

¹ The BP Parties consists of BP Exploration & Production Inc., BP America Production Company, and BP p.l.c.

6. are inconsistent with the Court's many rulings to date concerning the relevance or discoverability of documents or information, any undue prejudice that may result from the use or reference to documents or information, or the privileged nature of any documents or information;
7. are inconsistent with any of the pending motions filed by BP or that may be filed by BP in accordance with the Court-ordered schedule for the presentation of pre-trial evidentiary issues via motions in limine or so-called *Daubert* motions; or
8. relate to issues reserved by the Court for determination during later trial Phases, including Phases II and III.

To the extent that the BP Parties have provided counter-designations or affirmative designations regarding the foregoing subject matters or any other matter objected to by the BP Parties in their specific page/line objections to other parties' designations, such designations by the BP Parties are contingent on, subject to, and without waiver of the BP Parties' specific and general objections.

Respectfully submitted,

/s/ J. Andrew Langan

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