

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY.

JOHN C. DEPP, II,

Plaintiff and Counterclaim Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim Plaintiff.

Civil Action No.: CL-2019-0002911

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JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

**DEFENDANT AND COUNTERCLAIM PLAINTIFF AMBER LAURA HEARD'S
OBJECTIONS TO THE DEPOSITION DESIGNATIONS OF PLAINTIFF AND
COUNTERCLAIM DEFENDANT JOHN C. DEPP, II, AND COUNTER-
DESIGNATIONS OF DEPOSITION TESTIMONY FOR TRIAL**

COMES NOW the Defendant and Counterclaim Plaintiff, Amber Laura Heard, by counsel, and pursuant to the Scheduling Order issued in this case on April 22, 2021, and hereby objects to Plaintiff and Counterclaim Defendant John C. Depp, II's designation of deposition testimony for trial as follows, and counter-designates the following deposition testimony for trial.

All designations are subject to rulings on Motions *in Limine* and other rulings of the Court, and Defendant/Counterclaim Plaintiff reserves the right to modify or withdraw any designations based on rulings of the Court and/or other developments prior to or at trial.

Defendant and Counterclaim Plaintiff's Counter-Designations set forth below are in addition to the deposition testimony previously designated, and those previous designations are hereby incorporated by reference into these Counter-Designations.

KEY TO OBJECTIONS

R=Irrelevant or Immaterial; **H**=Hearsay; **F/A**=No Foundation or Authenticity; **MIL**=Currently the subject of Motions in Limine; **P**=Prejudice outweighs probative value; **D**=Document does not accurately and completely depict facts and events or is not authentic business document; **IC**=Document is incomplete; **S**=Settlement Communications; **SS**=Self-serving; **NP**=Not produced in discovery, although requested; **SP**=Speculative/Calls for Speculation; **L**=Leading; **AF**= Assumes Facts Not in Evidence; **C**= Compound; **IR**= Improper Use of Document/Attempt at Impeachment/Improper Attempt to Refresh Recollection; **MS**= Mischaracterizes/Misstates Testimony; **AA**=Asked and Answered; **O**=Designation of Objection; **UN**=Unresponsive.

Deposition of Laurel Anderson (February 21, 2022)

Objections to Plaintiff's Designations

Page/Line

Objections

52:8-16	O
60:13-21	UN; SP
61:6-16	UN (after "either")Go
61:20-62:21	H
63:13-19	O
65:14-66:13	H, O (66:2-7)
78:10-11	O
90:8-9, 16-17	O
94:19-22	O
95:1, 5-9	O
95:18-96:5	R, P, O (96:2-5)
98:4-99:9	H
99:17-19	O
100:15-101:8	H, O (100:21-22, 101:5-7)
101:13-102:2	H, O
102:3-21	H, O
103:11-104:5	H,O, SP
104:7-11	O
104:12-21	L
108:4-7	R, P
109:3-10	R, P, O
110:2-14	R, P
112:13-113:2	H, O
113:4-12	H, L, O
115:7-115:13	H, O
115:14-116:1	H, L, O
116:5-6	O
116:12-15	L

117:10-118:8	H, O
118:9-119:11	H, O
120:2-12	H, O
120:13-121:8	H, O
121:10-14	H
125:16-19	R, P
127:21-128:1	R, P
129:5-130:12	H, O
131:7-14	L
134:10-11	H, SP
134:12-135:4	SP, H, O
135:9-13	O
136:17-137:1	H
137:21-138:5	H, O
140:5-6	O
140:8-14	H, O
142:10-13	L
143:3-7	L, H, O
144:11-21	R, P
149:4-5	O
151:8-20	H, O
151:21-152:9	H, L, O
152:10-19	H, O
152:20-153:2	H, O
153:4-14	H, O
153:19-154:8	H, O, F, SP
154:11-16	H, O, F, SP
154:20-21	O
155:10-16	H, L, O
155:17-156:4	H, L, O, F
156:6-12	H, O, F
156:13-22	H, O, F
160:7-9	L
168:7-169:18	H, O
169:19-170:5	H, L, C, O
170:8-18	R, P
170:20-171:19	SP, VA, H, O
171:20-172:3	L, O
177:10-178:2	L, R, P, O
178:3-19	H, L, O
178:21-179:10	H, L, O
179:11-180:3	H, L, O
182:21-183:13	H, L, O
183:14-19	H, L, O
189:16-19	L, R, P

190:10-191:1	VA, L, O
201:11-18	O
202:20-203:4	O
210:16-19	L

Defendant's Counter-Designations of Laurel Anderson

Page Line

61	17-19
68	20 (from "did") - 22
69	1-7
104	22
105	1-2 [Replace "Exhibit 2" with Def Ex] 7-12
119	12-13, 15, 20 and 22
137	4-6 and 10-15
198	6-8 and 14-15
204	21-22
205	1-13
206	10-13 and 16-22
207	1-4

Deposition of Isaac Baruch (November 20, 2019)

Objections to Plaintiff's Designations

Page/Lines Objection

15:9-11	L
19:15-16	L
19:23 and 25	L
20:9-11	UN
20:13-17	UN
20:24-21:21	F (as to who Depp speaking to on phone)
21:3-5	UN
21:11-25	UN
21:11-15	H
21:17-18	H
21:18-19	SP, P
21:23-22:1	UN
22:1-17	F (as to who Depp speaking to on phone)
23:1-17	UN
23:4-8	H

23:9-17	P, SP
23:14-16	H
24:25-25:2	SP, P
25:2-17	UN
25:14-17	H
25:21-27:16	UN
26:3:4	H
26:6-23	H
26:11-22	P
27:1-8	H
27:14-16	H
28:17-19	L
28:21-23	S, UN
30:4-10	UN (except for "Yes. She was there")
35:11:16	IR
36:4-8	IR, F
40:23-41:1	H
41:10:11	H
41:16-19	H
41:23-25	H
41:10-42:25	UN
44:14-24	R
52:3-8	H
52:10-11	H
52:14-17	UN
53:18-19	MS
53:20-55:1	UN
54:11-19	H
56:22-24	H
57:9-11	UN
57:20-58:17	F, S
58:23-59:6	F, S
60:19	UN
60:20-61:5	F, S
65:11-13	UN (as to what witness saw on internet)
65:15-17	H
65::21-66:2	H
66:8-18	UN, R
69:6-8	L
69:25-70:3	F, S
70:9-11	L
70:19-23	UN
70:21-23	H
71:1-2	H
71:1-7	F/A

71:2-9	R
71:7-9	UN (starting from "And I'm....so insane")
77:11-12	L
77:11-18	IR
82:1-2	L
82:17-83:3	F
185:14-15	L
185:14-186:15	R
187:4-7	S, F

Defendant's Counter-Designations of Isaac Baruch

Page	Lines
84	9-11 13 (from "it was") – 19 24-25
85	1-7 8 (from "Where") – 9 10 (from "is that") – 12 13 (from "Have") – 15 16 (from "And")- 23
86	22-25
87	23-25
88	1 2 (from "How") – 24
89	8-15 and 17-25
90	1-11 and 13-25
91	1-25
92	1, 3-4 and 9-25
93	1-12 13 (from "did you have") – 25
94	1-7
95	25
96	1-11 and 13-25
97	2 (through "there") 23-25
98	1-5 and 11-23
99	11 (from "And") – 22
100	5-12 and 16-25
101	1-3 4 (from "after") – 8 15 (from "Johnny") – 17 18 (from "Was") – 19 (through "sleep") 20-25
102	1-15

103	16 (from "Have") – 25
104	1-11
105	8-19
106	12-21
109	16-18
113	4-18 and 20 21 (from "When") – 25
114	1 (through "out")
115	17-22
117	6-9, 11-14 and 17-20 (through second "Yeah")
119	23-25
120	1-2 and 13-18 (through "No") [Replace "Baruch Exhibit 2" with Def Ex] 21-23
121	13-25 [Replace "Exhibit 2" with Def Ex]
122	1-25
123	1-13
132	22-25
133	1-5 (through "so") 16-25
134	8 (from "Had")- 25
135	1-25
136	1-7, 10-22 and 24-25
137	1-25
138	1-7 and 11-25
139	1-3
140	15-17 and 19-20
141	15-25
142	1-2
148	18-19 [Replace "Exhibits 1 and 2" with Def Exs]
149	20-25
150	1-4
153	1-10 and 21-25
154	2-19 [Replace "Baruch Exhibit 1" with Def Ex]
155	21-25 [Replace Baruch Exhibit 2" with Def Ex]
156	1-8 and 11-19
158	20-25
159	1-2 (through "know") 11 (from "Let") - 25
160	10 [Replace "Baruch 2" with Def Ex] 12-25
161	1-6 and 19-25
162	1-25
163	1-15
173	12-21
174	9-12 and 18-20

176	19 (From "I") – 25
177	1-2 (through "door") 17-22
178	25 (from "you")
179	1-10 (through "Yeah")
181	1-18 (through "No")

Deposition of Robin Baum (January 20, 2022)

Objections to Plaintiff's Designations

Page/Lines	Objection
99:15-17	UN

Defendant's Counter-Designations of Robin Baum: None.

Deposition of Sean Bett (January 25, 2022)

Objections to Plaintiff's Designations

Page/Lines	Objection
27:14-15	O
28:6-7	O
29:2-6	O
31:9	O
33:5	O
34:8-9	O
35:13-14	O
46:15-19	O
71:11-12	O
95:10-11	O
101:10	O
101:12-18	O
102:8	O
103:13-14	O
103:22-104:1	O
105:10-11	O
105:15-16	O
116:12-22	IR
117:1-8	IR
118:15	O
118:20-21	O

119:3-4	O
119:9	O
120:5-6	O
121:4-122:5	IR
122:10-17	IR, H
128:5-6	O
133:5	O
133:20-22	O
134:12-135:20	H
135:21	O

Defendant's Counter-Designations of Sean Bett

Page	Lines
18	1
19	1-10
71	15 and 17-22
108	19 and 22
109	1-9
110	11-22
113	1-7
120	20-22
121	2-3
126	3-19
127	10-12 and 14-20
128	15-22
129	1, 3-10 and 13-16
130	1-7 and 22
131	2-7 and 10-11
132	11-13

Deposition of Christian Carino, Day 1 (January 19, 2021)

Objections to Plaintiff's Designations

Defendant objects to all of Plaintiff's designations of the January 19, 2021 deposition of Christian Carino on the grounds that the entire deposition is subject to a motion *in limine*. In addition, Defendant objects to Plaintiff's specific designations further, as follows:

Page/Line	Objections
13:13-21	O
121:13-14	O
128:13-17	O
151:21-152:6	O
152:13-19	H
153:1-14	H
153:19-154:3	H
154:22-155:12	H
160:13-161:14	H, L, SP
162:20-163:10	H

Defendant's Counter-Designations of Christian Carino, Day 1: None.

Deposition of Christian Carino, Day 2 (March 11, 2022)

Objections to Plaintiff's Designations

Page/Line	Objections
194:21-196:22	R
198:7-199:6	R
200:18-202:7	R, O, SP, AF
203:7-22	R, O, SP, AF
206:16-2-7:16	R
208:9-20	R, AF, O
210:9-12	R, AF, O
210:19-211:13	R, AF, O
212:3-14	R, O
213:2-15	R, O
214:17-215:2	R
219:12-17	R, H, L, SP, O
219:21-220:5	R, H, L, SP, O

221:8-15	R, H, IR
224:16-225:2	R
226:7-11	R, F/A, SP, L, O, H
226:15-227:12	R, F/A, SP, L, O, H
230:5-18	R, IR, F/A
232:8-16	R, F/A
233:7-234:4	R, L, F/A, O
234:18-235:1	R, H, L
235:8-17	R
236:3-16	R, L
237:8-22	R, SP, H, O
239:3-20	R, H, SP, L, AF, O
242:2-243:3	IR
244:11-254:3	IR, L, O
254:4-14	L, SP, F/A, H, O, AF, MIL
256:7-15	SP, AF, O, F/A
256:19-257:9	H, O
259:16-261:21	L, H, O, F/A
262:16-263:12	AF, H, F/A, MS
263:18-264:6	H, L, R, P
265:17-266:14	H, L, R, P
265:17-267:5	R, P, H, MIL, SP, AF, L
267:9-269:1	R, P, H, SP, L, O
270:1-11	R, P, SP, L, AF, O
270:15-271:19	R, P, H, AF, L, O
272:4-274:16	R, P, H, SP, O
275:2-276:9	R, P, F/A, SP, H, O
276:1-9	R, P
277:4-278:18	R, P, H, F/A
281:5-22	R, P, H, SP, L, AF, O
283:5-7	R, P, H, SP, L, AF, O
283:13-284:2	R, P, H, SP, L, AF, O
284:8-285:1	R, P, H, SP, L, AF, O
285:9-13	R, P, H, SP, L, AF, O
285:18-286:5	R, P, H, SP, L, AF, O
284:14-288:16	R, P, H, SP, L, AF, O
289:1-18	R, P, H, L, O
293:6-9	R, SP, AF
295:13-295:8	R, SP, AF
297:13-18	R, L, SP, O
299:7-300:8	R, P, SP, AF, F/A, L, O
300:21-301:6	R, H, SP, L
302:13-304:11	R, P, H, F/A, SP, AF, L, O
304:19-305:2	R, P, H, F/A, SP, AF, L, O
307:14-308:4	R, P, H, SP, O

308:17-309:5	R, P, SP, AF, F/A, L, O
311:1-19	R, P, SP, F/A, O
312:16-313:4	R, P, H, F/A, SP
318:17-319:5	R, SP, F/A, L
326:1-11	R
327:14-18	R
331:11-16	R, P, H, L
338:6-14	R
339:9-22	R
343:6-15	R, H, F/A

Defendant's Counter-Designations of Christian Carino, Day 2

Page Line

257	11 (from "And") – 13
352	19-22
353	1-12
354	3-12

Deposition of Connell Cowan (December 8, 2021)

Page/Line Objections

163:20-165:4	R, P
168:22-169:1	O
169:6-14	H
169:17-18	O
170:3, 5	O
170:10-17	H, L
171:12-18	MS, L
172:6-173:1	L, MS
173:2-13	L, MS, SP
173:17-174:17	H, L, MS
174:18-176:1	SP, L, H
176:18-20	L, H
177:6-10	L, H
179:17-181:4	SP, L, H
184:14-20	H
186:1-2	O
186:18	O
188:6-14	H, L
189:20-190:5	MS
190:19-191:13	MS
191:18-192:5	MS, L

197:11	O
198:7-12	SP, L
202:15	O
211:22-212:6	SP
213:12-20	L, H
214:5-13	L, H, SP
216:8-218:1	H, SP, L
219:22-220:5	MS, H, SP, L, R
220:6-20	MS, SP, R
220:21-222:10	MS, SP
222:11-19	H, L
222:20-223:7	L, H
223:10-11	O
224:19-20	O
229:16-17	O
230:4-231:3	L, MS
231:14-232:21	H
234:5-235:4	H, L, MS
235:21-237:18	L, H
239:6-7, 17	O
240:2-3	O
240:21-241:6	SP, L,
242:10-11	O
243:11-20	SP, L
245:9-10	O
245:14-22	L
247:19-248:5	L
248:10-249:1	L, AA
250:16	O
251:6-16	L, AA
251:21-252:14	L
273:8-17	MS, L, H
278:6-14	L, SP
279:12-280:6	MS, L, H
287:5-6	O

Defendant's Counter-Designations of Connell Cowan

Page	Lines
207	19-22
208	1-9
280	7-10 and 13-17
282	9-14
283	12-14
316	5-6, 9-10 and 14-22

317	1-9 and 20-22
318	1-2 and 5-12
321	6-22
322	1-3

Deposition of Candie Davidson-Goldbronn (March 30, 2021)

Objections to Plaintiff's Designations

Defendant objects to all of Plaintiff's designations of the deposition of Candie Davidson-Goldbronn on the grounds that the entire deposition is subject to a motion *in limine*. In addition, Defendant objects to Plaintiff's specific designations further, as follows:

Page/Lines	Objection
20:9-21	R
21:6-11	R
24:20-25:4	R
77:3-78:16	R, H
79:16-24	R
80:3-81:1	R
83:14-20	R
84:2-85:9	R
91:12-14	R
92:15-17	R
94:1-25	R
95:1-24	R, L, H, IR
97:14-16	R
98:8-99-21	R
109:3-4	R
115:22-24	R
116:19-21	R
119:4-10	R
120:7-25	R
121: 1-13	R, H

Defendant's Counter-Designations of Candie Davidson-Goldbronn: None.

Deposition of Christi Dembrowski (February 22, 2022)

Objections to Plaintiff's Designations

Page/Lines	Objection
36:18-20	O
40:3-10	O
40:19-21	O
41:10-13	O
41:21-42:1	O
60:2-5	O
60:12-13	O
60:19-21	O
109:15 and 20-21	O
111:9:12	O
111:18-20	O
112:11-12	O
148:10-11	O
148:15-16	O
166:11-12	O
166:18-21	O
202:16-18	O

Defendant's Counter-Designations of Christi Dembrowski:

Page	Lines
9	10 (through "Dembrowski") 13-14 16 (through "Dembrowski") 17 ("Camarillo, California" only)
29	10-11 (through "3") [Replace "Exhibit 3" with Def Ex]
31	9-11
32	2
33	8-10
35	9-18
36	1-2
42	4-12
43	6-11
44	8-9
61	3-4 [Replace "Exhibit 4" with Def Ex]
65	10-12, 14, 16-17, 20 and 22

66	1-2 and 5 22 (from "And")
67	1-3, 7, 9-12, 16 and 20-22
68	3
69	3-10 and 16-17
84	13-19 and 22
86	8-9 and 14-15
88	21-22
89	1 and 4
91	17-22
92	1-4
94	12-16 and 21
95	1-4
96	15-17
97	1
98	6-8, 11-12 and 14-15
100	16-22
106	17-19 and 22
107	20-22
108	1-11 and 14
128	15 (from "I") – 18
129	1-2
130	7-9
135	4 (from "And") – 9 18-22
142	5-7 and 12-15
143	2-3, 8 and 10-22
144	1-12
145	2-4, 9-12, 16 and 18-22
146	1-3 and 8
149	4-10 and 12
150	7-14, 16 and 18-22
151	1-7 and 12-13
154	11-13 and 15
155	5-15
156	8, 13 and 15-17
157	1-7, 12-14 and 18-21
158	2-3, 5-11, 14-16, 18-19 and 22
159	1, 3-8 and 11-12
160	3-8 and 19-22
161	5-7 and 9-13
162	1-3, 7 and 10-12
167	16-17 [Replace "Exhibit 11" with Def Ex]
169	7-9 [Replace "Exhibit 11" with Def Ex] 16 and 20-22

170	1, 4, 12, 16 and 18-22
171	1-4, 8, 10-17, 20 and 22
172	1-4 and 10-13
173	22
174	1 [Replace "12" with Def Ex] 11-22
175	1-2, 11-18 and 21-22
176	1 and 3-9
178	11-18
182	1-4 and 7-17 [Replace "Exhibit 18" with Def Ex]
183	5-9, 15-16 and 20-22 [Replace "Exhibit 19" with Def Ex]
184	1-2
185	5-6 and 10-11 [Replace "Exhibit 20" with Def Ex] 12 (from "on") 16 and 18-22
186	1-4
188	19-20 [Replace "Exhibit 228" with Def Ex]
189	2-4, 9 and 11-16
191	18-22
192	1, 8-9, 13 and 15-17
193	2-4
194	9-10 and 14-15
206	17-22
207	10-14, 17-18 and 20
208	1-5 21 (from "I") – 22
209	1

Deposition of Stephen Deuters (February 24, 2022)

Objections to Plaintiff's Designations

Page/Lines	Objection
101:10-11	O
103:1	O
103:17-18	
103:20-21	
104:15	O
125:15	O
141:18-20	O
142:4-5	O
193:21-195:11	H
195:19-21	H
196:10-14	H

Defendant's Counter-Designations of Stephen Deuters

Page	Lines
195	8-11
235	16-19 and 22
236	1-2

Deposition of Officer Christopher Diener (November 23, 2021)

Objections to Plaintiff's Designations

Page/Lines	Objection
81:18-19	R
81:20-21	R
82:1-5	R
82:7-8	R
83:5-7	R
101:7-12	R
101:21-102:1	R
138:19-22	R
139:18-140:2	R (through "control")
140:15-22	H, F
141:1-18	L, H, F
142:19-20	R
142:21-142:4	L, H, F
142:5-7	R
142:8-9	L, H, F
143:1-5	L, H, F
143:6-9	R
143:10-14	L, H, F
144:7-22	L, H
145:1-147:10	L
147:6-8	F
147:15-18	L, F
47:17-18	R
147:22-148:3	L, F
148:4-5	R
148:6-7	L, F
148:18-22	L, F, S
149:1-2	R
149:3-4	L, F
149:5-6	R
149:8-10	L, F

150:2-6	R
150:16-20	R
151:8-9	R
151:21-22	R
152:8-10	L, F
152:11-14	R
152:15-17	R
152:19-153:1	L, F
153:3-5	R
153:16-18	R
153:21-154:9	R
155:6-7	R
156:4-6	R
156:10-14	L, F
156:15-17	R
158:18	L, F

Defendant's Counter-Designations of Officer Christopher Diener: None.

Deposition of Laura Divenere (January 15, 2021)

Objections to Plaintiff's Designations

Page/Lines	Objection
23:21-24:7	O
77:1-2	O
77:20-22	O
78:6-9	O
81:17	O
82:11	O
82:11	O
82:21	O
83:12-13	O
104:8-11	O
105:5	O
105:14-15	O
114:7-13	IR
115:2-21	IR
116:20-117:2	IR
117:7-15	IR
117:15-118:4	O
118:16-22	IR
119:2-13	IR

119:7-8	O
119:15-20	IR
125:9-21	IR
126:7-13	IR
138:10-17	IR
139:6-140:19	IR
141:3-4	O
141:17-18	O
145:21-146:1	O
146:3-21	O
147:20-148:8	O

Defendant's Counter-Designations of Laura Divenere

Page	Lines
70	1-21
72	13-17
74	1-3
78	12-16 and 19
79	3-18
83	16 and 19-22
84	2-3, 7-10 and 12-16
89	18-22
90	1-2, 4-5 and 17-20
91	14-15 and 17
92	6
93	21-22
94	1 and 6-10
98	12-20
99	6-7
102	15-18
103	11-15, 17-19 and 21-22
104	1-2
106	8-11, 16-17 and 19-21
107	1-5
124	6-22
142	5-14, 17 and 19-22
143	1-15
145	11-17
147	5
150	14-22
151	1-2, 5, 7-10, 13 and 21
152	1-9, 12 and 17-21
153	3-15 and 17-21

154	2-9 and 11-21
155	3-8, 11, 13-15, 18 and 20-22
156	3, 6-7, 9-14, 18-20 and 22
157	1, 17-19 and 22
158	1-2 and 7
159	3-7
165	15-17 and 20-22
156	1-3

Deposition of Terence Dougherty (December 2, 2021)

Objections to Plaintiff's Designations

Page/Lines	Objection
16:1-14	R
18:6-19	R
23:11-16	R
26:17-28:19	R, P, MIL
28:1-19	L
29:4-30:1	R, P, MIL
29:7-8	O
29:19-20	O
29:17-18	L
29:22-30:1	L
30:6-21	R, MIL, P, F/A, H, L, UN, O
30:22-32:14	R, MIL, P, O
31:13:32:14	H
33:1-5	H, R, MIL, P, O
35:22-36:5	H, L, F/A, O
36:6-15	H, F/A, SP, L, O
67:11-68:5	R, MIL, P, L, C, O
68:6-69:8	R, MIL, P, L, O, H, F/A, SP
69:19-70:11	R, MIL, P, H, F/A, L, O
72:9-21	R, MIL, P, H, F/A, SP, O
73:21-74:17	R, MIL, P, H, F/A, SP, O
76:5-10	R, MIL, P
92:5-21	H, F/A, L
93:4-12	H, F/A, L, SP
101:12-22	R
120:12-21	R, MIL, P, F/A, H, O, L
126:12-18	R, MIL, P
128:1-130:18	R, MIL, P, O
131:6-133:3	R, MIL, P
133:10-135:5	R, MIL, P, L, O

135:17-157:1	R, MIL, P, O
139:17-140:4	L, H, F/A, SP
142:4-143:11	H, F/A, SP, L
148:17-151:11	H, F/A, SP
151:12-152:14	H, F/A, SP, L
153:16-154:2	H, F/A, SP, L
155:22-156:7	L
156:8-157:1	H, F/A, SP
157:13-158:2	R, MIL, P, L, F/A, SP
158:13-159:1	R, MIL, P, MS, L, O
159:2-13	R, MIL, P, H, F/A, L, O
159:14-22	R, MIL, P
162:7-164:5	R, MIL, P, H, F/A, SP, MS, O
166:8-21	R, MIL, P, O
167:17-169:2	R, MIL, P, H, F/A, SP, L
171:2-173:16	R, MIL, P, O
171:21-172:10	H, F/A, SP
172:13-21	L, MS, H, F, AF
172:22-173:7	H, F/A, L, SP
173:8-16	L
176:4-13	R, MIL, P
178:9-179:19	R, MIL, P, H, F/A, SP, AF, L, O
180:4-183:1	R, MIL, P, H, F/A, SP, AF, L, O
183:9-184:6	R, MIL, P
184:15-186:12	R, MIL, P, H, F/A, SP, L, O
187:20-188:7	R, MIL, P, H, F/A, SP
194:21-196:2	R, MIL, P, O, H, F/A, SP, MS, L
198:16-199:10	R, MIL, P
200:5-201:2	R, MIL, P, H, F/A, SP, L, O
201:8-204:11	R, MIL, P, H, F/A, SP, L, O, H
205:11-206:5	R, MIL, P
207:1-208:3	R, MIL, P, O, L, MS, H, F/A, SP
220:2-223:17	R, MIL, P, O, H, F/A, SP
224:7-226:7	R, MIL, P
230:6-237:13	R, MIL, P, L, O
235:7-236:10	L, H, MS, F/A, SP
238:14-239:7	R, MIL, P
263:2-264:15	R, MIL, P
265:14-17	O
268:2-21	R, MIL, P, H, F/A, SP
273:14-274:1	O
275:4-7	O
282:19-284:2	O
284:12-287:21	R, P, H, SP, F/A
285:14-286:6	R, H, F/A, SP

289:20-290:1	O
290:5-293:3	R, P, H, F/A, SP
293:12-14	O
295:4-10	R, P
297:3-299:5	H, SP, F/A
303:1-13	O
312:9-317:2	R, P, H, F/A, SP, L
359:7-364:3	R, MIL, P, H, F/A, SP, L, O
366:22-368:15	R, MIL, P, H, F/A, SP, L
372:13-377:5	R, MIL, P, H, F/A, L, O
378:20-3880:7	R, MIL, P, H, F/A, SP, L, O

Defendant's Counter-Designations of Terence Dougherty

Page	Lines
15	5-22
16	16-22
17	1-4
76	20-22
77	1-20
78	3-12 and 19-22
79	1-22
160	1-3, 10 and 12-19
161	3-11
164	6-8, 13 and 17-22
165	1-4 and 8-13
175	2-3 and 8-12
186	17-18
187	1-7 and 12-19
188	8 (from "What") – 10 16-20
191	5-8 and 12-18
192	2-15
196	16-17 and 21-22
197	1-7 and 14-22
204	12-18
205	3-10
206	6-10 and 16-18
208	4-7 and 13-19
209	2-16
226	8 (from "If") – 22
227	1
228	4-6, 10-13 and 18-21

242	1-2 [Replace "Exhibit 28" with Def Ex] 10-18
244	5-22
245	1-8 and 14-22
246	1-4
377	6-8, 17-20 and 22
378	1 and 6-19
403	13-19 [Replace "Exhibit 1" with Def Ex]
404	19-22
405	1-2, 5-10 and 19-22
406	1-5, 9-12 and 15-22
407	1-5, 8-12 and 21-22 [Replace "Exhibit 2" with Def Ex]
408	1, 4-6 and 8-22
409	1-2, 5-15 and 19-22
410	1-2, 5-6, 16-18 and 21-22
411	1-12, 15-18 and 20-21 [Replace "No. 4" with Def Ex]
412	12-13 and 16-22
413	1-10 and 19-21 22 (from "And")
414	1-16
415	2-19 [Replace "Exhibit No. 15" with Def Ex]
416	16-22
417	1 and 4-5 6 (from "And") – 8 10
418	3-12 and 16-19
419	1-3, 9-10 and 16-19
420	16-18 (through "2609" [Replace "Exhibit No. 21" with Def Ex] 20-22
421	1-8 17-19 (through "3037") [Referring to Exhibit 17; Replace with Def Ex]
422	2-6, 17-19 and 21-22
423	15-17
424	1-10 and 12-22
425	1-5 and 8-22
426	1-4, 7-17 and 20-22
427	1-9, 12-18 and 22
428	1, 9-10 and 16 [Replace "Exhibit 3" with Def Ex]
430	2-3 and 7-12

Deposition of Joshua Drew (November 19, 2019)

Objections to Plaintiff's Designations

Page/Lines	Objection
13:2-16	F/A, R
13:19-15:10	H
16:24-25	R
17:1-18:7	F/A, R, P
18:17-20:12	F/A, R, P
22:18-20	H
26:17-19	H
26:22-25	H
27:1-8	H, F/A, S
31:19-32:5	O
33:13-18	IR
36:9-14	F/A
37:15-38:7	F/A, S, P
40:10-24	F/A, S, P
43:1-10	F/A, P, R, MIL
53:17-55:7	H, R, F/A
58:19-25	R
59:1-12	R, IR
64:20-65:1	IR
67:12-24	IR
85:18-86:8	P, R
91:10-25	H, P, R
108:7-11	F/A, SP
257:11-22	R

Defendant's Counter-Designations of Joshua Drew

Page	Lines
33	19-20
42	21-22
49	8-11 and 24-25
50	1-13
65	25 (from "I")
86	9-25
87	1-6

Deposition of Erin Falati (February 4, 2022)

Page/Line Objections

55:5	O
55:7-9	R
55:12-17	O
56:13-14	O
72:4-5	O
73:17-74:5	R
74:20-21	O
81:4-5	O
93:22-94:1	O
94:18-19	O
95:9-11	O
107:19	O
108:2	O
111:8-13	R
120:18	O
122:16	O
123:2-3	O
123:5	O
123:13-14	O
135:1	O
142:16	O
145:7	O
194:18-195:3	L, SP
195:5-10	SP
198:6-13	L, SP
200:14-15	O
201:2-202:1	H, L, SP
202:2-203:6	H, L, SP
204:10-205:4	H, L, SP
205:14-206:15	H, L, SP
207:17-208:2	H
208:11-18	H
208:19-210:3	H, O, L
210:5-13	H, SP
210:14-211:1	H
211:2-6	H, SP
211:7-17	SP, L
211:22-213:5	H
213:7-13	O
213:14-214:1	L, H
214:19-20	O

216:5-6	O
216:17-18	O
216:20-217:11	H, SP
217:12-218:10	H, SP
218:12-22	L, SP
219:1-7	L, SP
221:22-222:15	SP, R
222:16-223:1	SP
224:14-15	O
226:10-11	O
227:1-2	O
227:11-15	SP
228:13-14	O
229:1-7	L, H
229:11-230:8	H, L, SP
232:1-2	O
232:5-14	L, SP, H
232:15-233:2	L
233:11-12	O
233:15-234:1	SP
234:22-235:1	O
235:12-13	O
237:4-18	H, L
240:11-20	H, L
243:20-244:5	L, SP
244:7-12	SP, L
245:4-8	L
245:9-19	SP, L
248:7-8	O
248:22-249:1	O
249:5-8	O
250:8-9	O
252:5-16	O
253:1-8	H
253:14-254:2	SP
254:3-13	H, SP
255:16-17	O
256:15-20	L, AA
257:7-11	L, AA
262:8-12	L, AA
262:13-263:2	SP, O
265:10-11	O
266:5-6	O
266:20-21	O
267:17-268:9	H, SP, L

268:10-14	H, SP, L
270:17-271:11	H, SP, L
272:9-10	O
272:22-273:1	O
275:10-276:4	SP, L, H
276:18-277:5	SP
279:8-13	O
280:1-2	O
280:5-281:4	SP, L
281:6-282:1	SP, L
282:19-283:7	SP, L
284:2-22	O
285:19-286:3	SP, L
287:5-6	O
289:10	O
289:15-16	O
294:15-296:8	SP, H, L
296:13-20	SP, L2
296:21-298:11	H
298:18-20	R, L
299:3	O
299:8-13	R
299:14-300:18	H
300:19-301:7	H, S, L
301:8-14	H, L
302:11-12	O
308:13-17	L
309:3-4	O
309:6-310:1	H, L, SP
310:13-20	H, L
311:19-312:15	L
314:2-3, 314:20-316:5	H, SP, L
316:16-317:11	H, L
317:16-20	H
318:16-319:15	H, SP, L,
319:18-320:3	O
320:9-322:11	H, SP,
322:16-322:3	SP, L, F
324:19-20	O

Defendant's Counter-Designation of Erin Falati

Page	Lines
83	13-18
144	4-6 and 8
195	11-14 20 (from "and") – 22
196	1
203	15-17 and 20-22
204	1-2, 4-5 and 8-9
250	14-16 and 19-21
328	1-3 and 5-6

Deposition of Officer William Gatlin (November 23, 2021)

No objections to Plaintiff's designations, and no counter-designations.

Deposition of Eric George (April 5, 2021)

Objections to Plaintiff's Designations

Page/Lines	Objection
134:5-135:6	R, MIL
136:9-19	R, MIL, H, F
136:13-17	R
137:4-140:8	R, MIL, H, F
140:21-142:18	R, MIL, H, F
143:12-144:16	R, MIL, H, F
146:1-8	R, MIL, H, F

Defendant's Counter-Designation of Eric George: None.

Deposition of Tyler Hadden (March 11, 2021)

Objections to Plaintiff's Designations

Page/Lines	Objection
91:14-15	R
140:15-16	R
191:12-192:21	IR, H, F, L
192:	L

194:4-6	L
194:7-8	R
194:19-20	L
194:22	R
195:4	R
195:10-12	L
195:15-18	L
195:19-20	R
195:21-196:1	L
196:2	R
196:14 and 16	L
196:15	R
196:21-22	L
197:1-2	R
197:7-8 and 10	L
197:12-14	L
197:15 and 21	R
197:18-20	L
197:22-198:1	L
198:3-6	L
198:8-10 and 12	L
199:17-18	R
199:21-22	L
200:4 and 6-12	L
201:15-17	L, H, F, S
202:16-19	L, H, F, S
203:3-7	L, H, F, S
203:14-20	H
204:21-22	R
205:4-7	L, H
205:10-13	L, H, F
206:12-13	L, H, F, S
206:20-21	L, H, F, S
207:1	L, H, F, S
207:3 and 6	L
207:8-12	L, H, F
207:17-208:2	L, H, F
208:5-10	L, H, F
208:12-18	L, H, F
208:20-209:3	L, H, F
210:20-211:6	L, H, F
211:12-21	L, H, F, S
212:4-11	L, H, F, IR
212:13-18	L, H, F, IR
212:20-22	R

213:2-17	L, H, F, IR
214:2-15	L, H, F, S

Defendant's Counter-Designation of Tyler Hadden

Page Lines

11	10-22
12	1-22
14	18-20
18	18-22
19	1-5 and 13
29	3 (from "So") – 8 13-22
21	1-2, 19-20, 22
22	1-10
23	2-4, , 6-9, 11-14 and 16-19
25	9-11
29	5-7 and 15-22
30	1-22
31	1-8, 11-12 and 14-22
32	1-9
38	5-22
39	1-13 and 16-19
49	7-22
50	1-4, 6-9 and 11-16
52	6-8 and 14-18
54	22 (from "do")
55	1-9 and 13-15
56	12-15
57	5 (from "Do") – 10 17-22
58	1-11
60	10-16 and 20-22
68	2-6, 18 and 20-22 [Replace "Deposition Exhibit Number 1" with Def Ex]
69	1-14 [Replace "Number 3" with Def Ex]
72	21-22
73	1-9
78	18-22
79	1-2 and 17-22
80	1-5 14 (from "And") – 16
81	21 (from "And") – 22
82	1 and 5-22

83	1-10 20 (from "Do") – 22
84	1-17 and 21-22
85	1-4, 6, 8-18 and 20-22
86	2-13 and 17-18
87	5-8
88	15-22
89	21
90	1-5
92	13-22
93	1-6 and 16-20
94	18-22
95	1-14
96	9-11, 17-20 and 22
97	1-16
99	2-8
101	8 (from "The") – 15
102	18 (from "can") – 22
103	1-19
104	10 (from "Typically") – 22
105	1-3, 5 and 7-22
106	1-9
109	3-7
112	15 (from "Then") – 22
113	1-15
115	22
116	1-18 and 21-22
117	11 (from "and") – 22
118	1-22
119	1-6
124	11-18
125	12-22
126	7 and 9-14 18 (from "Do") – 22
127	1-3, 10-16 and 22 [Replace "Deposition Exhibit Number 6" with Def Ex]
128	1-3, 11-14 and 19-22 [Replace "Deposition Exhibit Number 17" with Def Ex]
129	1-4 and 7 9 (from "And") – 12 15-16 and 18-22
130	1-3, 8-9, 11-12, 16-19 and 21-22
131	19-21
132	3, 5-8, 10-11, 16-17 and 22 [Replace "Deposition Exhibit Number 18" with Def Ex]
133	1-4

134	5, 8-9 and 11-19
135	2-22 [Replace "Deposition Exhibit Number 19" with Def Ex]
136	1, 7-18 and 20-21 [Replace "Deposition Exhibit Number 20" with Def Ex]
137	1-8 and 20-22
138	1-18
139	4-7
141	11-22
142	1-6, 13-15 and 21-22 [Replace "Deposition Exhibit Number 23" with Def Ex]
143	3-17 and 21-22
144	5-8 and 13-16
145	13 (from "I'm") – 19, and 22 [Replace "Deposition Exhibit Number 24" with Def Ex]
146	2-5 and 17-21 [Replace "Hadden Exhibit Number 24" with Def Ex]
147	2 and 9-18
148	5-6 [Replace "Exhibit Number 24" with Def Ex] 8-10, 14-15 and 17-20
149	3-5, 7-14 and 18-21
150	7-11
152	6-10, 12-13 and 15-22
153	1-12, 15-16 and 18-22
154	1-4, 7-8 and 10-18
155	16 (from "I'm") – 20 [Replace "Deposition Exhibit Number 25" with Def Ex]
156	1, 3-4, 10 and 16-20 [Replace "Deposition Exhibit Number 26" with Def Ex]
157	1, 3-4, 8, 14-16, 20 and 22 [Replace "Exhibit Number 27" with Def Ex]
158	1, 5, 11-15, 19 and 21-22 [Replace "Hadden Exhibit Number 27" with Def Ex]
159	4, 8-9, 13, 15-16 and 19 [Replace "Exhibit Number 29" with Def Ex]
160	2-16 and 19-20 [Replace "Exhibit Number 30" with Def Ex]
161	12 (from "I'm") – 17 and 21-22 [Replace "Deposition Exhibit Number 31" with Def Ex]
162	1, 6-10, 13, 15-16 and 20-22 [Replace "Exhibit Number 32" with Def Ex]
163	1, 6-9 and 12 [Replace "Exhibit 33" with Def Ex] 17-19 and 22 [Replace "34" with Def Ex]
164	1-2, 4-6, 9 and 14-18 [Replace "Exhibit Number 35" with Def Ex]
165	3, 7-11, 14 and 16-18 [Replace "Deposition Exhibit Number 36" with Def Ex]
166	2, 7-11, 14 and 16-17 [Replace "Exhibit Number 37" with Def Ex]

167	1-2, 4-5, 10-13, 16, 18-19 and 22 [Replace "38" with Def Ex]
168	1, 6-10, 13 and 15-17 [Replace "Exhibit Number 39" with Def Ex]
169	6-15 and 20-22 [Replace "Deposition Exhibit Number 40" with Def Ex]
170	1, 5-7, 12-16 and 19 [Replace "Exhibit Number 41" with Def Ex]
171	2-6 and 9 [Replace "Exhibit Number 42" with Def Ex] 13-17 and 20 [Replace "Deposition Exhibit Number 43" with Def Ex]
172	2-6, 9 and 14-18 ["Deposition Exhibit Number 44" with Def Ex]
173	20-21
174	1-2 and 5-12
175	5-17, 20 and 22
176	1-2, 7-10 and 12-16
177	1-4
179	3-22
180	4, 6-13, 18 and 20-22
181	2-7 and 14
183	8-13
215	2-7, 12-14 and 16-19
216	7-8 and 10-12
219	6 (from "Do") – 9 16 and 18-22
220	1-22
221	1-2, 7-8 and 10-15
222	11-13
223	2-7, 12 and 18-20
224	2-8, 10-13, 17-19 and 21-22
225	1-11, 17-18 and 20-22
226	1-9 and 15-22 [Replace "Hadden Exhibit Number 8" with Def Ex]
227	1-6, 9 and 14-18 [Replace "Exhibit Number 9" with Def Ex]
228	1, 3-6 and 20-22
229	1-22
230	1-16
231	10-11 and 13-22
232	5-6, 8-10, 13 and 15-22
233	1-22
234	1-2, 4-13, 16-18 and 20-22
235	1 12 (from "Have") – 15 18-19 and 21-22
236	1-3
238	6-22 [Replace "Deposition Exhibit Number 10" with Def Ex]
239	1-9, 17-19 and 21-22
240	1-22
241	1-11, 13-14 and 18-22 [Replace "Exhibit Number 11" with Def Ex]
242	1-16 and 22
243	1-2, 4, 7-8, 10-12, 17-18 and 20-22

244	1-4 and 21-22
245	1-5 and 11-13
246	5-8 and 19-21
247	2-5 8 (from "What") – 12 15-18 and 20-22
248	1-2 and 9-22 [Replace "Exhibit Number 49" with Def Ex]
249	1, 6 and 8-18

Deposition of Whitney Henriquez (February 3, 2022)

Objections to Plaintiff's Designations

Page/Lines	Objection
42:20-46:14	R
47:4-18	R
49:13-50:10	R
52:3-8	R
58:3-59:22	R
60:15-61:18	R
63:20-64:19	R
80:13-82:12	R
154:20-155:5	R
156:1-158:19	R
159:10-160:8	R
162:3-18	R
163:2-165:21	R
166:7-10	R
166:18	R
166:21-22	R
167:9-20	R
168:15-169:8	R
169:13-170:8	F, H, R
170:11-13	R
170:17-19	R
172:20-173:2	R (starting from "Do" on line 20)
174:14-16	R
174:21-22	R
175:5-7	R
176:22-177:1	R
185:3:5	R
185:8-10	R
185:13-14	R
186:16-18	R

201:12-13	R
202:8-10	R
202:20-22	R
203:9-11	R
205:18-20	R
226:19-21	R
227:5-8	R
239:3:7	R
239:12-17	R
240:14-16	R
241:6-8	R
242:9-11	R
243:19-21	R
247:1-3	R
248:1-3	R
248:11-13	R
248:19-21	R
249:3-5	R
249:15-17	R

Defendant's Counter-Designations of Whitney Henriquez

Page	Lines
85	13 (from "In any") – 15 17-18 and 22
86	1-6
173	9-14
178	1, 5-9 and 13-16
180	9-11 and 15-22
181	1-3 and 7-19
182	1-6and 15-22
183	1, 7-10, 14-16 and 20-22
184	1-6
185	19-21
186	3-6 and 20-22
187	4-14
188	5-14
190	9-14 and 18-22
191	1-5 and 11-20
192	2-12 and 16-22
193	1-2, 6-8, 12-16 and 20-22
194	1-8, 13-18 and 22
195	1-6 and 10-22
196	1-2, 6-12 and 16-22

197	1-2
198	12 (from "would") – 14 18-21
199	1-5 and 9-10
200	13-15 and 22
203	21-22
204	3-14, 17-18 and 22
205	1
206	4-6 and 12-21
207	3-9 and 13-18
208	18 (from "If") – 22
209	1-5, 9-16 and 22
210	1-6, 10-17 and 21-22
211	1-3 and 7-14
212	20-22
214	18-20
215	2-7, 11-14 and 18-20
216	2-5, 9-13, 17-20 and 22
217	1-3, 7-13 and 17-22
218	1-5
219	1-4, 8-14 and 19
220	11-16 and 21-22
221	1 [Replace "Exhibit 14" with Def Ex] 16-17 and 21
222	14-16 and 20-22
223	1-9, 13-16 and 20-22
224	1-16 and 20-22
225	1-11 and 15-22
226	1-3 and 7-13
228	18-21
229	3-16 and 20-22
230	1-19
231	1-5 and 9-17
232	4-7
241	11-20
242	2 and 20-22
243	1-2 and 6-15
244	1-3 and 7-18
245	2-22
246	1-7 and 11-17
249	20-21
250	3-7

Deposition of Jennifer Howell, Day 1 (February 26, 2021)

Objections to Plaintiff's Designations

Page/Lines	Objection
26:6-30:13	R
163:17-164:12	MIL, H, F/A, R, P
168:13-169:18	MIL, H, F/A, R, P
172:17-175:4	MIL, H, F/A, R, P
178:12-179:18	MIL, H, F/A, R, P
180:11-181:7	MIL, H, F/A, R, P
182:5-10	MIL, H, F/A, R, P

Defendant's Counter-Designations of Jennifer Howell, Day 1

Page	Lines
188	17 (from "Let's") [Replace "Exhibit Number 43" with Def Ex 20-22]

Deposition of Jennifer Howell, Day 2 (March 3, 2022)

Objections to Plaintiff's Designations

Page/Lines	Objection
229:1-14	R
231:3-20	MIL, R, P
235:17-236:11	MIL, R, P
241:17-242:11	MIL, R, P
247:8-19	MIL, R, P, SP
251:18-252:14	MIL, R, P SP, L, O, AF, H
253:2-7	MIL, R, P SP, L, O, AF, H
254:3-255:14	MIL, R, P SP, L, O, AF, H
256:9-10	MIL, R, P, L
264:20-266:3	MIL, R, P, H, AF, SP
272:19-274:17	MIL, R, P, H, AF, MS
280:5-12	MIL, R, P, L, H, O, AF
284:1-285:6	MIL, R, P, H, SP
292:18-294:3	MIL, R, P, H, L, AF
298:14-17	MIL, R, P, H, SP
299:3-11	MIL, R, P, H, SP
311:15-312:3	MIL, R, P
318:5-16	MIL, R, P, H

319:2-9	MIL, R, P, H
320:18-321:20	MIL, R, P, H
324:12-326:18	MIL, R, P
327:21-328:21	MIL, R, P, H
343:13-344:11	MIL, R, P

Defendant's Counter-Designations of Jennifer Howell, Day 2

Page	Lines
285	19-21
286	1-3
314	1-6
337	11-16 and 22
338	1-22
339	1-3 and 18-22
340	1-16
341	4-9
345	12-22
346	3-14
347	20 (from "And") – 21
348	2-8 and 10-22
349	1-4, 7 and 13-18
350	10-11, 13-18 and 22
351	1-7 and 17
352	16-18 and 21-22
353	1 and 5-7
355	10-12 and 15-22
356	1-2, 7-12 and 22
357	1-15 and 22
358	1-9, 16, 19-20 and 22
359	6-10 and 19-22
360	17-21
361	2 (from "In") – 5, and 7

Deposition of Melanie Inglessis (February 2, 2021)

Objections to Plaintiff's Designations

Page/Lines	Objection
63:13-14	O
121:17-20	C, L
134:13-15	L
134:19-20	L
135:2-3	L
135:6	L
135:9-10	L
135:13-14	L
135:17	L
135:20-21	L
136:2-4	L
136:7-8	L, F, H, R
136:13-15	L, F, H, R
136:20-21	L
142:12-14	L
148:6-8	L
148:12-14	L
154:20-155:1	L, H, F
159:19-22	L
160:3-6	L
177:18-20	L
195:18-20	L
207:4-5	L

Defendant's Counter-Designations of Melanie Inglessis: None.

Deposition of Tracey Jacobs (January 28, 2021)

Objections to Plaintiff's Designations

Page/Lines	Objection
19:19-20:3	O, F
47:13-22	O, F
48:1-16	O, F, H
132:21-134:2	L, F
134:3-8	L, F, H, MIL

134:9-12	L
135:15-22	L
150:8-14	R, F, H
150:17-19	L, F, H, SP
150:20-22	L, H, F
151:3-13	
151:17-152:5	R
152:6	L, H, F
152:9-13	
152:16	
152:17-19	H, F, SP
152:22	
153:1	
153:2-4	
153:7-15	
157:11:20	H, F, SP, L
169:6:13	MIL
169:14-15	H, L, MIL
169:18-170:1	H, MIL
170:2-5	H, F, MIL
170:8-9	MIL
170:10-15	H, F, MIL
170:18-19	
170:20-22	L, MIL
171:1-11	MIL
171:12-172:22	H, F, MIL
173:1-15	H, F, L, NP, MIL
180:4-14	H, F, SP
180:22	NP, MIL
181:1	
181:2-6	H, F, NP, MIL
181:9-13	
181:14-15	L, F, SP, NP, MIL
181:19-182:1	
182:3	
182:19-183:1	L, H, F, NP, MIL

Defendant's Counter-Designation of Tracey Jacobs:

Page	Lines
117	13-16
144	21-22
145	1-3 and 9-11
146	18-22
147	1-3

148	16-20
189	7-19
190	13-20
191	7
196	16-22
197	1-2
201	18-22
202	5
203	12-13 and 18-19
207	12-14 and 22
208	1
214	6-9

Deposition of Katherine O. James (February 18, 2022)

Objections to Plaintiff's Designations

Page/Line Objections

10:14-15	R
26:10-11	O
31:3-9	H
31:13-16	O
36:14-16	O
52:3-53:6	H
52:6-7	O
53:8-18	R, F/A
53:19-21	H
54:3-5	H
54:17-55:4	R, F/A
55:9-18	F/A
72:7	O
118:8-119:10	L
119:14-15	O
120:11	O
121:15-17	L
123:3-6	L
123:7	O
123:18	O
124:10-14	L
124:15	O
124:19-125:5	L
125:7-126:3	L, F/A
126:6-7	F/A

126:10-15	F/A
127:8-14	F/A
127:18-128:22	F/A
129:4-8	L, F/A
130:16-20	F/A
131:19	O
132:11	O
133:9	O
134:12-18	L
134:20-135:8	F/A
135:10-11	L
135:12	O
135:15-18	L
136:17-18	O
137:10-11	O
138:1-11	L
140:3-13	F/A
140:14-19	L
140:21-22	H
141:1-10	H, F/A
141:9-10	O
141:12-13	L
141:14-15	O
143:4-5	H
144:17-22	H
145:8-9	L
145:10	O
145:21-22	SP, F/A
146:6-7	F/A
147:9-12	L, H
147:15-19	H
147:22-148:14	F/A
148:18	O
149:16-18	L
150:4-13	F/A
150:14-18	L
152:8-15	F/A
150:22-153:16	MIL
153:2-9	F/A
153:11-16	F/A
153:18-155:15	IR, MIL
155:15-157 12	MIL
156:14-22	L, F/A
157:1-12	SP, F/A
157:13-158:22	IR

160:18-20	O
161:5-16	L
162:13 and 18	O

Defendant's Counter-Designation of Katherine O. James

Page	Lines
14	4-21
15	2-16
17	3-4, 6-7, 9-13 and 16
21	9-11
23	13-22
24	1-2
25	5-9
27	13-14
29	1-22
30	1-4 and 11-13
33	7-9, 12-13 and 19 [Replace "Exhibit 1" with Def Ex]
34	1-10 and 17-22
35	1, 10-15, 18 and 20-22
36	5-10
37	2-9 and 11-21
38	2 and 16-20
39	9-16, 20 and 22
40	1-2 and 6
41	8-10 and 16-19
42	4-5 and 8 (through "2") [Replace "Exhibit 2" with Def Ex]
43	13-22
44	1-11
45	12-17 and 22
46	1-2, 5-8, 10-12, 18-19 and 21-22
47	1-2, 5-8, 10-17 and 20-22
48	1, 3-5, 8 and 13-16
49	15-16, 18 and 22 [Replace "Exhibit 3" with Def Ex]
50	1-17 and 22
51	1-3, 10-13 and 16
58	14-17, 19 and 20-22 [Replace "Exhibit 4" with Def Ex]
59	1-11, 16 and 18-21
60	3-6, 8-14, 18 and 20-21
61	3-6 and 20-22
62	1, 7-12 and 14-22
63	1-5, 9 and 11-17
64	1-4, 8-9, 11-14 and 20-22
65	1-5, 7-16, 20 and 22

66	1-7, 11-15, 18 and 20-22
67	1-22
68	1-11
69	6-22
70	1-4 and 9-18
71	14-22
72	1-3
82	3-4 [Referring to Exhibit 8; Replace with Def Ex] 18-22
83	1 and 10-22
84	1-2, 7-12, 14-15 and 19-22
85	1
86	7-22
87	1-7, 9-11 and 13-22
88	1, 4, 6-11, 14-15, 17-19 and 22
89	1
90	5-9 and 11-22
91	1-9, 13-15 and 17-21
92	2-3, 5-6, 9-10, 12-18 and 22
93	1-4
104	21-22
105	1 and 12-22
106	1-7, 9-16 and 18-22
107	2-3 and 13
108	19-22
109	1-17, 20 and 22
110	1-22
111	1-6, 10-16 and 20-22
112	1-22
113	1-12, 17 and 19-22
114	1-8 and 11-13
132	15-16
149	10-12 and 14
163	22
164	1-2 and 5
165	21-22
166	1-19
167	1-3 and 5-14 [Referring to Exhibit 12; Replace with Def Ex]
168	9-22
169	1, 5-6, 8-9, 13-14 and 16-18
170	2-3, 5, 13-15, 18-19, 21-22
171	1-4

Deposition of David Kipper, M.D. (February 22, 2021)

Objections to Plaintiff's Designations

Page/Line Objections

8:9-10	R (Start at "Could you")
19:17-22	O
36:12-17	O
115:8-10	O
116:21-117:1	O
117:7-10	R, O
137:17-18	O
179:2-10	L
179:15-19	SP
179:20-180:1	L
182:6-10	SP
190:4	O
195:8-17	L, MIL
203:2-17	L, MIL
216:2-3, 10, 13	O
216:19-22	L, H
218:21-219:2	SP, L
219:3-7	L
221:21-222:13	L, H
222:14-19	L
222:20-223:18	H, L
223:19-224:10	SP, L
224:11-15	H, L
230:22-231:4	L
231:8-13	H
233:14-234:21	L, MIL
234:22-235:5	SP, L
242:17-22	H, SP
243:18-244:4	SP
244:15-19	SP
245:16-21	SP, L
245:22-246:3	L, H
255:2-10	L
257:18-258:12	H
259:6-13	H

Defendant's Counter-Designations of David Kipper, M.D.

Page	Lines
34	11-12 and 16-17
36	6 (from "when") – 9
46	10-13
53	17-22
54	1-5
67	13-14 and 21-22
68	1-9
107	20-22
120	22
121	1-6 and 9
185	8-15
186	1-4 and 13-16
196	1-3
201	9-16
237	17-22
238	1-11
239	3-11 and 13-18
259	14-17
261	4-12

Deposition of Debra Lloyd, APRN (January 20, 2022)

Objections to Plaintiff's Designations

Page/Line	Objections
28:4-8	O
30:22-31:2	O
35:14	O
36:2-7, 14-15	O
39:18-40:8	O
43:3-5	O
48:4-8	R, O
48:21-49:1	O
61:7-9	O
61:18-22	O
110:10, 12, 17-20	O
136:17-137:6	H
181:1	O
181:22-182:1	O

182:13-16	H
183:2-7	L
183:22-184:4	SP, L
190:5-7	O
195:6, 13-14	O
198:6, 10-11	O
200:10-11, 15-16	O
201:18-19	O
202:2-4, 11-12, 14, 19-20	O
203:3-4	O
205:20-21	O
206:4-16	SP, L
210:9-20	H, L
215:6-7	O
220:4-15	H, L
220:19-221:16	H
223:11-16	H, L
225:14-226:13	L, SP
226:17-20	SP
228:16-229:5	H, L
232:18-233:1	H
236:5-15	SP, AA
236:21-237:10	SP, L
238:30-239:7	H
240:8-240:11	H
241:20-242:6	H, L
243:5-244:17	H, L
246:4-9	H
250:7-18	AA, L
256:14	O
256:21-22	O
257:18-258:3	H
259:5-11	H
2654:14-17	H
275:10	O
275:12-276:12	H
276:13-18	AA
279:7-12	L
279:13-16	L, SP
280:20-281:3	H, L
281:6-7	O
281:20	O
282:20-282:3	H, L
285:11-286:4	H, L

286:5-286:20	H, L
288:12	O
288:15-18	L, R
289:5-290:5	H, L, R
290:12-21	H

Defendant's Counter-Designation of Debra Lloyd

Page	Lines
33	4-5
61	1-2
92	4-19
113	22
114	1-3 and 9-10
132	22
133	1-2
137	7-10
207	11-15
218	16-21
238	6-8 and 11
252	5-12

Deposition of Michelle Mulrooney (March 1, 2021)

Objections to Plaintiff's Designations

Page/Lines	Objection
12:2-4	R
14:21-15:2	R
15:8	R
17:4-10	R

Defendant's Counter-Designation of Michelle Mulrooney: None.

Deposition of Tina Newman (February 11, 2022)

Objections to Plaintiff's Designations

Page/Lines	Objection
38:1-9	R, F, H, S

Defendant's Counter-Designation of Tina Newman: None.

Deposition of Brandon Patterson (March 2, 2022)

Objections to Plaintiff's Designations

Page/Lines	Objection
49:13-14	O
91:5	UN (from "I do")
93:22	O
98:12-13	O
112:12	O
118:11-12	O
121:12-13	O
158:22-159:5	IR, D, H, F/A
160:3-6	F/A, SP, AF, H
163:7-9	IR, D, H, F/A
164:11-14	D, IR, H, AF, F/A
178:13-15	R
188:14-15	H, IR, D, F/A, AF
189:16-17	MIL, H, AF, L, F/A, NP
198:6-9	H
225:6-16	C, H, MIL, IR

Defendant's Counter-Designation of Brandon Patterson

Page	Lines
181	12-15 and 17-20
182	16-18 and 20-21
183	3-5, 8-9, 15-16 and 21-22
184	1-2
190	19-21
191	2, 4-5 and 8
199	4-6 and 11-14
223	14-17
226	12-13

227	1, 3-4, 7, 10, 12-20 and 22
228	2-4, 7-8, 10-11, 14, 16-17 and 19 (through "recall")
229	1-2 and 5

Deposition of Raquel Rose Pennington, Volume 1 (January 20, 2022)

Objections to Plaintiff's Designations

Page/Lines	Objection
12:4-12	IR
15:10-23	IR
16:9-11	IR
18:1-9	IR
18:19-25	IR
19:3-11	O
25:1-27:6	R, P
28:25-30:5	R, P
30:13-17	O
30:21-24	O
31:5-12	R, P
32:5-6	O
39:6	O
39:16	O
39:20	O
39:19-21	F/A
40:4	O
43:19	O
52:20	O
59:23-24	O
62:23-63:9	IR
63:12-13 and 22	IR
64:18-65:25	IR
66:22-67:9	IR
67:11	IR (as to "you previously testified")
69:11	O
72:4-6	O
72:22	O
96:12-97:16	IR
97:25-98:6	IR
98:14-99:7	IR
137:1-2	O
151:5-6	O
151:20-21	O

Defendant's Counter-Designation of Raquel Rose Pennington, Volume 1:

Page	Lines
38	5-8 and 10-12
49	16-22
58	21-24
60	2-3, 6 and 8-11
62	15-16 and 20-22
66	2-17

Deposition of Alejandro Romero (January 22, 2021)

Objections to Plaintiff's Designations

Page/Lines	Objection
26:8-15	H, F, IR
71:14-15	R
95:2-13	IR, H, F, R
96:19-97:6	L, IR, H, F, R
98:13-99:7	L, IR, H, F, R
105:12-18	IR, L, R, H
106:10-19	IR, H, F, R, L
106:20-22	R
107:1-109:20	IR, F, H
109:20-22	IR, F, H, L
110:1-3	R
110:4-6	IR, F, H, L
110:7-10	R
110:11-13	IR, F, H, L
110:15-22	L, H, F
111:1-2	L
111:3-13	L, H, F
111:14-15	R
111:16-19	L, SP
111:20-21	L
112:1-6	L, IR, H
112:7-8	R
112:10-15	L, IR, H
112:16-17	R
112:19-20	L, F
112:21-22	R
113:1-6	L, H
113:7-8	R

113:9-11	L
113:12-13	R
113:14-15	L
113:16-17	R
113:18-20	L
113:21-22	R
114:1	L
114:2-5	L, AA
114:6-7	R
114:8-10	L, AA
114:11-12	R
114:13-15	L, AA
114:16-17	R
114:18-22	L, AA
115:6	L
115:7-8	R
115:9	L
115:10-12	AA
115:13-14	R
115:15-18	AA
116:6-12	IR, H, F
116:13-14	R
116:16-117:8	IR, H, F
117:9-10	R
117:11-14	IR, H, L
117:15-22	H, F, L
118:1-6	H, F
118:7-8	R
118:9-22	H, f
119:1-4	R
119:5-11	H, F, L, MS
119:12-15	R
119:17-22	S, H, F, L
120:1-2	R
120:3	L
120:4-16	R
121:16-22	L
121:19	R
122:1-6	L
122:7-8	R
122:10-13	F, L, H
122:14-15	R
122:16	L
122:17-21	R
123:6-8	R

123:15-21	R
124:2-8	R, H, F
124:9-11	R
124:12-19	R, H, F
124:20-21	R
124:22	R, H, F
125:1-3	R, H, F, L
125:9-12	R, H, F, L
125:13-14	R
125:15-16	R, L, H
125:17-18	R
125:19-126:8	R, H, F
126:12-19	R, H, F
127:1-3	R, H, F
127:4-5	R
127:6-9	L, R, H, F
127:10-11	R
127:12-13	L, R, H, F
127:14-15	R
127:16-128:2	L, R, H, F
128:3-4	R
128:5-12	L, R, H, F
128:13-14	R
128:16:20	R
128:21-129:16	L, R, H, R
129:17-130:3	L
130:5-12	R
130:13-16	R, F, H
130:17-18	R
130:19-21	R, F, H
130:22-131:1	R
131:2-16	R, F, H, L
131:17	R
131:18-21	R, F, H, L
131:22-132:1	R
132:2-22	R, F, H, L
133:1-10	R, F, H, L, H
133:11-12	R
133:13-15	L, R
133:16	R
133:20-134:1	R, F, H, L
134:2-3	R
134:15-135:4	R, F, H
135:5-12	R, F, H, L
135:13-16	R

135:17-20	R, F, H, L
135:21-22	R
136:1-6	R, F, H, L
136:7-8	R
136:9-11	R, F, H, L
136:12-13	R
136:14-16	R, F, H, L
136:17-18	R
136:19-137:3	R, F, H, L

Defendant's Counter-Designation of Alejandro Romero

Page	Lines
9	10 (from "Have") – 22
10	1-3
14	1 (from "was") – 22
15	1-22
16	1-22
17	1-2 9 (from "Did") – 14 17-22
18	3-9 and 20-22
19	1-2
20	11-22
21	6-22
22	1-10 and 20-22
23	1-19
34	4-6
35	5-7 and 10-22
36	1-8 and 15-22
37	1-4 and 7-14
38	10 (from "I'm") – 14 19-22
39	1-4
41	15-22
42	1-22
43	1-13 and 16
44	13-16 and 19-22
45	1-22
46	1-18
47	18 (from "And") – 22
48	1-14
49	7-22

50	1-12 21 (from "Did") – 22
51	1-2, 5-8 and 14-17 (through "building")
52	4 (from "But") - 13 15-22
53	1-13
56	15-20
58	18-22
59	1-12 and 16-22
60	1-2, 7-14 (through "5") [Replace "Exhibit 5" with Def Ex] 18-22
61	1, 4 and 15-20
62	15-17 and 20-22
63	1-4
64	17-21 [Replace "Romero 7" with Def Ex]
65	3-19
67	20-22
68	4-7 and 9-22
69	1-22
70	1-16 and 19-22
71	1-3
73	10-12, 15-17 and 20-22
74	1-2, 5, 7-9 and 20-22
75	4-7, 11-14 and 17-22
76	1-22
77	9 (from "The") – 16 17 (from "I'm") – 22 [Replace "Romero Exhibit 1" with Def Ex]
78	1-8 and 22
79	1-22
80	17-22
81	1 and 6
82	4-7, 10 and 12-17
86	18 (from "And") – 22
87	1-4
163	21-22
164	1-11 and 13-22 [Replace "Exhibit 1" with Def Ex]
165	1-22
166	1-22
167	1-14 and 18-22
168	1-3
169	14-22
170	1-4
172	10-11, 14 and 17-22
173	1-10

Deposition of Anthony Romero (December 15, 2021)

Objections to Plaintiff's Designations

Page/Lines	Objection
20:18-21:9	R, MIL, P, L, O, H
21:13-18	R, MIL, P, L, O, H
24:17-22	F/A, SP, L
26:14-30:13	R, MIL, P, F/A, H, L, AF, O
32:1-34:22	R, MIL, P, F/A, H, L, AF, O
36:4-37:10	R, MIL, P, F/A, H, L, O, SP
43:20-44:3	R, MIL, P, L, F/A, H
46:6-47:6	R, MIL, P, L, F/A, H
48:22-50:19	R, MIL, P, L, F/A, O, H
51:16-22	R, MIL, P, F/A, SP, H
52:6-54:14	R, MIL, P, F/A, SP, H
56:16-57:3	R, MIL, P, L, O
57:20-58:11	R, MIL, P, MS, L, H
59:10-61:14	R, MIL, P, MS, L, H
62:6-63:19	R, MIL, P, L, O, F/A
65:1-67:12	R, MIL, P, H, L, O
132:2-133:20	R, MIL, P, F/A, L, O
149:10-15	R, MIL, P, F/A, H, A/F, SP, L, O
150:5-152:10	R, MIL, P, F/A, H, A/F, SP, L, O
154:14-155:21	R, MIL, P, F/A, L, P, SP, MS
161:5-163:6	R, MIL, P, IF, F/A, L
166:1-12	R, MIL, P, IF, F/A, L
181:18-182:7	R, MIL, P, SP, F/A, H, L, AA
211:9-221:2	R, MIL, P, L, AF, H, F/A, SP, O
221:16-20	R, MIL, P, L, AF, H, F/A, SP, O
222:4-22	R, MIL, P, L, AF, H, F/A, SP, O
223:20-224:2	R, MIL, P, L, AF, H, F/A, SP, O
259:9-18	R, MIL, P, L
273:21-274:11	R, MIL, P, H, SP
275:2-8	R, MIL, P, H, SP
275:16-276:22	R, MIL, P, H, SP
278:1:281:4	R, MIL, P, H, SP, L
292:14-297:3	R, MIL, P, H, F/A, SP, L, O
298:4-299:2	R, MIL, P, H, F/A, SP, L, O
300:14-301:9	R, MIL, P, H, F/A, SP, L, O
302:10-11	R, H, F/A, AF, L, O
302:16-308:9	R, H, F/A, AF, L, O
309:5-310:19	R, H, F/A, AF, L, O
312:13-313:1	R, H, F/A, SP

314:12-315:16	R, H, F/A, SP
316:7-22	R, H, F/A, SP
317:9-14	R, H, F/A, SP
358:20-359:13	R, SP, AF
370:1-10	R, MIL, P, SP

Defendant's Counter-Designation of Anthony Romero

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15	9-22
16	1-7
19	20-22
20	1-2 and 14-17
25	4-6 and 9-11
30	14-15, 18-20 and 22
31	1-2, 4-5, 7-13 and 15-17
35	1-5, 7-9 and 12-22
36	1-3
55	6, 10-11, 13-15 and 18-22
56	1-2
57	4-6 and 8-19
110	11 (from "I") – 15 17-21
120	8-19
144	1-5, 7-9, 12-18 and 20-22
145	1-2, 7-8 and 10-22
146	1-18
156	8-9, 11-13 and 15-17
157	3-6
163	7-8 and 12-22
164	1-3 and 6-15
165	3-4, 7-11 and 14-15
167	6-12 and 15-18
187	14-16 (through "16") [Replace "Exhibit 16" with Def Ex]
194	13-18
195	10-16 and 19
196	1-2 and 4-8
223	2-5, 9-10 and 13-17
224	9 (from "We've") – 22
225	1-5
226	9-11 and 15-19
281	19-20 [Replace "Exhibit 30" with Def Ex]
282	7 (from "Let's") – 18 21-22

283	1-7
308	11-14, 20 and 22
309	3
313	2-4, 8-12, 14-16 and 20-21
314	1-2 and 4-5
320	22
321	1-2, 13-15, 17-19 and 20-22
322	1-3 5 (from "And") – 7 9, 10-14, 16-19 and 21-22
323	1-3, 5-6, 8-9, 12-17 and 19-22
325	19-21 (through "Romero") [Referring to Exhibit 2; Replace with Def Ex]
326	4 (from "Yes") – 5 8-22
327	1-10, 13-16 and 19-20
330	20-21 (through "please") [Replace "Exhibit 4" with Def Ex]
331	12-14 and 17-22
332	1-6 and 12-14 (through "Heard")
338	12 (from "By") – 14 16-19 and 21-22
339	1-5 and 7-8 [Replace "Exhibit 7" with Def Ex]
340	22
341	1-9
342	14-15 and 20-21 [Replace "Exhibit 8" with Def Ex]
343	1
344	5-13 and 16-21
345	1 (from "And") – 5 12 (from "And") – 22
346	1, 4-8 and 15-22
347	1-3 4 (from "And") – 6 14-20
348	2 (from "Let's") [Replace "Exhibit 14" with Def Ex] 7 (from "Are") – 8
349	3-22
350	1-3
351	19 (from "So") – 22
352	3-9
357	21-22
360	17-22
361	1-2, 4 and 7-8
364	11-15, 20 and 22
365	1-7, 9-11 and 14-15
367	22 (from "Do")
368	1-2, 10-17 and 20

Deposition of Officer Melissa Saenz (March 31, 2021)

Objections to Plaintiff's Designations

Page/Lines	Objection
242:5-7 and 10	L, H, F
242:12-15 and 19	L, H, F
242:21-243:1 and 4	L, H, F
244:4-7	L, H, F
244:9-113	L, H, F
244:15-20	L, H, F
244:22-247:22	L, H, F
249:6-255:2	L, H, F
255:3-11	H
256:18-258:17	L, H, F
259:1-260:18	L
263:1-265:8	L, H, F
265:18-267:16	L, H, F
270:11-17	L, H, F, S
270:19-22	L, H, F
271:1-17	L, H, F
272:3-22	L, H, F
273:6-274:4	L, H, F
274:19-275:12	L, H, F
276:9-12	L, H
276:14-20	L, H, F
276:22-277:5	L, H, F
277:9-280:6	L, H, F
285:20-286:18	L, H, F
287:11-288:18	L, H, F, R, IR
289:14-293:8	L, H, R, R, IR
294:5-295:14	L, H, F
315:11-317:19	L, H, F
319:1-330:11	L, H, F
331:13-336:20	L, H, F
337:2-340:14	L, H, F

Defendant's Counter-Designations of Officer Melissa Saenz

Page	Lines
9	17-21
11	10-16 and 22
12	1-22
13	1 and 21-22

14	1-2 and 20-22
15	1 and 18-22
16	1-7 and 20-22
17	1
18	19-22
19	1-11, 16-17 and 19-22
21	11-19
27	17-22
28	1-19
29	1, 3-17 and 20-22
30	2-3, 6, 9-12, 15-16 and 18-22
31	1-4 and 11-16
32	4-13 and 19
36	2-5 and 12-16
37	10-11, 15-16 and 18-22
38	1-9
39	5-9
42	20 (from "When") – 22
43	1-5 10 (from "Do") – 16 19 and 22
44	1-2, 7-9 and 12 21 ("After") - 22
45	1, 5, 7-8, 14 and 16-20
51	2-3, 6, 9-10 and 12-22
52	1-22
53	1-4
54	19 and 22
55	1, 3-12 and 16-22
58	14-19 [Replace "Deposition Exhibit 14" with Def Ex]
60	2
63	5 (from "It's") -6 , and 19-22 [Replace "Deposition Exhibit Number 14" with Def Ex]
64	2 (from "When") – 11
65	3-4 6 (from "Now") – 22
66	1-7
68	5-7 and 11-12
86	16-21 [Replace "Deposition Exhibit Number 1" with Def Ex]
87	1 8 (from "And") – 19
89	2-7, 19 and 21-22
90	1-8
92	11-15 and 21-22
93	2-7

	14 (from "And") – 16, and 22
94	1-2 and 19-22
95	1-7 and 17-22
96	1-3, 10-12 and 15
97	5 6 (from "And") – 22
98	1-13, 16-19 and 21-22
99	1-12 and 21
100	1 (from "In") – 5 and 10-14
101	6-18 [Replace "Exhibit Number 8" with Def Ex]
102	5 7 (from "And") – 10 14 and 22
103	1-21
104	4-18
105	1-2, 4-8, 12, 16 and 22
106	1-21
107	3-8, 13-14, 16-18 and 20
108	11-18 [Replace "Exhibit Number 10" with Def Ex]
109	3-22
110	1-9
111	6-22
112	1-22
113	1-22
114	1-22
116	20-22 [Replace "12" and "Exhibit Number 12" with Def Ex]
117	1-22
118	1-4 and 16-18
119	2-5 and 11-22 [Replace "Exhibit Number 11" with Def Ex]
120	1
123	2-13 [Replace "Exhibit Number 3" with Def Ex] 18-22
124	1-3 and 9-22
125	1-7
129	5 and 8-15 18 (from "So") – 20 21 (from "And") – 22
130	1, 5, 7-8, 18-20 and 22
131	1-4, 10, 13 and 20-21
132	3-4, 6-9, 11-19 and 21-22
133	1-22
34	3-4 and 14-15
136	2-5, 9-11 and 20-21
137	2, 12-13 and 18-22
138	1 and 22

139	1-3 and 7
142	12-22
143	1-22
144	1-10 16 (from "Now") – 22
145	1 (from "Did") – 22
146	1-21
147	9-13
150	5 (from "what") – 22
151	1-5 and 11-19
152	3 and 22
153	1-3, 6-8 and 10-19
154	2-7 and 9-13
155	14-22
156	1-8, 13 (from "can") -14 and 17-22 [Replace "Plaintiff's Exhibit Number 23" with Def Ex]
157	1 (from "I'm") – 5 8-12, 16-17 and 21
158	1-2, 7-8, 10-12, 17 and 19-22 [Replace "Plaintiff's Exhibit Number 17" with Def Ex]
159	1-10 and 15
164	6-13, 17, 19-20 and 22
165	2-5, 16-18 and 22
166	6, 9-11 and 17-19
167	3-10 and 16-22 [Replace "Deposition Exhibit Number 18" with Def Ex]
168	14-16 and 18-21
169	1-6, 13-15, 17 and 19-22
170	1-6, 9, 11-18 and 22 [Replace "Number 19" with Def Ex]
171	1, 9-10, 12-15, 19 and 21-22 [Replace "Exhibit Number 19" with Def Ex]
172	1, 3-4, 6-9, 12-15 and 18-22
173	1-2 and 16-22
174	1-4 6 (from "let's") [Replace "Number 20" with Def Ex] 9-22
175	1-9 and 14-22
176	1-5, 8-9, 11-13, 16 and 18-22
177	1-2 11 (from "and") [Replace "Number 21" with Def Ex] 20-22
178	1-2 and 16-18
179	4-6 and -22
180	1, 13-17 and 21 [Replace "Exhibit Number 24" with Def Ex]
181	1 (from "Do")- 2 5, 7-9, 11, 13-14, 19 and 21-22
182	10-14 and 22

183	2-8 and 15-19 [Replace "Exhibit Number 25" with Def Ex]
184	4-6, 12-13, 15-16, 19-20 and 22
185	1, 8-9, 11, 13-14 and 19-22 [Replace "Exhibit Number 26" with Def Ex]
186	1-2, 10-12, 15 and 17-22
187	1-4, 11-14 and 16-21
188	6-9 and 15-19 [Replace "Exhibit Number 27" with Def Ex]
189	5-6, 10, 12-13, 18-19 and 21-22
190	1-2 and 5-17
191	2-15, 17-18 and 21-22 [Replace "29" with Def Ex]
192	1-10 12-13 [Replace "Number 30" with Def Ex] 16-22
193	1-3 and 19-22
194	1-5 and 18-22
195	1-15 and 18-22
196	5 and 8 (from "let's") [Replace "31" with Def Ex] 11-20 [Replace "Exhibit Number 31" with Def Ex]
197	4-5, 9, 11-12, 16 and 18-22
198	1-8 and 12-18
199	6-8, 13-15, 19-20 and 22 [Replace "32" with Def Ex]
200	1, 3-4, 9-11, 15-16, 18-20 and 22 [Replace "Exhibit Number 33" with Def Ex]
201	2-3, 7-15, 18 and 22 [Replace "34" with Def Ex]
202	1-2, 4-5, 8-10, 13, 17-19 and 21-22 [Replace "35" with Def Ex]
203	1, 7-10, 16, 19 and 21
204	1, 4-7, 9-10, 15, 18 and 20-21
205	1-2, 4-6, 9-10, 12-15, 18-19 and 22 [Replace "37" with Def Ex]
206	1, 5-6, 14-15, 19 and 21
207	1-3, 5-7, 12-15, 17-18 and 21-22
208	2-17
209	1-4 and 6-17
210	2-4, 6-15 and 18-19
211	3-5, 7-12 and 14-22
212	1-11 and 17
213	1-2 [Replace "38" with Def Ex] 7-9, 11-12, 14 and 16-22
214	4-5, 7-11, 14, 19-20 and 22 [Replace "39" with Def Ex]
215	1-2, 4-5 and 7-22
216	203 [Replace "40" with Def Ex] 6-7, 14-15, 17-18 and 21-22
217	2-4, 8 and 10-20
218	2-5, 7-10 and 16-21
219	1-5, 9-12, 14-15 and 21-22
220	1, 3-6, 9-11 and 14-18 [Replace "41" with Def Ex]
221	2-3, 5, 7-12, 16-18 and 21 [Replace "42" with Def Ex]

222	4-5, 7-8, 12-13 and 15-20
223	6-9, 11-14 and 22
224	1-2, 5-8, 11, 16-17, 19-20 and 22 [Replace "43" with Def Ex]
225	2-10, 17, 19 and 21-22
226	1-2 [Replace "44" with Def Ex] 5, 10-12, 14-15 and 19-22
227	1-19
228	5-6, 8-10 and 12-15 [Replace "17 to 44" with Def Ex # - #]
230	4, 6-9 and 22
231	1, 3-7, 10, 13, 17-20 and 22
232	1-22
233	1-3 and 9
341	9-21
342	4, 5-7 and 18-20 [Replace "21" with Def Ex]
343	4, 6-12, 17-18 and 20-22
344	1-6 and 17-22
345	1-7, 17 and 19-22
346	1-2, 9, 11-15, 17 and 19-22
347	1, 8, 10, 15
348	8 (from "Do") – 11
350	9-14 and 18

Deposition of Rami Sarabi (March 2, 2022)

Objections to Plaintiff's Designations

Page/Lines	Objection
16:11-13	R, L
17:21-18:13	R
19:11-18	R, F/A
69:3-21	R, F/A, H, SP
69:7-8	L
70:15-21	H
73:1-4	L
73:22-74:10	H, F/A, R
83:11-84:9	R, SP, H
87:7-11	L
87:15-19	
89:2-4	H
89:5-12	L
96:6-9	L
97:7-12	L, H

Defendant's Counter-Designations of Rami Sarabi

Page	Lines
74	14-22
75	1-3 [Subject to ruling on Defendant's objections]
94	6-11 and 18-22
95	1-2

Deposition of Kristina Sexton (December 18, 2019)

Objections to Plaintiff's Designations

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105:9-12	R, AF
105:23-25	AF
106:6-7	L, R
108:2-3	H
108:12-14	L, H
108:24-25	L
109:15-16	L
109:22-25	L
122:17-18	L, H, F/A
147:22-25	L, AF, F/A
148:7-11	L, H, F/A, MS, AF

Defendant's Counter-Designations of Kristina Sexton: None.

Deposition of Monroe Tinker (January 6, 2022)

Page/Line	Objections
8:8-12	R
24:11-12	O
32:3-7	O
60:21-22	O
111:6-10	O
113:8-11	O
126:17	O
126:21	O
127:19-130:9	SP
130:10-13	L

134:21-135:12	SP
139:19-140:1	SP
140:2-7	SP
140:13-14	O
141:1-6	SP, L
140:10-11	O
140:16-17	O
141:22-142:10	SP, F
143:12	O
144:15-145:2	AA, L, SP
145:5-6	O
145:22-146:1	O
146:12-17	SP, L
148:1-9	SP
148:10-13	L, H
148:22-149:5	SP, L
149:6-9	L, H
155:2-6	L, SP
155:7-13	SP, L
155:14-156:14	SP, L
156:21-157:3	L
157:4-16	L, SP, H
158:7-20	L, H
160:14	O
160:16-161:3	SP
164:4-8	SP
164:21-165:3	SP
165:4-6	SP
166:6-10	SP, L
166:14-167:12	SP, L
167:13-19	L
168:8-17	L
168:18-169:2	L, AA, H
172:15	O
173:1-16	H, SP
174:3-4	O

Defendant's Counter-Designations of Monroe Tinker:

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58	3-6 and 8-13
65	21-22
66	3-22
67	1-11

68	12-17 and 20-22
69	22
70	1-4, 10, and 19-22
71	1-7
73	16-20 and 22
74	1-17
77	14-18
78	3-12 and 20-22
79	1-14 and 20-22
80	1-11 and 16-20
81	4-22
82	1-6
83	3-16 and 20-22
84	1-18
85	6-22
86	1-21
87	2-22
88	1-16
90	20-22
91	1-21
92	2
93	2 (from "And") – 22
94	1-22
95	1-22
96	1-22
97	1-8 and 20-22
98	1-3 and 19-22
99	1-22
100	1-22
101	1-2
114	3 and 6-7
115	1-5
179	13-22
180	1-14
181	14-16 and 20

Deposition of Adam Waldman (February 15, 2022)

Objections to Plaintiff's Designations

Page/Lines	Objection
116:11-117:2	IR, NP, IF, F/A, P
118:1-14	IR, NP, IF, F/A, P
143:6-148:3	H, F/A, P, D, AF, IR
148:17-150:9	H, F/A, P, D, AF, IR
151:22-153:8	H, F/A, P, D, AF, IR
159:10-160:1	UN
160:20	O
161:3-162:22	H, IR, F/A
163:1-15	H, IR, A
164:7-11	UN
165:3-5	H (starting from "He" at line 3)
170:1-6	UN
170:14	O
170:19:171:2	H, F/A (starting at "And" at line 19)
181:19-182:5	UN
183:9-185:2	F/A, IR, AF, D
188:1-9	F/A, IR, D
201:13-21	UN
202:6-205:16	IR, H, D, AF
206:1-16	IR, H, D, AF
232:21-22	O
233:1-234:6	F/A, L, H
233:7-8	O
233:18-19	O
234:1-2	O
234:7-21	L, F/A, H
234:10-11	O
234:15-16	O
235:3-4	O
235:12-13	O, UN

Defendant's Counter-Designations of Adam Waldman

Page	Lines
150	8 (from "and") - 9

Deposition of Laura Allision Wasser (December 16, 2020)

Objections to Plaintiff's Designations

Page/Lines	Objection
69:6-11	R
72:13-15	R, H, F
72:16-22	R
73:1-74:6	R, H, F
74:9-75:8	R, H, F
76:15-77:11	R, H, F
100:13-15	R
129:8-15	R
134:1-8	R
135:1-10	R
136:4-5	R
172:20-22	R
216:14-16	R
218:9-15	R
220:9-13	R
230:6-10	R
231:1-7	R
231:8-19	R, H, F

Defendant's Counter-Designations of Laura Allision Wasser

Page	Lines
6	13-22
7	1-2 13 (from "you") – 19
13	21-22
14	1-8
15	4 (from "The") – 6
21	12-16 and 19-20
22	4-11
23	2 (from "when") – 17
24	10
31	15-18 and 21
35	22
36	1-2 and 11-22
37	1-2
48	7-11
58	4-10 and 15-22
59	1-2 and 9-15

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65	3-15
70	17-20
71	3-4 and 12-19
72	6-9
90	3-19
91	21-22
92	1-7, 12-17 and 19-22
93	1-4 and 8-10
94	4-15 and 18-19
95	1-10 and 15-22
96	5-8
97	5-13 and 21-22
98	1-4, 8-17 and 21
99	3-8, 13-15 and 19-22
100	1-3 and 22
101	1-2 and 5-22
102	1-22
103	1-5
105	3 (from "Ms.") – 16
108	3-5 and 10-18
109	4-16
111	7-10 and 16-22
112	1-9 and 22
113	1-8
116	3-8 and 13-22
118	13-20
120	15-22
121	1-2 and 17-21
122	2-7 and 12
126	17 (from "when") – 22
127	1-7
128	1-3 and 20-22
129	1-6
130	18-22
131	1-10
132	10-14 and 16-22
133	1-2, 7-12 and 20
136	7-8 and 11
165	18 (from "I'm") – 22
166	1 and 11-15
167	12
170	4 (through "Wasser") 12-22
171	1-11 and 22

173	14-22
174	1-22
175	1-17
176	4-7 and 12-22
177	1-7 and 10-13
187	17-22
188	1, 9-16, 19 and 22
189	1, 6 and 18-22
190	1-5 and 22
191	1-5 and 11-12
192	8-22
193	1-3 and 17-21
197	6-9 and 20-22
198	1-10
199	10-13 and 18-22
200	1-2 and 20-21
201	7-16
203	18-22
204	1
221	6-22
222	1-2
223	1-8 and 13-15
225	21-22
226	1-3 and 15-16
228	21-22
229	1-12

Deposition of Jack Whigham (January 20, 2021)

Objections to Plaintiff's Designations

Page/Lines	Objection
19:15-16	O
22:2-4	O
23:21-24:3	O
36:2-4	O
36:15-16	O
41:16-17	O
74:7-76:16	MIL
80:4-81:14	R, P, MIL, O
82:10-20	MIL, O
158:16-159:18	MIL, O, F/A, R

160:4-11	R, L, O
161:8-13	R, L, O, H, F/A
162:1-11	R, L, O, H
163:11-165:3	MIL, R, O, F/A, SP
169:8-15	H, L, O
171:10-19	H, L, O
172:11-173:22	MIL, F/A, H, L
175:12-177:5	MIL, F/A, H, O, SP

Defendant's Counter-Designations of Jack Whigham

Page	Lines
73	20 (from "can") – 22
74	1 and 4-6
76	17-22
77	1-11

Deposition of Edward White (February 2, 2022)

Objections to Plaintiff's Designations

Page/Lines	Objection
156:2-3	O
156:20	O

Defendant's Counter-Designations of Edward White: None.

Deposition of Bruce Witkin (February 17, 2022)

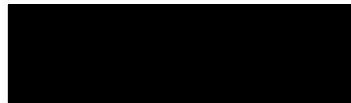
Objections to Plaintiff's Designations

Page/Lines	Objection
11:10	O
12:4	O
20:19-21	O
125:17	O
126:6-7	O
127:8-9	O
146:22-147:16	H
153:14	O

Defendant's Counter-Designations of Bruce Witkin: None.

March 18, 2022

Respectfully submitted,



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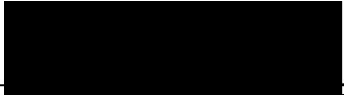
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 18th day of March, 2022, by email, by agreement of the parties, addressed as follows:

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