221	4	BP	FRE 602	
222	23	223	2	BP	FRE 602	
223	5	223	7	BP	FRE 602	
223	19	223	22	BP	FRE 602	
224	1	224	6	BP	FRE 602	
224	9	224	14	BP	FRE 602	
224	20	224	23	BP	FRE 602	
225	1	225	3	BP	FRE 602	
226	19	226	22	BP	FRE 602	
226	25	226	25	BP	FRE 602	
237	18	237	20	BP	FRE 602	
237	23	237	24	BP	FRE 602	

239	7	239	9	BP	FRE 602	
239	13	239	14	BP	FRE 602	
243	4	243	6	BP	Assumes Facts Not in Evidence	
243	8	243	10	BP	Assumes Facts Not in Evidence	
248	4	248	7	BP	FRE 602	
248	9	248	11	BP	FRE 602	
252	15	252	17	BP	Vague	
252	20	252	24	BP	Vague	
253	3	253	4	BP	Vague	
253	12	253	17	BP	Vague	
254	20	254	22	BP	FRE 602	
254	24	254	25	BP	FRE 602	
255	14	255	16	BP	FRE 602	
255	18	255	18	BP	FRE 602	
258	24	259	1	BP	FRE 602	
259	3	259	6	BP	FRE 602	
259	14	259	16	BP	FRE 602	
259	18	259	22	BP	FRE 602	
259	24	259	25	BP	FRE 602	
260	16	260	18	BP	FRE 602	
260	20	260	24	BP	FRE 602	
261	1	261	3	BP	FRE 602	
262	19	262	24	BP	FRE 602	
263	1	263	3	BP	FRE 602	
264	18	264	20	BP	FRE 602	
264	22	264	24	BP	FRE 602	
265	6	265	10	BP	FRE 602	
265	12	265	14	BP	FRE 602	
265	15	265	16	BP	FRE 602	
265	17	265	21	BP	FRE 602	
265	23	265	24	BP	FRE 602	
267	2	267	8	BP	FRE 602	
267	11	267	15	BP	FRE 602	
271	17	271	20	BP	FRE 602	
283	4	283	8	BP	FRE 602	
283	11	283	11	BP	FRE 602	
284	22	285	9	BP	Beyond the Scope of 30(b)(6) Notice	

285	10	285	11	BP	Beyond the Scope of 30(b)(6) Notice	
285	14	285	23	BP	Beyond the Scope of 30(b)(6) Notice	
286	1	286	8	BP	Beyond the Scope of 30(b)(6) Notice	
286	11	286	19	BP	Beyond the Scope of 30(b)(6) Notice	
295	17	295	20	BP	FRE 602	
296	10	296	15	BP	FRE 602; Vague	
296	18	296	22	BP	FRE 602; Vague	
296	25	296	25	BP	FRE 602; Vague	
297	21	298	10	M-I	M-I objects because the questions (same question twice) are vague, ambiguous, lack foundation, and call for a legal opinion. Asking a witness to offer a legal opinion is a violation of the principal that issues of law are for the court to determine and are not properly the subject of testimony. Additionally, this witness is not trained as a lawyer and is not qualified to offer such an opinion.	