

**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  
CURTIS KUCHTA**

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<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>			
10	13	11	2	Transocean	Relevance, prejudice (Fed. R. Evid. 403); no adverse inference should be drawn against Transocean.	
11	10	11	21	Transocean	Inadmissible based on Court's ruling (Docket No. 5448; 46 U.S.C. § 6308); Lacks foundation (Fed. R. Evid. 602); Hearsay (Fed. R. Evid. 802); no adverse inference should be drawn against Transocean.	
11	11	11	21	BP	Inadmissible by Statute	
12	11	12	13	BP	Inadmissible by Statute	
12	11	12	24	Transocean	Inadmissible based on Court's ruling (Docket No. 5448; 46 U.S.C. § 6308); Counsel asks witness questions about his testimony from the joint US Coast Guard - MMS investigation. Lacks foundation (Fed. R. Evid. 602); Hearsay (Fed. R. Evid. 802); no adverse inference should be drawn	

					against Transocean.	
12	16	12	19	BP	Inadmissible by Statute	
12	22	12	24	BP	Inadmissible by Statute	
15	2	15	9	Transocean	Inadmissible based on Court's ruling (Docket No. 5448; 46 U.S.C. § 6308); Lacks foundation (Fed. R. Evid. 602); Hearsay (Fed. R. Evid. 802); no adverse inference should be drawn against Transocean.	
15	12	15	15	Transocean	Inadmissible based on Court's ruling (Docket No. 5448; 46 U.S.C. § 6308); Lacks foundation (Fed. R. Evid. 602); Hearsay (Fed. R. Evid. 802); no adverse inference should be drawn against Transocean.	
24	21	24	24	Transocean	Calls for speculation, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
25	2	25	6	Transocean	Calls for speculation, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
25	15	25	21	Transocean	Calls for speculation, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
25	24	26	9	Transocean	Assumes facts not in evidence, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
26	20	26	23	Transocean	Assumes facts not in evidence, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	

27	8	27	14	Transocean	Lacks foundation, calls for speculation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
28	5	28	12	Transocean	Calls for speculation, lacks foundation (Fed. R. Evid. 602), vague, ambiguous; no adverse inference should be drawn against Transocean.	
28	25	29	4	Transocean	Calls for speculation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
31	11	31	14	Transocean	Assumes facts not in evidence, calls for speculation, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
31	24	31	25	Transocean	Calls for speculation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
32	6	32	9	Transocean	Calls for speculation, lacks foundation (Fed.R.Evid. 602), argumentative; no adverse inference should be drawn against Transocean.	
32	17	32	20	Transocean	Assumes facts not in evidence, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
35	25	36	3	Transocean	Calls for speculation, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
36	17	36	18	Transocean	Calls for speculation, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	

41	8	41	11	Transocean	Calls for speculation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
53	15	53	17	Transocean	Vague, ambiguous; no adverse inference should be drawn against Transocean.	
54	6	54	12	Transocean	Calls for speculation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
57	4	57	6	BP	Relevance; FRE 602; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
57	12	57	15	BP	Relevance; vague; FRE 602; Inadmissible by Statute; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
57	12	57	15	Transocean	Inadmissible based on Court's ruling (Docket No. 5448; 46 U.S.C. § 6308); Lacks foundation (Fed. R. Evid. 602); Hearsay (Fed. R. Evid. 802); no adverse inference should be drawn against Transocean.	
62	10	62	14	Transocean	Calls for speculation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
62	17	62	20	Transocean	Calls for speculation, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
63	16	63	24	Transocean	Calls for speculation, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	

64	1	64	4	Transocean	Calls for speculation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
64	15	64	18	Transocean	Calls for speculation, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
64	21	65	12	Transocean	Calls for speculation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
67	13	67	17	Transocean	Calls for speculation, lacks foundation and to the extent that the question inquires about matters before the joint US Coast Guard - MMS investigation, is inadmissible based on Court's ruling (Docket No. 5448; 46 U.S.C. § 6308); (Fed. R. Evid. 602), Hearsay (Fed. R. Evid. 802); no adverse inference should be drawn against Transocean.	
67	19	68	1	BP	Inadmissible by Statute; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
67	19	68	1	Transocean	Inadmissible based on Court's ruling (Docket No. 5448; 46 U.S.C. § 6308); Lacks foundation (Fed. R. Evid. 602); Hearsay (Fed. R. Evid. 802); no adverse inference should be drawn against Transocean.	
69	23	70	1	BP	Inadmissible by Statute; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth	

					Amendment	
69	23	72	20	Transocean	Inadmissible based on Court's ruling (Docket No. 5448; 46 U.S.C. § 6308); Lacks foundation (Fed. R. Evid. 602); Hearsay (Fed. R. Evid. 802); no adverse inference should be drawn against Transocean.	
70	4	70	5	BP	Inadmissible by Statute; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
70	8	70	12	BP	Inadmissible by Statute; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
70	15	70	24	BP	Inadmissible by Statute; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
71	2	71	4	BP	Inadmissible by Statute; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
71	7	71	14	BP	Inadmissible by Statute; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
71	16	71	17	BP	Inadmissible by Statute; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	

71	20	72	5	BP	Inadmissible by Statute; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
72	8	72	20	BP	Inadmissible by Statute; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
75	2	75	5	Transocean	Calls for speculation, lacks foundation (Fed. R. Evid. 602); ; no adverse inference should be drawn against Transocean.	
75	12	75	17	Cameron	Lack of Foundation; Speculation (FRE 602); Prejudicial (FRE 403); Improper Opinion Testimony (FRE 701 and 702). Kuchta is a captain of a vessel, not a BOP expert. (Kuchta Depo at 103-104).	
75	18	76	3	Transocean	Calls for speculation, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
76	6	76	9	Transocean	Lacks foundation (Fed. R. Evid. 602); ; no adverse inference should be drawn against Transocean.	
76	11	76	19	Transocean	Calls for a legal conclusion; no adverse inference should be drawn against Transocean.	
77	2	77	4	Transocean	Vague, ambiguous and argumentative; no adverse inference should be drawn against Transocean.	
77	16	78	2	Transocean	Calls for speculation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	

85	6	85	17	Transocean	Calls for speculation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
86	2	86	9	Transocean	Calls for speculation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
94	7	94	9	Transocean	Calls for speculation, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
95	13	95	16	Transocean	Mischaracterization of evidence by counsel; no adverse inference should be drawn against Transocean.	
96	9	96	13	Transocean	Vague, ambiguous; no adverse inference should be drawn against Transocean.	
99	24	100	2	BP	Inadmissible by Statute	
99	24	100	8	Transocean	Inadmissible based on Court's ruling (Docket No. 5448; 46 U.S.C. § 6308); Lacks foundation (Fed. R. Evid. 602); Hearsay (Fed. R. Evid. 802); no adverse inference should be drawn against Transocean.	
100	6	100	8	BP	Inadmissible by Statute	
101	4	101	9	Transocean	Calls for speculation, lacks foundation (Fed. R. Evid. 602); no adverse inference should be drawn against Transocean.	
102	19	102	22	BP	Vague; misstates; Testimony not admissible against BP for any purpose based on the witness's invocation of the Fifth Amendment	
102	19	102	22	Transocean	Assumes facts not in evidence, lacks foundation (Fed. R. Evid. 602); no adverse inference should be	



					drawn against Transocean.	
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