

**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**  
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\* **JUDGE BARBIER**  
\* **MAGISTRATE SHUSHAN**

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**ALL PARTIES OBJECTIONS TO DEPOSITION DESIGNATIONS OF  
JAMES INGRAM**

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<u>From</u>		<u>To</u>		<u>Objecting Party</u>	<u>Objection</u>	<u>Ruling</u>
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15	13	15	14	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
15	17	15	23	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
16	25	17	5	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
20	3	20	12	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
21	17	21	23	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	

21	24	22	21	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
23	9	23	17	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
24	3	25	20	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
25	21	26	15	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
26	25	27	13	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
28	12	29	1	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
29	5	30	6	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
31	18	32	8	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
37	20	43	9	Transocean	Lacks foundation (Fed. R. Evid. 602). No adverse inference against Transocean should be drawn.	

45	22	51	3	Transocean	Lacks foundation; calls for speculation (Fed. R. Evid. 602). No adverse inference against Transocean should be drawn.	
47	14	47	17	M-I	<p>This testimony should be stricken as not relevant under Federal Rule of Evidence 402. See Fed. R. Evid. 402.</p> <p>Additionally, no adverse inference should be imputed against M-I for this witness' invocation of the Fifth Amendment because this witness (1) is not a current or former employee of M-I, (2) was not under M-I's control, and (3) does not have compatible interests with M-I in this litigation. See <i>FDIC v. Fid. &amp; Deposit Co. of Md.</i>, 45 F.3d 969, 977-78 (5th Cir. 1995); see also <i>LiBuitti v. United States</i>, 107 F.3d 110, 123 (2nd Cir. 1997).</p> <p>Furthermore, there is no independent evidence to corroborate this adverse inference against M-I. See <i>State Farm Life Ins. Co. v. Gutterman</i>, 896 F.2d 116, 119 n.3 (5th Cir. 1990). Finally, imputing an adverse inference from this unaffiliated, third-party witness to M-I would be significantly more prejudicial than probative under Federal Rule of Evidence 403. See Fed. R. Evid. 403.</p>	

47	19	47	19	M-I	<p>This testimony should be stricken as not relevant under Federal Rule of Evidence 402. See Fed. R. Evid. 402.</p> <p>Additionally, no adverse inference should be imputed against M-I for this witness' invocation of the Fifth Amendment because this witness (1) is not a current or former employee of M-I, (2) was not under M-I's control, and (3) does not have compatible interests with M-I in this litigation. See <i>FDIC v. Fid. &amp; Deposit Co. of Md.</i>, 45 F.3d 969, 977-78 (5th Cir. 1995); see also <i>LiBuitti v. United States</i>, 107 F.3d 110, 123 (2nd Cir. 1997).</p> <p>Furthermore, there is no independent evidence to corroborate this adverse inference against M-I. See <i>State Farm Life Ins. Co. v. Gutterman</i>, 896 F.2d 116, 119 n.3 (5th Cir. 1990). Finally, imputing an adverse inference from this unaffiliated, third-party witness to M-I would be significantly more prejudicial than probative under Federal Rule of Evidence 403. See Fed. R. Evid. 403.</p>	
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49	16	49	20	M-I	<p>This testimony should be stricken as not relevant under Federal Rule of Evidence 402. See Fed. R. Evid. 402. Additionally, no adverse inference should be imputed against M-I for this witness' invocation of the Fifth Amendment because this witness (1) is not a current or former employee of M-I, (2) was not under M-I's control, and (3) does not have compatible interests with M-I in this litigation. See <i>FDIC v. Fid. &amp; Deposit Co. of Md.</i>, 45 F.3d 969, 977-78 (5th Cir. 1995); see also <i>LiBuitti v. United States</i>, 107 F.3d 110, 123 (2nd Cir. 1997). Furthermore, there is no independent evidence to corroborate this adverse inference against M-I. See <i>State Farm Life Ins. Co. v. Gutterman</i>, 896 F.2d 116, 119 n.3 (5th Cir. 1990). Finally, imputing an adverse inference from this unaffiliated, third-party witness to M-I would be significantly more prejudicial than probative under Federal Rule of Evidence 403. See Fed. R. Evid. 403.</p>	
49	16	49	22	BP	<p>FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment</p>	

49	22	49	22	M-I	<p>This testimony should be stricken as not relevant under Federal Rule of Evidence 402. See Fed. R. Evid. 402.</p> <p>Additionally, no adverse inference should be imputed against M-I for this witness' invocation of the Fifth Amendment because this witness (1) is not a current or former employee of M-I, (2) was not under M-I's control, and (3) does not have compatible interests with M-I in this litigation. See <i>FDIC v. Fid. &amp; Deposit Co. of Md.</i>, 45 F.3d 969, 977-78 (5th Cir. 1995); see also <i>LiBuitti v. United States</i>, 107 F.3d 110, 123 (2nd Cir. 1997).</p> <p>Furthermore, there is no independent evidence to corroborate this adverse inference against M-I. See <i>State Farm Life Ins. Co. v. Gutterman</i>, 896 F.2d 116, 119 n.3 (5th Cir. 1990). Finally, imputing an adverse inference from this unaffiliated, third-party witness to M-I would be significantly more prejudicial than probative under Federal Rule of Evidence 403. See Fed. R. Evid. 403.</p>	
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50	4	50	8	M-I	<p>This testimony should be stricken as not relevant under Federal Rule of Evidence 402. See Fed. R. Evid. 402. Additionally, no adverse inference should be imputed against M-I for this witness' invocation of the Fifth Amendment because this witness (1) is not a current or former employee of M-I, (2) was not under M-I's control, and (3) does not have compatible interests with M-I in this litigation. See <i>FDIC v. Fid. &amp; Deposit Co. of Md.</i>, 45 F.3d 969, 977-78 (5th Cir. 1995); see also <i>LiBuitti v. United States</i>, 107 F.3d 110, 123 (2nd Cir. 1997). Furthermore, there is no independent evidence to corroborate this adverse inference against M-I. See <i>State Farm Life Ins. Co. v. Gutterman</i>, 896 F.2d 116, 119 n.3 (5th Cir. 1990). Finally, imputing an adverse inference from this unaffiliated, third-party witness to M-I would be significantly more prejudicial than probative under Federal Rule of Evidence 403. See Fed. R. Evid. 403.</p>	
50	4	50	8	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
50	13	51	3	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	

67	13	67	19	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
67	23	67	24	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
68	12	69	1	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment; Misstates the Record	
69	8	69	13	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment; Misstates the Record	
69	19	70	3	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment; Misstates the Record	



70	21	70	25	M-I	<p>This testimony should be stricken as not relevant under Federal Rule of Evidence 402. See Fed. R. Evid. 402. Additionally, no adverse inference should be imputed against M-I for this witness' invocation of the Fifth Amendment because this witness (1) is not a current or former employee of M-I, (2) was not under M-I's control, and (3) does not have compatible interests with M-I in this litigation. See <i>FDIC v. Fid. &amp; Deposit Co. of Md.</i>, 45 F.3d 969, 977-78 (5th Cir. 1995); see also <i>LiBuitti v. United States</i>, 107 F.3d 110, 123 (2nd Cir. 1997). Furthermore, there is no independent evidence to corroborate this adverse inference against M-I. See <i>State Farm Life Ins. Co. v. Gutterman</i>, 896 F.2d 116, 119 n.3 (5th Cir. 1990). Finally, imputing an adverse inference from this unaffiliated, third-party witness to M-I would be significantly more prejudicial than probative under Federal Rule of Evidence 403. See Fed. R. Evid. 403.</p>	
70	21	71	25	BP	<p>FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment; Misstates the Record</p>	

71	2	71	2	M-I	<p>This testimony should be stricken as not relevant under Federal Rule of Evidence 402. See Fed. R. Evid. 402.</p> <p>Additionally, no adverse inference should be imputed against M-I for this witness' invocation of the Fifth Amendment because this witness (1) is not a current or former employee of M-I, (2) was not under M-I's control, and (3) does not have compatible interests with M-I in this litigation. See <i>FDIC v. Fid. &amp; Deposit Co. of Md.</i>, 45 F.3d 969, 977-78 (5th Cir. 1995); see also <i>LiBuitti v. United States</i>, 107 F.3d 110, 123 (2nd Cir. 1997).</p> <p>Furthermore, there is no independent evidence to corroborate this adverse inference against M-I. See <i>State Farm Life Ins. Co. v. Gutterman</i>, 896 F.2d 116, 119 n.3 (5th Cir. 1990). Finally, imputing an adverse inference from this unaffiliated, third-party witness to M-I would be significantly more prejudicial than probative under Federal Rule of Evidence 403. See Fed. R. Evid. 403.</p>	
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71	3	71	5	M-I	<p>This testimony should be stricken as not relevant under Federal Rule of Evidence 402. See Fed. R. Evid. 402.</p> <p>Additionally, no adverse inference should be imputed against M-I for this witness' invocation of the Fifth Amendment because this witness (1) is not a current or former employee of M-I, (2) was not under M-I's control, and (3) does not have compatible interests with M-I in this litigation. See <i>FDIC v. Fid. &amp; Deposit Co. of Md.</i>, 45 F.3d 969, 977-78 (5th Cir. 1995); see also <i>LiBuitti v. United States</i>, 107 F.3d 110, 123 (2nd Cir. 1997).</p> <p>Furthermore, there is no independent evidence to corroborate this adverse inference against M-I. See <i>State Farm Life Ins. Co. v. Gutterman</i>, 896 F.2d 116, 119 n.3 (5th Cir. 1990). Finally, imputing an adverse inference from this unaffiliated, third-party witness to M-I would be significantly more prejudicial than probative under Federal Rule of Evidence 403. See Fed. R. Evid. 403.</p>	
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71	7	71	9	M-I	<p>This testimony should be stricken as not relevant under Federal Rule of Evidence 402. See Fed. R. Evid. 402.</p> <p>Additionally, no adverse inference should be imputed against M-I for this witness' invocation of the Fifth Amendment because this witness (1) is not a current or former employee of M-I, (2) was not under M-I's control, and (3) does not have compatible interests with M-I in this litigation. See <i>FDIC v. Fid. &amp; Deposit Co. of Md.</i>, 45 F.3d 969, 977-78 (5th Cir. 1995); see also <i>LiBuitti v. United States</i>, 107 F.3d 110, 123 (2nd Cir. 1997).</p> <p>Furthermore, there is no independent evidence to corroborate this adverse inference against M-I. See <i>State Farm Life Ins. Co. v. Gutterman</i>, 896 F.2d 116, 119 n.3 (5th Cir. 1990). Finally, imputing an adverse inference from this unaffiliated, third-party witness to M-I would be significantly more prejudicial than probative under Federal Rule of Evidence 403. See Fed. R. Evid. 403.</p>	
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71	11	71	11	M-I	<p>This testimony should be stricken as not relevant under Federal Rule of Evidence 402. See Fed. R. Evid. 402. Additionally, no adverse inference should be imputed against M-I for this witness' invocation of the Fifth Amendment because this witness (1) is not a current or former employee of M-I, (2) was not under M-I's control, and (3) does not have compatible interests with M-I in this litigation. See <i>FDIC v. Fid. &amp; Deposit Co. of Md.</i>, 45 F.3d 969, 977-78 (5th Cir. 1995); see also <i>LiBuitti v. United States</i>, 107 F.3d 110, 123 (2nd Cir. 1997). Furthermore, there is no independent evidence to corroborate this adverse inference against M-I. See <i>State Farm Life Ins. Co. v. Gutterman</i>, 896 F.2d 116, 119 n.3 (5th Cir. 1990). Finally, imputing an adverse inference from this unaffiliated, third-party witness to M-I would be significantly more prejudicial than probative under Federal Rule of Evidence 403. See Fed. R. Evid. 403.</p>	
81	9	84	5	Transocean	Lack of foundation (Fed. R. Evid. 602). No adverse inference against Transocean should be drawn.	
84	5	85	22	Transocean	Lacks foundation (Fed. R. Evid. 602); Hearsay (Fed. R. Evid. 802). No adverse inference against Transocean should be drawn.	

91	2	91	6	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment; Misstates the Record	
91	17	92	4	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment; Misstates the Record	
92	11	92	15	M-I	<p>This testimony should be stricken as not relevant under Federal Rule of Evidence 402. See Fed. R. Evid. 402. Additionally, no adverse inference should be imputed against M-I for this witness' invocation of the Fifth Amendment because this witness (1) is not a current or former employee of M-I, (2) was not under M-I's control, and (3) does not have compatible interests with M-I in this litigation. See <i>FDIC v. Fid. &amp; Deposit Co. of Md.</i>, 45 F.3d 969, 977-78 (5th Cir. 1995); see also <i>LiBuitti v. United States</i>, 107 F.3d 110, 123 (2nd Cir. 1997).</p> <p>Furthermore, there is no independent evidence to corroborate this adverse inference against M-I. See <i>State Farm Life Ins. Co. v. Gutterman</i>, 896 F.2d 116, 119 n.3 (5th Cir. 1990). Finally, imputing an adverse inference from this unaffiliated, third-party witness to M-I would be significantly more prejudicial than probative under Federal Rule of Evidence 403. See Fed. R. Evid. 403.</p>	

92	11	93	3	BP	FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment; Misstates the Record	
92	17	92	22	M-I	<p>This testimony should be stricken as not relevant under Federal Rule of Evidence 402. See Fed. R. Evid. 402.</p> <p>Additionally, no adverse inference should be imputed against M-I for this witness' invocation of the Fifth Amendment because this witness (1) is not a current or former employee of M-I, (2) was not under M-I's control, and (3) does not have compatible interests with M-I in this litigation. See <i>FDIC v. Fid. &amp; Deposit Co. of Md.</i>, 45 F.3d 969, 977-78 (5th Cir. 1995); see also <i>LiBuitti v. United States</i>, 107 F.3d 110, 123 (2nd Cir. 1997).</p> <p>Furthermore, there is no independent evidence to corroborate this adverse inference against M-I. See <i>State Farm Life Ins. Co. v. Gutterman</i>, 896 F.2d 116, 119 n.3 (5th Cir. 1990). Finally, imputing an adverse inference from this unaffiliated, third-party witness to M-I would be significantly more prejudicial than probative under Federal Rule of Evidence 403. See Fed. R. Evid. 403.</p>	

92	24	93	1	M-I	<p>This testimony should be stricken as not relevant under Federal Rule of Evidence 402. See Fed. R. Evid. 402. Additionally, no adverse inference should be imputed against M-I for this witness' invocation of the Fifth Amendment because this witness (1) is not a current or former employee of M-I, (2) was not under M-I's control, and (3) does not have compatible interests with M-I in this litigation. See <i>FDIC v. Fid. &amp; Deposit Co. of Md.</i>, 45 F.3d 969, 977-78 (5th Cir. 1995); see also <i>LiBuitti v. United States</i>, 107 F.3d 110, 123 (2nd Cir. 1997). Furthermore, there is no independent evidence to corroborate this adverse inference against M-I. See <i>State Farm Life Ins. Co. v. Gutterman</i>, 896 F.2d 116, 119 n.3 (5th Cir. 1990). Finally, imputing an adverse inference from this unaffiliated, third-party witness to M-I would be significantly more prejudicial than probative under Federal Rule of Evidence 403. See Fed. R. Evid. 403.</p>	
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93	3	93	3	M-I	<p>This testimony should be stricken as not relevant under Federal Rule of Evidence 402. See Fed. R. Evid. 402. Additionally, no adverse inference should be imputed against M-I for this witness' invocation of the Fifth Amendment because this witness (1) is not a current or former employee of M-I, (2) was not under M-I's control, and (3) does not have compatible interests with M-I in this litigation. See <i>FDIC v. Fid. &amp; Deposit Co. of Md.</i>, 45 F.3d 969, 977-78 (5th Cir. 1995); see also <i>LiBuitti v. United States</i>, 107 F.3d 110, 123 (2nd Cir. 1997). Furthermore, there is no independent evidence to corroborate this adverse inference against M-I. See <i>State Farm Life Ins. Co. v. Gutterman</i>, 896 F.2d 116, 119 n.3 (5th Cir. 1990). Finally, imputing an adverse inference from this unaffiliated, third-party witness to M-I would be significantly more prejudicial than probative under Federal Rule of Evidence 403. See Fed. R. Evid. 403.</p>	
95	8	95	21	BP	<p>FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment; Misstates the Record</p>	