

**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**  
\*  
\* **SECTION: J**  
\*  
\* **JUDGE BARBIER**  
\* **MAGISTRATE SHUSHAN**

\* \* \* \* \*

**ALL PARTIES OBJECTIONS TO DEPOSITION DESIGNATIONS OF  
DAMIAN HIGGINS**

| <u>From</u> |             | <u>To</u>   |             | <u>Objecting Party</u> | <u>Objection</u>  | <u>Ruling</u> |
|-------------|-------------|-------------|-------------|------------------------|---|---------------|
| <u>Page</u> | <u>Line</u> | <u>Page</u> | <u>Line</u> |                        |   |               |
| 39          | 4           | 39          | 7           | USDOJ                  | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |               |
| 39          | 9           | 39          | 15          | USDOJ                  | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |               |
| 39          | 17          | 39          | 22          | USDOJ                  | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |               |
| 39          | 24          | 40          | 8           | USDOJ                  | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |               |
| 40          | 23          | 41          | 17          | USDOJ                  | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |               |
| 41          | 20          | 41          | 23          | USDOJ                  | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates  |               |

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|----|----|----|----|-------|---|--|
|    |    |    |    |       | Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014)  |  |
| 41 | 25 | 42 | 1  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 42 | 3  | 42 | 11 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 42 | 14 | 42 | 16 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 42 | 17 | 42 | 20 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 42 | 23 | 43 | 6  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 43 | 9  | 43 | 16 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 43 | 18 | 44 | 3  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 44 | 6  | 44 | 6  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 44 | 19 | 45 | 10 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty   |  |

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|----|----|----|----|-------|---|--|
|    |    |    |    |       | Phase is not the NRD Phase<br>(March 31, 2014)  |  |
| 45 | 13 | 45 | 16 | USDOJ | Beyond the scope of 30(b)(6)<br>topic; Expert opinion; Violates<br>Judge Barbier's Order that Penalty<br>Phase is not the NRD Phase<br>(March 31, 2014) |  |
| 45 | 18 | 46 | 6  | USDOJ | Beyond the scope of 30(b)(6)<br>topic; Expert opinion; Violates<br>Judge Barbier's Order that Penalty<br>Phase is not the NRD Phase<br>(March 31, 2014) |  |
| 66 | 19 | 69 | 21 | USDOJ | Violates Judge Barbier's Order<br>that Penalty Phase is not the NRD<br>Phase (March 31, 2014)   |  |
| 74 | 5  | 74 | 8  | USDOJ | Beyond the scope of 30(b)(6)<br>topic; Expert opinion; Violates<br>Judge Barbier's Order that Penalty<br>Phase is not the NRD Phase<br>(March 31, 2014) |  |
| 74 | 12 | 74 | 20 | USDOJ | Beyond the scope of 30(b)(6)<br>topic; Expert opinion; Violates<br>Judge Barbier's Order that Penalty<br>Phase is not the NRD Phase<br>(March 31, 2014) |  |
| 74 | 23 | 74 | 24 | USDOJ | Beyond the scope of 30(b)(6)<br>topic; Expert opinion; Violates<br>Judge Barbier's Order that Penalty<br>Phase is not the NRD Phase<br>(March 31, 2014) |  |
| 76 | 8  | 76 | 11 | USDOJ | Violates Judge Barbier's Order<br>that Penalty Phase is not the NRD<br>Phase (March 31, 2014)   |  |
| 76 | 13 | 76 | 17 | USDOJ | Violates Judge Barbier's Order<br>that Penalty Phase is not the NRD<br>Phase (March 31, 2014)   |  |
| 76 | 19 | 76 | 23 | USDOJ | Violates Judge Barbier's Order<br>that Penalty Phase is not the NRD<br>Phase (March 31, 2014)   |  |
| 76 | 25 | 77 | 5  | USDOJ | Violates Judge Barbier's Order<br>that Penalty Phase is not the NRD<br>Phase (March 31, 2014)   |  |
| 77 | 7  | 77 | 7  | USDOJ | Violates Judge Barbier's Order<br>that Penalty Phase is not the NRD<br>Phase (March 31, 2014)   |  |
| 77 | 10 | 77 | 11 | USDOJ | Violates Judge Barbier's Order  |  |

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|    |    |    |    |       | that Penalty Phase is not the NRD Phase (March 31, 2014)  |  |
| 77 | 17 | 77 | 23 | USDOJ | Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014)   |  |
| 78 | 3  | 78 | 5  | USDOJ | Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014)   |  |
| 79 | 11 | 79 | 12 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 79 | 14 | 79 | 15 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 79 | 17 | 79 | 17 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 79 | 19 | 79 | 23 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 79 | 25 | 80 | 2  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 80 | 4  | 80 | 4  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 80 | 5  | 80 | 5  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 80 | 7  | 80 | 8  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty   |  |

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|----|----|----|----|-------|---|--|
|    |    |    |    |       | Phase is not the NRD Phase<br>(March 31, 2014)  |  |
| 80 | 10 | 80 | 15 | USDOJ | Beyond the scope of 30(b)(6)<br>topic; Expert opinion; Violates<br>Judge Barbier's Order that Penalty<br>Phase is not the NRD Phase<br>(March 31, 2014) |  |
| 80 | 17 | 80 | 24 | USDOJ | Beyond the scope of 30(b)(6)<br>topic; Expert opinion; Violates<br>Judge Barbier's Order that Penalty<br>Phase is not the NRD Phase<br>(March 31, 2014) |  |
| 81 | 1  | 81 | 10 | USDOJ | Violates Judge Barbier's Order<br>that Penalty Phase is not the NRD<br>Phase (March 31, 2014)   |  |
| 84 | 24 | 86 | 21 | USDOJ | Violates Judge Barbier's Order<br>that Penalty Phase is not the NRD<br>Phase (March 31, 2014)   |  |
| 87 | 2  | 89 | 5  | USDOJ | Violates Judge Barbier's Order<br>that Penalty Phase is not the NRD<br>Phase (March 31, 2014)   |  |
| 91 | 12 | 91 | 17 | USDOJ | Violates Judge Barbier's Order<br>that Penalty Phase is not the NRD<br>Phase (March 31, 2014)   |  |
| 91 | 20 | 91 | 21 | USDOJ | Violates Judge Barbier's Order<br>that Penalty Phase is not the NRD<br>Phase (March 31, 2014)   |  |
| 93 | 22 | 93 | 24 | USDOJ | Beyond the scope of 30(b)(6)<br>topic; Expert opinion; Violates<br>Judge Barbier's Order that Penalty<br>Phase is not the NRD Phase<br>(March 31, 2014) |  |
| 94 | 2  | 94 | 9  | USDOJ | Beyond the scope of 30(b)(6)<br>topic; Expert opinion; Violates<br>Judge Barbier's Order that Penalty<br>Phase is not the NRD Phase<br>(March 31, 2014) |  |
| 94 | 10 | 94 | 12 | USDOJ | Beyond the scope of 30(b)(6)<br>topic; Expert opinion; Violates<br>Judge Barbier's Order that Penalty<br>Phase is not the NRD Phase<br>(March 31, 2014) |  |
| 94 | 14 | 94 | 14 | USDOJ | Beyond the scope of 30(b)(6)<br>topic; Expert opinion; Violates<br>Judge Barbier's Order that Penalty<br>Phase is not the NRD Phase                     |  |

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|     |    |     |    |       | (March 31, 2014)  |  |
| 94  | 15 | 94  | 21 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 94  | 23 | 95  | 9  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 95  | 14 | 98  | 11 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 98  | 13 | 98  | 22 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 105 | 21 | 105 | 22 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 128 | 6  | 128 | 19 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 128 | 23 | 129 | 10 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 154 | 9  | 154 | 15 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 154 | 17 | 154 | 17 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |

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| 169 | 12 | 170 | 20 | USDOJ | Foundation; Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |
| 170 | 23 | 171 | 13 | USDOJ | Foundation; Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |
| 171 | 16 | 172 | 5  | USDOJ | Foundation; Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |
| 172 | 8  | 172 | 25 | USDOJ | Foundation; Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |
| 173 | 3  | 173 | 19 | USDOJ | Foundation; Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |
| 173 | 22 | 174 | 1  | USDOJ | Foundation; Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |
| 174 | 3  | 174 | 5  | USDOJ | Foundation; Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |
| 179 | 9  | 180 | 11 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014)             |
| 180 | 24 | 181 | 3  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014)             |
| 181 | 8  | 181 | 11 | USDOJ | Beyond the scope of 30(b)(6)  |

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|     |    |     |    |       | topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014)                              |  |
| 181 | 13 | 181 | 20 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 181 | 22 | 182 | 2  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 182 | 4  | 182 | 10 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 182 | 12 | 182 | 22 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 183 | 5  | 183 | 6  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 183 | 8  | 183 | 9  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 183 | 15 | 183 | 17 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 183 | 19 | 183 | 22 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 183 | 24 | 183 | 24 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates  |  |

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|     |    |     |    |       | Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014)  |  |
| 184 | 3  | 184 | 4  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 184 | 23 | 185 | 1  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 185 | 3  | 185 | 3  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 186 | 1  | 186 | 4  | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 186 | 6  | 186 | 15 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 186 | 17 | 186 | 21 | USDOJ | Beyond the scope of 30(b)(6) topic; Expert opinion; Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014) |  |
| 205 | 7  | 205 | 16 | USDOJ | Foundation  |  |
| 206 | 21 | 208 | 6  | USDOJ | Foundation  |  |
| 208 | 9  | 208 | 21 | USDOJ | Foundation  |  |
| 208 | 24 | 209 | 1  | USDOJ | Hearsay; Foundation   |  |
| 220 | 12 | 221 | 2  | USDOJ | Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014)   |  |
| 221 | 20 | 222 | 3  | USDOJ | Violates Judge Barbier's Order that Penalty Phase is not the NRD Phase (March 31, 2014)   |  |
| 222 | 5  | 222 | 5  | USDOJ | Foundation  |  |
| 222 | 7  | 222 | 9  | USDOJ | Foundation  |  |

