

**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
IAN LITTLE**

<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>			
32	12	32	19	BP	Relevance	
32	23	33	2	BP	Relevance	
50	21	51	7	BP	Inadmissible by Statute	
51	8	52	13	BP	Inadmissible by Statute	
53	12	55	24	BP	Inadmissible by Statute	
60	11	60	15	BP	Misstates the Record; Compound	
60	17	60	18	BP	Misstates the Record; Compound	
60	25	61	6	BP	Misstates the Record; Compound	
61	8	61	9	BP	Misstates the Record; Compound	
61	12	61	20	BP	Misstates the Record; Compound	
62	8	62	14	BP	Misstates the Record; Compound	
62	15	62	17	BP	Argumentative	
62	19	62	19	BP	Argumentative	
64	4	64	20	BP	Misstates the Record; Compound	
64	21	65	10	BP	Misstates the Record; Argumentative; Compound	
65	21	70	20	BP	FRE 701; FRE 602	
71	6	72	2	BP	FRE 701; FRE 602	
76	23	77	4	BP	Misstates the Record; FRE 602	
78	12	78	16	BP	FRE 701; FRE 602	
78	18	78	21	BP	FRE 701; FRE 602	
78	19	78	21	BP	FRE 701; FRE 602	
78	23	79	2	BP	FRE 701; FRE 602	

79	14	79	18	BP	FRE 701; FRE 602	
80	2	80	5	BP	FRE 701; FRE 602	
80	8	80	9	BP	FRE 701; FRE 602	
80	10	80	12	BP	FRE 701; FRE 602; Inadmissible by Statute	
80	14	80	15	BP	FRE 701; FRE 602; Inadmissible by Statute	
80	19	80	23	BP	FRE 701; FRE 602; Inadmissible by Statute	
80	25	81	1	BP	FRE 701; FRE 602; Inadmissible by Statute	
81	2	81	6	BP	FRE 701; FRE 602	
81	10	81	11	BP	FRE 701; FRE 602	
81	14	81	18	BP	FRE 701; FRE 602	
81	23	82	3	BP	FRE 701; FRE 602	
82	6	82	12	BP	FRE 701; FRE 602	
82	14	83	6	BP	FRE 701; FRE 602	
84	12	85	7	BP	FRE 602	
85	10	85	13	BP	FRE 602	
85	14	85	21	BP	FRE 701; FRE 602	
86	14	86	18	BP	FRE 701; FRE 602	
86	22	86	22	BP	FRE 701; FRE 602	
87	17	87	23	BP	Misstates the Record	
88	2	88	7	BP	Misstates the Record	
90	18	91	2	BP	FRE 701; FRE 602	
91	4	91	15	BP	FRE 701; FRE 602	
92	8	93	6	BP	FRE 701; FRE 602	
93	11	94	4	BP	FRE 701; FRE 602	
94	6	94	8	BP	FRE 701; FRE 602	
94	20	95	13	BP	FRE 701; FRE 602	
95	23	96	12	BP	FRE 701; FRE 602	
96	20	97	3	BP	FRE 701; FRE 602	
97	10	97	16	BP	FRE 701; FRE 602	
97	18	97	18	BP	FRE 701; FRE 602	
97	20	97	21	BP	FRE 701; FRE 602	
98	11	99	18	BP	FRE 701; FRE 602	
99	20	100	21	BP	FRE 701; FRE 602	
106	11	106	17	BP	Vague; Compound	
106	19	106	19	BP	Vague; Compound	

117	9	117	14	BP	FRE 701; FRE 602; Compound; Vague	
117	18	117	19	BP	FRE 701; FRE 602; Compound; Vague	
121	14	122	5	BP	FRE 701; FRE 602	
122	23	123	7	BP	FRE 701; FRE 602	
123	25	124	4	BP	FRE 602	
124	13	124	14	BP	FRE 602	
124	15	124	22	BP	FRE 602	
124	25	125	1	BP	FRE 602	
125	16	125	18	BP	FRE 602	
125	21	125	21	BP	FRE 602	
125	25	126	1	BP	FRE 602	
126	7	126	21	BP	FRE 701; FRE 602	
127	16	127	19	BP	FRE 602	
128	13	128	16	BP	FRE 602; Compound	
128	18	128	22	BP	FRE 602; Compound	
128	23	129	1	BP	FRE 602; Compound; Argumentative	
129	3	129	4	BP	FRE 602; Compound; Argumentative	
129	7	129	8	BP	FRE 602; Compound; Argumentative	
129	9	129	12	BP	FRE 602	
129	15	129	15	BP	FRE 602	
132	20	133	5	BP	FRE 602	
134	1	134	5	BP	FRE 602	
134	15	134	19	BP	FRE 602	
134	22	135	3	BP	FRE 602	
135	6	135	23	BP	FRE 602	
135	25	136	2	BP	FRE 602	
136	14	136	24	BP	FRE 602	
140	3	140	4	BP	FRE 602	
140	6	140	6	BP	FRE 602	
140	13	140	16	BP	FRE 602	
140	18	140	18	BP	FRE 602	
140	19	140	24	BP	701; 602	
141	1	141	9	BP	701; 602	
149	19	150	5	BP	FRE 602	
150	8	150	23	BP	FRE 602	
151	1	151	3	BP	FRE 602	
151	4	151	8	BP	FRE 602	
151	11	151	12	BP	FRE 602	

154	1	154	5	BP	Misstates the Record; Argumentative	
154	7	154	8	BP	Misstates the Record	
157	2	157	5	BP	Inadmissible by Statute	
158	15	158	22	BP	Misstates the Record; Compound	
158	24	159	2	BP	Misstates the Record; Compound	
159	21	160	5	BP	FRE 602	
170	5	170	7	BP	FRE 602; Compound	
170	9	170	12	BP	FRE 602; Compound	
171	14	171	19	BP	Misstates the Record; Argumentative	
171	21	171	22	BP	Misstates the Record; Argumentative	
172	6	172	11	BP	Misstates the Record; Compound	
172	14	172	19	BP	Misstates the Record	
172	21	172	21	BP	Misstates the Record	
172	23	172	24	BP	Misstates the Record	
172	25	173	2	BP	Colloquy	
173	3	173	19	BP	FRE 602	
176	11	176	12	BP	FRE 602	
176	14	176	23	BP	FRE 602	
177	1	177	2	BP	FRE 602	
177	21	178	1	BP	FRE 602	
178	5	178	6	BP	FRE 602	
179	5	179	6	BP	FRE 602	
179	8	179	11	BP	FRE 602	
179	12	179	13	BP	FRE 602	
179	15	179	16	BP	FRE 602	
179	19	179	22	BP	FRE 602	
180	4	180	10	BP	FRE 602	
181	1	181	1	BP	FRE 602; Misstates the Record	
181	3	181	4	BP	FRE 602; Misstates the Record	
181	5	181	14	BP	FRE 602	
181	15	181	16	BP	FRE 602; Misstates the Record	
181	18	181	21	BP	FRE 602; Misstates the Record	
182	6	182	8	BP	Improper Impeachment	
182	10	182	16	BP	Improper Impeachment	
182	17	183	1	BP	FRE 602	
185	10	185	17	BP	Improper Impeachment	
187	13	187	18	BP	Misstates the Record	

187	20	187	20	BP	Misstates the Record	
188	6	193	8	HESI	Relevance: Little is being asked about correspondence relating to Sperry Sun down hole tool failures, none of which are implicated in this case. There are no allegations that Sperry Sun down hole tool failures in any way contributed to or caused the blowout.	
194	12	194	22	BP	Misstates the Record	
195	1	195	2	BP	Misstates the Record	
200	2	200	8	BP	FRE 602; Misstates the Record	
200	10	200	10	BP	FRE 602; Misstates the Record	
200	20	201	10	BP	FRE 602	
207	7	207	14	BP	FRE 602	
208	9	208	17	BP	FRE 602; FRE 701	
210	4	210	9	BP	FRE 602	
210	12	210	13	BP	FRE 602	
211	3	211	14	BP	FRE 602; Compound	
213	10	213	16	BP	FRE 602	
213	17	213	19	BP	FRE 602; Compound	
213	21	213	22	BP	FRE 602; Compound	
213	23	214	11	BP	FRE 602	
214	15	214	16	BP	FRE 602	
215	11	216	7	BP	FRE 602	
216	9	216	14	BP	FRE 602	
217	17	217	18	BP	Misstates the Record	
217	20	217	23	BP	Misstates the Record	
217	24	218	8	BP	FRE 602	
218	13	218	14	BP	FRE 602	
229	19	230	9	BP	Relevance	
232	23	233	2	BP	Relevance	
237	7	237	14	BP	FRE 602; Compound	
237	18	237	22	BP	FRE 602; Compound	
237	25	238	8	BP	FRE 602; Vague	
243	1	243	9	BP	Relevance	
243	17	243	24	BP	FRE 602	
245	3	245	16	BP	FRE 602; FRE 701; Compound	
245	18	245	21	BP	FRE 602; FRE 701; Compound	
246	10	246	13	BP	FRE 602; FRE 701; Compound	
246	15	246	15	BP	FRE 602; FRE 701; Compound	

252	2	252	4	BP	FRE 602; FRE 701	
252	6	252	11	BP	FRE 602	
261	3	261	8	BP	FRE 701; Compound	
261	10	261	15	BP	FRE 701	
261	17	261	18	BP	FRE 701	
261	19	261	24	BP	FRE 701	
262	15	262	23	BP	Colloquy	
276	20	276	22	BP	FRE 602	
276	24	276	25	BP	FRE 602	
277	25	278	14	BP	FRE 602	
278	15	279	20	BP	Relevance	
280	10	280	25	BP	Compound; Misstates the Record	
283	21	283	25	BP	FRE 602; Misstates the Record	
284	2	284	2	BP	FRE 602; Misstates the Record	
285	12	286	12	BP	Relevance	
286	13	286	25	BP	FRE 602	
288	16	288	18	BP	FRE 602; Misstates the Record	
288	20	288	20	BP	FRE 602; Misstates the Record	
288	21	288	22	BP	FRE 602	
288	24	288	24	BP	FRE 602	
288	25	289	1	BP	FRE 602	
289	18	289	22	BP	FRE 602	
289	23	290	1	BP	FRE 602	
290	15	292	14	BP	FRE 602; Relevance	
292	15	292	17	BP	FRE 602	
292	19	293	10	BP	FRE 602	
293	11	294	9	BP	FRE 602	
294	10	294	20	BP	FRE 602	
294	22	294	22	BP	FRE 602	
315	4	315	15	BP	Relevance; Hearsay; FRE 602	
315	17	315	18	BP	Relevance; Hearsay; FRE 602	
315	23	316	2	BP	Relevance; Hearsay; FRE 602	
316	5	316	7	BP	Relevance; Hearsay; FRE 602	
317	1	317	7	BP	Relevance; FRE 602	
317	16	317	20	BP	Relevance; FRE 602	
317	21	318	21	BP	Relevance; FRE 602	
318	23	318	24	BP	Relevance; FRE 602	
322	1	322	3	BP	Relevance	
322	5	322	5	BP	Relevance	
329	24	330	15	BP	FRE 602; Relevance	

335	13	335	17	BP	701; Misstates the Record	
335	19	336	3	BP	FRE 701	
337	25	338	3	BP	FRE 602	
338	6	338	7	BP	FRE 602	
338	24	339	4	BP	FRE 602; Compound; Hearsay	
339	7	339	15	BP	FRE 602; Compound; Hearsay	
339	16	339	22	BP	FRE 701; FRE 602; Compound	
339	25	340	1	BP	FRE 701; FRE 602; Compound	
341	24	342	3	BP	FRE 602; Hearsay	
342	5	342	5	BP	FRE 602; Hearsay	
343	12	343	17	BP	FRE 701; Hearsay	
343	20	343	21	BP	FRE 701; Hearsay	
345	17	345	21	BP	Misstates the Record	
345	24	345	25	BP	Misstates the Record	
348	24	349	11	HESI	Non-responsive/ Speculation/Lacks Foundation: Little is asked whether he has ever heard that crane movement can interfere with a mudlogger's ability to read flow in/flow out data. He responds by initially stating, "I'm not aware" and then proceeds to speculate as to what mudloggers should take into account in their monitoring duties. Everything after "I'm not aware" is, therefore, non-responsive. Additionally, there is no testimony indicating that Little has the requisite knowledge to determine what considerations mud loggers should entertain while performing their monitoring responsibilities.	
350	3	350	8	BP	Hearsay; Compound	
350	11	350	18	BP	Hearsay; Compound	
355	8	355	22	BP	FRE 602	
358	7	358	20	BP	Compound	
358	23	359	1	BP	Compound	

358	6	359	1	HESI	Compound/Vague and Ambiguous/Speculation/Lack of Foundation: Little is asked a series of questions about who had interaction with Jesse Gagliano regarding the cement slurry tests. Little responds by speculating as to who would have had such interactions. Little left his position in the Gulf of Mexico on April 2, 2010 (356:11-13) and prior to that was transitioning to his new role in Africa (319:6-16). During that time he was not monitoring the day to day details of the Deepwater Horizon or the Macondo well (641:11-21).	
361	1	361	5	BP	FRE 701	
361	7	361	9	BP	FRE 701	
361	14	361	17	BP	FRE 701	
361	20	361	24	BP	FRE 701	
361	1	361	13	HESI	Non-responsive/Lack of Foundation/Vague and Ambiguous: Little is asked whether BP should proceed with a cement job without "test results" and he responds that the cement job should be agreed. Further, there is no evidence in the record to suggest that Little has the requisite skill and/or knowledge to answer questions relating to nitrified foam cement. Finally, the attorney posing the question never specifies for which type of "test results" he is referring.	
372	16	374	4	BP	FRE 701; Vague	
376	9	376	11	BP	Misstates the Record	
376	13	376	13	BP	Misstates the Record	
376	14	376	15	BP	Misstates the Record	
376	18	376	18	BP	Misstates the Record	
376	19	376	21	BP	Misstates the Record	
376	23	376	24	BP	Misstates the Record	
377	1	377	1	BP	Misstates the Record	
386	3	386	14	BP	FRE 602	
386	15	386	16	BP	FRE 602	

387	5	387	17	BP	Relevance	
389	10	389	23	BP	Relevance	
390	24	391	1	BP	Relevance	
391	22	391	25	BP	Misstates the Record	
392	3	392	4	BP	Misstates the Record	
392	18	392	25	BP	FRE 602	
394	21	395	4	BP	Relevance	
396	10	396	14	BP	FRE 602	
396	16	396	19	BP	FRE 602	
396	20	397	4	BP	Relevance	
399	4	399	7	BP	FRE 602	
399	9	399	9	BP	FRE 602	
399	14	399	19	BP	FRE 602	
400	5	400	7	BP	FRE 602	
402	11	402	13	BP	FRE 602	
402	15	402	16	BP	FRE 602	
405	12	405	17	BP	FRE 602	
406	17	406	21	BP	Relevance	
413	5	413	10	BP	Hearsay	
413	13	413	14	BP	Hearsay	
414	5	414	7	BP	Hearsay	
414	10	414	12	BP	Hearsay	
421	8	421	10	BP	Relevance	
421	13	421	25	BP	Relevance	
422	4	422	4	BP	Relevance	
422	5	422	10	BP	FRE 602	
422	12	422	15	BP	FRE 602	
422	19	422	21	BP	Relevance	
425	21	426	2	BP	FRE 701	
426	5	426	8	BP	FRE 701	
426	16	426	20	BP	FRE 602	
426	23	426	24	BP	FRE 602	
427	9	427	23	BP	FRE 602	
428	14	428	19	BP	FRE 602	
428	20	428	23	BP	FRE 602	
435	19	435	23	BP	FRE 602; Misstates the Record	
435	25	436	1	BP	FRE 602; Misstates the Record	
436	19	437	10	BP	FRE 602	
439	6	439	8	BP	FRE 701	
439	10	439	12	BP	FRE 701; FRE 407	

456	5	456	11	BP	FRE 602	
465	15	466	12	BP	FRE 602	
466	18	467	8	BP	FRE 602; Relevance	
467	9	467	25	BP	FRE 602	
468	5	468	10	BP	FRE 602	
468	11	468	14	BP	FRE 602; Hearsay	
468	17	468	17	BP	FRE 602; Hearsay	
468	19	468	19	BP	FRE 602; Hearsay	
468	20	468	23	BP	FRE 602; Improper Impeachment; Argumentative	
468	25	469	1	BP	FRE 602; Improper Impeachment; Argumentative	
469	4	469	5	BP	FRE 602; Improper Impeachment; Argumentative	
469	6	469	12	BP	FRE 602	
469	15	470	3	BP	FRE 602	
470	4	470	6	BP	FRE 602; Hearsay	
470	9	470	10	BP	FRE 602; Hearsay	
470	13	470	21	BP	FRE 602; Hearsay	
470	24	470	25	BP	FRE 602; Hearsay	
472	3	472	12	BP	Relevance	
473	13	474	3	BP	Relevance	
478	1	478	3	BP	Asked and Answered	
478	5	478	6	BP	Asked and Answered	
478	7	478	17	BP	Compound; Argumentative; Asked	
478	20	479	3	BP	Compound; Argumentative	
479	5	479	11	BP	Compound; Argumentative; Asked	
483	5	483	7	BP	Misstates the Record	
483	11	483	13	BP	Misstates the Record	
483	24	484	3	BP	Relevance	
484	6	484	7	BP	Relevance	
484	8	484	22	BP	FRE 602	
486	3	486	8	BP	Misstates the record; Argumentative; Asked and answered	
486	12	486	15	BP	Asked and Answered	
486	19	486	23	BP	Asked and Answered	
487	13	487	14	BP	Asked and Answered	
487	18	487	19	BP	Asked and Answered	
488	11	488	14	BP	Misstates the Record; Asked and Answered	

488	16	488	18	BP	Misstates the Record; Asked and Answered	
488	23	489	5	BP	Asked and Answered	
489	7	489	7	BP	Asked and Answered	
489	9	489	10	BP	Asked and Answered	
489	13	489	13	BP	Asked and Answered	
491	14	491	16	BP	Misstates the Record; Asked and Answered	
491	18	491	20	BP	Misstates the Record; Asked and Answered	
495	9	495	16	BP	Relevance	
500	11	500	24	BP	FRE 602	
502	2	502	14	BP	Relevance	
502	16	503	10	BP	Relevance	
504	3	504	10	BP	Hearsay; Misstates the Record	
504	13	504	14	BP	Hearsay; Misstates the Record	
504	15	504	19	BP	FRE 602	
505	10	505	19	BP	FRE 602; Relevance	
505	20	506	7	BP	FRE 602	
506	9	506	10	BP	FRE 602	
506	11	506	18	BP	Relevance	
506	21	506	22	BP	Relevance	
519	1	519	9	BP	Inadmissible by Statute	
524	6	524	14	BP	Inadmissible by Statute	
524	15	525	3	BP	Inadmissible by Statute; Hearsay	
525	9	525	12	BP	Inadmissible by Statute; Hearsay	
525	13	525	25	BP	FRE 602; Hearsay	
526	1	526	3	BP	FRE 701; FRE 602; Hearsay	
526	6	526	7	BP	FRE 701; FRE 602; Hearsay	
526	8	526	12	BP	FRE 701; FRE 602; Hearsay	
526	15	526	22	BP	FRE 701; FRE 602; Hearsay	
526	24	527	1	BP	FRE 701; FRE 602; Hearsay	
531	21	531	22	BP	FRE 404; Relevance; Prejudice	
531	24	532	5	BP	FRE 404; Relevance; Prejudice	
535	1	535	6	BP	Hearsay	
535	7	535	14	BP	Hearsay	
537	24	538	8	BP	FRE 602	
538	11	538	16	BP	FRE 602	
538	17	538	22	BP	Hearsay	
538	24	539	6	BP	Hearsay	

539	8	539	8	BP	Hearsay	
539	9	539	15	BP	Hearsay	
539	10	539	15	BP	Hearsay	
539	17	539	21	BP	Hearsay	
544	11	544	13	BP	Misstates the Record	
544	15	544	17	BP	Misstates the Record	
547	10	547	14	BP	Hearsay	
547	16	547	16	BP	Hearsay	
559	2	559	6	BP	FRE 701	
559	8	559	10	BP	FRE 701	
559	12	559	14	BP	FRE 701	
560	12	560	17	BP	FRE 602	
561	20	561	24	BP	Hearsay	
562	7	562	10	BP	701; Hearsay	
562	12	562	12	BP	FRE 701; Hearsay	
569	6	569	14	BP	FRE 701	
569	17	569	19	BP	FRE 701	
570	1	570	8	BP	Relevance	
570	9	570	24	BP	FRE 602	
570	25	571	19	BP	FRE 602	
572	2	572	3	BP	FRE 602	
572	5	572	6	BP	FRE 602	
572	7	573	8	BP	FRE 602	
573	11	573	14	BP	FRE 602	
576	1	576	2	BP	FRE 602; FRE 701	
576	5	576	7	BP	FRE 602; FRE 701	
576	14	576	16	BP	FRE 602; FRE 701	
576	18	576	18	BP	FRE 602; FRE 701	
576	25	577	3	BP	FRE 602; FRE 701	
577	5	577	6	BP	FRE 602; FRE 701	
577	12	577	13	BP	FRE 602; FRE 701	
577	16	577	18	BP	FRE 602; FRE 701	
577	24	578	2	BP	FRE 602; FRE 701	
578	7	578	7	BP	FRE 602; FRE 701	
578	8	578	10	BP	Asked and Answered; FRE 602; FRE 701	
578	13	578	16	BP	Asked and Answered; FRE 602; FRE 701	
578	19	578	25	BP	FRE 602	
579	2	579	7	BP	FRE 602	

579	12	579	22	BP	FRE 602	
579	24	580	3	BP	FRE 602	
580	4	580	23	BP	FRE 602	
581	1	581	8	BP	FRE 602	
581	9	582	1	BP	FRE 602	
582	14	582	20	BP	FRE 602	
585	5	585	8	BP	Misstates the Record	
585	10	585	11	BP	Misstates the Record	
587	10	587	17	BP	FRE 701	
595	8	595	13	BP	Hearsay	
595	14	595	16	BP	FRE 602	
602	8	602	9	BP	Misstates the Record	
602	11	602	13	BP	Misstates the Record	
602	14	602	17	BP	FRE 602	
602	18	603	6	BP	FRE 602	
629	7	629	9	BP	FRE 602	
629	15	629	15	BP	FRE 602	
629	25	630	2	BP	FRE 602; FRE 701	
630	5	630	5	BP	FRE 602; FRE 701	
634	22	635	2	BP	Misstates the Record	
635	4	635	4	BP	Misstates the Record	
642	25	643	2	BP	Misstates the Record	
643	4	643	5	BP	Misstates the Record	
643	17	644	2	BP	Misstates the Record; FRE 602	
644	5	644	7	BP	Misstates the Record; FRE 602	
647	16	647	19	BP	Asked and Answered	
647	22	648	3	BP	Asked and Answered	
648	7	648	7	BP	Asked and Answered	
648	13	648	15	BP	Asked and Answered	
648	25	649	3	BP	Asked and Answered	
649	11	649	12	BP	Colloquy	
649	13	649	15	BP	Asked and Answered	
649	17	649	21	BP	Asked and Answered	
649	24	650	1	BP	Asked and Answered	
650	3	650	5	BP	Asked and Answered	
655	4	655	8	BP	FRE 602	
655	13	655	20	BP	FRE 602	
655	22	656	6	BP	FRE 602	
656	9	656	9	BP	FRE 602	
658	22	658	25	BP	FRE 602	

659	3	659	3	BP	FRE 602	
661	2	661	8	BP	FRE 602; Compound; Argumentative	
661	11	661	12	BP	FRE 602; Compound; Argumentative	
662	15	662	25	BP	FRE 602; Compound; Argumentative	
663	4	663	4	BP	FRE 602; Compound; Argumentative	