

**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
MDL NO. 2179, SECTION J**

**ANADARKO’S GENERAL OBJECTION TO PHASE II DEPOSITION DESIGNATIONS
AND EXHIBITS RE SOURCE CONTROL**

Anadarko objects to the following as irrelevant to Phase II of the trial scheduled to begin on September 16, 2013:

- Any party’s designation of testimony and/or exhibits regarding source control efforts to the extent such testimony and/or exhibits are proffered by a party against Anadarko.

The Court’s motion *in limine* ruling in Phase I precludes the introduction of such testimony and/or exhibits for the purpose of proving that Anadarko is at fault and Anadarko intends to move *in limine* to exclude such testimony and/or exhibits from Phase II of the trial if meet and confer efforts do not produce a resolution which acknowledges the applicability of that prior ruling to Phase II. To the extent that Anadarko provides designations of testimony and/or exhibits regarding the foregoing subject matter, such designations are contingent on, subject to, and without waiver of Anadarko’s general objection described above.