

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

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IN RE: Oil Spill by the Oil Rig
“Deepwater Horizon” in the Gulf of Mexico,
On April 20, 2010

MDL No. 2179

SECTION: J

This Document Relates to:
No. 10-4536

JUDGE BARBIER

MAG. JUDGE SHUSHAN
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**BP EXPLORATION & PRODUCTION INC.’S DEPOSITION DESIGNATIONS AND
CONDITIONAL COUNTER DESIGNATIONS¹ FOR
DAVID RAINEY**

FROM		TO	
Page Number	Line Number	Page Number	Line Number
11	13	11	15
17	10	17	13
375	25	377	4
379	19	380	14
380	23	381	8

Date: November 17, 2014

Respectfully submitted,

/s/ J. Andrew Langan

Richard C. Godfrey, P.C.

Robert C. “Mike” Brock

J. Andrew Langan, P.C.

Hariklia Karis, P.C.

¹ BP Exploration & Production Inc. (BPXP) makes these designations subject to BPXP’s objections to testimony designated by other parties. BPXP reserves the right to withdraw some or all of these designations in the event BPXP’s objections or motions in *limine* directed to other parties’ designations are granted. BPXP further reserves the right to rely on any additional designations made by other parties. BPXP objects to the designation of testimony related to Phase 1 made by other parties as such testimony is irrelevant to this Penalty Phase. BPXP reserves its right to designate testimony related to Phase 1 and Phase 2 in the event the Court denies BPXP’s motion on prior incidents. BPXP will serve further objections in accordance with the schedule in the Court’s Order.

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