

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

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**IN RE: Oil Spill by the Oil Rig** : **MDL No. 2179**  
**“Deepwater Horizon” in the Gulf of Mexico,** :  
**On April 20, 2010** : **SECTION: J**  
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**This Document Relates to:** : **JUDGE BARBIER**  
**No. 10-4536** : **MAG. JUDGE SHUSHAN**  
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**BP EXPLORATION & PRODUCTION INC.’S DEPOSITION DESIGNATIONS AND  
CONDITIONAL COUNTER DESIGNATIONS<sup>1</sup> FOR  
NICK WATSON**

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Date: November 17, 2014

Respectfully submitted,

/s/ J. Andrew Langan  
Richard C. Godfrey, P.C.  
Robert C. “Mike” Brock  
J. Andrew Langan, P.C.

<sup>1</sup> 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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