

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

TERRY PETTEWAY, et al. Plaintiffs,	§	
v.	§	
GALVESTON COUNTY, TEXAS, et al. Defendants.	§	Civil Action No. 3:22-CV-00057 (consolidated)
	§	
	§	
	§	
UNITED STATES OF AMERICA, Plaintiffs,	§	
v.	§	
GALVESTON COUNTY, TEXAS, et al. Defendants.	§	Civil Action No. 3:22-CV-00093
	§	
	§	
	§	
DICKINSON BAY AREA BRANCH NAACP, et al. Plaintiffs,	§	
v.	§	
GALVESTON COUNTY, TEXAS, et al. Defendants.	§	Civil Action No. 3:22-CV-00117
	§	
	§	

**DEFENDANTS’ DEPOSITION DESIGNATIONS AND OBJECTIONS AND
COUNTER-DESIGNATIONS TO PLAINTIFFS’ DEPOSITION DESIGNATIONS**

Defendants Galveston County, Texas, Hon. Mark Henry in his official capacity as Galveston County Judge, and Dwight D. Sullivan in his official capacity as Galveston County Clerk (“Defendants”) submit their deposition designations in the attached Exhibit A, and submit their objections/counter-designations to Plaintiffs’ designations in the attached Exhibit B. Defendants object to the use of deposition testimony when the witness

is available to testify at trial. Defendants further object to the use of any exhibits reviewed in designated deposition testimony unless those exhibits are entered into evidence. Defendants further object to the inclusion of counsel discussions of attorney-client privilege or other non-evidentiary exchanges.

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Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served to all counsel of record via eservice on July 18, 2023.

/s/ Angie Olalde _____

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
Darrell Apffel					
	79	25	80	10	
	85	20	86	1	
	103	3	103	5	
	103	14	103	23	
	106	24	107	16	
	130	4	130	6	
	148	9	149	2	
	160	7	161	5	
	216	18	216	25	
	219	3	219	21	
Barreto, Matt					
	36	1	36	18	
	38	1	38	21	
	40	4	40	13	
	43	24	45	3	
	50	1	50	25	
	51	4	51	24	
	53	19	54	2	
	56	10	57	25	
	58	4	58	25	
	69	2	69	21	
	71	14	71	24	
	77	14	78	14	
	80	1	80	4	
	81	4	81	25	
	83	7	83	10	
	83	20	84	7	
	84	18	86	9	
	87	4	87	12	
	88	1	88	14	
	90	3	90	11	
	91	7	91	17	
	92	10	93	9	
	94	10	94	21	
	95	22	95	25	
	96	4	96	19	
	97	19	97	21	
	102	18	103	7	
	107	3	107	10	
	109	13	110	6	
	111	15	111	25	
	124	3	124	15	
	130	17	131	9	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	132	1	133	9	
	134	13	135	6	
Bryan, Thomas					
	35	7	35	21	
	41	2	41	8	
	50	7	50	13	
	51	2	52	5	
	53	2	53	12	
	58	2	58	5	
	58	14	59	4	
	60	2	60	16	
	64	16	65	3	
	65	7	66	2	
	68	19	69	6	
	82	3	82	13	
	89	20	92	2	
	92	7	93	1	
	97	15	98	6	
	99	4	99	20	
	100	10	101	2	
	105	5	106	7	
	106	11	107	4	
	110	14	110	20	
	112	12	112	15	
	121	5	121	16	
	139	9	140	3	
	142	19	143	14	
	144	3	144	11	
	157	6	157	12	
	159	1	159	18	
	160	2	160	15	
	161	1	161	16	
	163	1	163	12	
	179	17	180	2	
	186	3	190	12	
	191	8	191	15	
	216	6	216	21	
	217	19	218	17	
	220	2	223	3	
	231	13	232	15	
Compian, Joe					
	28	11	28	20	
	43	5	43	10	
	99	20	99	21	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	100	11	100	17	
	108	24	109	12	
	113	19	114	4	
	123	20	123	25	
	139	9	139	16	
	141	19	142	21	
	180	5	180	17	
	195	25	196	11	
	210	7	210	22	
	218	15	218	18	
	227	2	227	11	
	243	12	243	24	
	249	8	250	21	
Cooper, William					
	36	8	36	16	
	37	5	37	23	
	38	2	38	3	
	44	13	44	20	
	46	2	48	16	
	48	21	49	25	
	51	1	51	21	
	52	1	53	4	
	55	15	56	2	
	56	8	56	14	
	56	19	56	24	
	75	3	75	21	
	77	2	77	19	
	84	9	84	24	
	94	10	94	18	
Courville, Edna					
	37	22	38	18	
	38	22	39	7	
	79	25	80	5	
	80	9	80	16	
	90	10	91	6	
	96	23	97	20	

Exhibit A

Defendants' Deposition Designations

Petteway v. Galveston County

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	102	22	103	1	
	103	10	103	22	
	110	10	110	16	
	110	17	110	24	
	110	25	111	1	
	129	12	130	25	
	138	23	139	8	
	141	4	141	9	
	142	4	142	11	
	142	16	143	12	
	144	2	144	18	
	149	17	149	23	
	150	8	151	5	
	167	23	168	24	
	185	5	185	12	
	187	11	187	18	
	193	9	193	16	
	198	13	199	15	
	200	10	200	16	
	201	5	201	13	
	201	23	202	13	
	211	23	212	24	
	220	4	220	18	
	221	24	222	1	
	222	5	222	9	
	222	15	223	9	
Drummond, Tyler					
	42	4	42	12	
	53	23	53	25	
	54	5	54	10	
	54	15	54	22	
	59	17	60	6	
	65	23	66	4	
	82	25	83	2	
	93	24	94	3	
	102	15	102	21	
	107	11	107	17	
	107	25	108	2	
	112	22	113	2	
	126	13	127	5	
	156	10	156	20	
	186	6	186	11	
	212	5	212	7	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	212	10	212	23	
	232	4	232	24	
	233	10	234	9	
	245	25	246	2	
	251	2	251	7	
	252	10	252	23	
	254	18	254	24	
Fairfax, Anthony					
	25	15	26	2	
Giusti, Joseph					
	15	1	15	25	
	17	8	17	11	
	23	8	23	10	
	23	20	24	11	
	24	16	25	11	
	27	3	27	10	
	34	13	35	1	
	42	11	42	18	
	43	9	43	22	
	47	8	47	11	
	64	16	65	2	
	66	20	66	23	
	73	20	73	23	
	75	12	75	16	
	88	16	89	7	
	89	12	89	15	
	89	22	90	17	
	101	9	101	14	
	115	2	115	10	
	126	19	126	23	
	134	17	135	2	
	136	24	137	11	
	139	25	140	7	
	144	11	144	18	
	145	4	145	10	
	148	3	148	7	
	148	20	149	1	
	153	12	153	15	
	160	18	161	4	
	162	14	162	16	
	165	9	165	19	
	170	23	171	16	
	173	15	174	1	
	186	6	186	10	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	187	17	188	4	
	191	8	191	17	
	192	20	194	2	
	195	4	195	9	
	208	12	209	1	
	233	3	234	1	
	234	24	235	22	
	243	19	243	23	
	244	5	244	16	
	250	14	250	23	
	266	11	266	15	
	267	25	268	7	
	272	25	273	11	
	276	12	276	22	
	279	11	279	17	
	282	16	282	19	
	283	13	283	20	
	284	2	284	13	
	284	20	284	21	
	285	13	285	15	
	286	13	287	1	
	287	13	288	3	
	290	11	291	4	
	292	20	293	3	
	302	16	302	25	
Henry, Mark					
	61	10	61	17	
	67	9	67	11	
	68	24	69	12	
	69	16	71	7	
	93	9	93	14	
	94	23	95	2	
	146	9	146	11	
	159	23	159	25	
	160	6	160	18	
	162	20	163	20	
	200	21	201	4	
	219	16	219	24	
	228	22	228	23	
	234	12	234	18	
	235	3	235	19	
	236	21	237	8	
	241	3	241	10	
	272	20	272	23	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
Johnson, Cheryl					
	35	12	35	25	
	36	17	37	9	
	38	5	39	21	
	40	1	40	11	
	41	16	41	22	
	42	13	43	4	
	47	24	48	8	
	54	15	54	25	
	100	19	101	23	
	103	10	104	3	
	105	1	105	7	
	105	20	106	14	
	131	16	132	2	
	132	3	132	6	
	137	24	138	5	
	141	23	143	2	
	154	12	154	17	
	156	1	156	14	
	166	2	166	20	
	168	22	169	19	
	194	10	194	21	
	196	6	196	10	
	204	16	204	22	
	206	14	207	11	
	208	4	208	22	
	211	4	211	24	
	212	7	212	17	
	212	25	213	19	
	214	11	215	1	
	215	21	216	5	
	218	7	219	17	
	229	16	229	24	
Lofton, Lucretia					
	52	4	52	21	
	60	16	61	5	
	103	16	105	14	
	106	19	107	5	
	111	8	112	3	
	166	24	168	12	
	173	24	175	4	
	184	6	185	19	
	187	7	187	19	
	189	7	189	25	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	193	6	194	5	
	200	3	202	7	
	219	5	219	15	
	220	10	221	8	
	227	7	227	10	
	231	17	233	8	
	234	24	235	3	
	266	6	267	4	
	269	9	272	19	
	322	9	323	10	
	324	14	325	1	
	332	22	333	15	
Martinez, Dianna					
	24	15	24	24	
	26	9	26	13	
	26	25	27	20	
	30	16	31	10	
	31	2	31	6	
	32	15	33	12	
	36	11	36	17	
	36	21	37	12	
	42	7	43	5	
	44	7	44	10	
	50	9	51	12	
	52	18	53	24	
	61	7	62	19	
	66	19	67	2	
	67	21	67	24	
	73	25	74	21	
	76	8	76	20	
	79	1	80	4	
	80	20	81	10	
	81	20	82	4	
	84	6	84	9	
	84	16	84	24	
	84	16	85	5	
	92	10	92	20	
	97	4	97	19	
	100	1	100	12	
	102	17	104	4	
	103	4	103	8	
	103	18	103	23	
	107	13	109	10	
	110	3	110	5	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	110	16	112	5	
	112	13	113	6	
	114	16	115	1	
	117	13	118	2	
	127	21	128	1	
	128	15	128	17	
	130	3	130	9	
	133	10	133	24	
	134	3	134	17	
	141	14	143	18	
	150	7	151	13	
Oldham, Dale					
	55	1	57	7	
	58	6	59	18	
	62	24	65	8	
	67	7	69	3	
	77	23	79	9	
	79	15	81	16	
	81	20	84	25	
	86	14	86	25	
	87	5	87	15	
	89	7	89	16	
	90	11	93	11	
	95	4	95	25	
	96	5	98	7	
	99	5	101	15	
	102	10	109	11	
	110	2	110	5	
	110	18	111	23	
	112	9	114	17	
	114	25	115	5	
	117	10	119	21	
	119	22	120	4	
	120	5	120	8	
	120	18	126	14	
	126	19	127	6	
	127	7	128	1	
	128	16	129	13	
	132	4	133	1	
	133	19	136	25	
	138	1	139	6	
	139	24	140	22	
	142	24	144	25	
	146	18	147	8	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	155	3	156	12	
	156	21	158	15	
	160	4	162	1	
	162	24	163	16	
	163	25	164	9	
	199	21	201	16	
	202	17	203	12	
	205	7	207	1	
	207	21	208	19	
	211	15	212	16	
	212	22	213	12	
	216	3	218	9	
	220	25	221	20	
	222	23	226	2	
	226	12	228	14	
	229	3	230	1	
Oskooij, Kassra					
	61	7	61	18	
	64	20	65	3	
	66	15	66	22	
	69	11	69	18	
	74	11	74	15	
	75	6	76	2	
	87	2	89	3	
	96	20	97	20	
	100	4	100	11	
	101	2	102	6	
	103	1	103	18	
	107	3	107	6	
	107	18	108	7	
	110	16	110	22	
	112	11	112	22	
	113	5	115	22	
	116	6	117	11	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	121	19	122	3	
	126	3	126	6	
	133	6	133	13	
	134	8	134	22	
	137	2	137	11	
	143	16	146	15	
	168	2	174	7	
	180	17	181	21	
	187	19	188	18	
	190	4	191	9	
	192	9	193	3	
	193	18	194	4	
Owens, Mark					
	154	19	155	23	
	156	6	156	11	
	156	13	156	17	
	157	25	158	20	
	159	6	160	20	
	169	7	169	17	
	178	5	179	6	
	179	13	180	7	
	182	19	182	25	
	224	19	225	4	
	248	16	249	13	
	249	20	250	16	
	304	17	305	9	
Petteway, Terry					
	43	9	44	2	
	62	25	63	5	
	65	6	65	9	
	71	22	72	3	
Phillips, Leon					
	32	6	32	10	
	35	1	37	7	
	45	13	45	23	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	50	1	50	20	
	52	24	53	1	
	57	20	58	1	
	61	21	62	9	
	61	21	62	10	
	62	20	65	21	
	67	17	70	21	
	73	5	74	2	
	73	10	75	15	
	76	4	78	15	
	76	14	78	11	
	79	5	79	25	
	80	7	80	21	
	85	3	85	5	
	85	12	86	15	
	101	3	101	15	
	103	2	103	19	
	122	23	123	9	
Pope, Penny					
	32	10	33	12	
	36	3	36	16	
	38	15	38	23	
	42	13	42	21	
	62	13	63	13	
	65	6	66	8	
	66	24	68	8	
	75	5	75	25	
	92	24	93	17	
	99	2	99	25	
	99	21	99	25	
	101	8	103	19	
	103	24	104	10	
	104	15	104	24	
	120	22	121	6	
	128	12	130	21	
	133	2	134	3	
	134	20	135	4	
Rice-Anders, Barbara					

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	74	25	75	2	
	80	17	81	2	
	87	2	88	9	
	90	19	93	24	
	94	4	96	15	
	110	21	111	25	
	113	19	113	23	
	118	23	119	16	
Rose, Derreck					
	31	12	31	22	
	32	3	33	7	
	33	19	33	21	
	36	19	36	24	
	41	10	41	13	
	50	2	50	8	
	51	9	52	14	
	54	7	54	25	
	55	21	56	13	
	57	23	58	5	
	60	6	61	4	
	62	8	62	18	
	62	23	71	9	
	75	5	76	12	
	79	5	79	25	
Shannon, Michael					
	19	19	19	20	
	21	3	21	12	
	33	24	34	10	
	36	22	37	23	
	40	19	40	19	
	44	6	44	11	
	56	3	56	19	
	56	25	57	25	
	63	13	63	16	
	81	11	81	20	
	87	11	87	18	
	88	1	88	7	
	94	2	96	13	
	96	17	96	20	
	97	7	98	1	
	101	14	102	9	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	104	23	104	24	
	105	2	105	25	
	106	8	106	11	
	106	15	106	19	
	113	3	113	15	
	115	18	117	1	
	118	4	118	9	
	122	22	122	24	
	123	2	123	24	
	125	1	125	25	
	126	18	127	7	
	128	10	128	15	
	131	15	133	3	
	133	6	134	3	
	134	22	135	17	
	136	17	137	6	
	162	23	163	2	
	166	7	166	11	
	168	20	168	23	
Sigler, Nathan					
	18	18	18	19	
	21	2	21	3	
	21	7	21	14	
	43	4	43	16	
	49	8	49	11	
	49	19	51	3	
	51	13	51	20	
	52	3	52	8	
	52	10	52	20	
	53	20	53	25	
	57	5	57	6	
	57	14	57	19	
	60	24	60	25	
	61	1	61	3	
	62	6	62	13	
	64	20	65	2	
	66	20	66	23	
	67	19	68	18	
	69	13	69	23	
	70	3	70	9	
	74	4	74	6	
	75	14	75	19	
	75	25	76	1	
	76	23	77	8	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	78	4	78	13	
	83	15	83	22	
	84	21	86	16	
	87	16	88	25	
	89	13	89	17	
	89	23	90	9	
	91	13	91	16	
	92	4	92	6	
	92	20	92	21	
	93	2	93	5	
	121	10	122	10	
	139	19	140	3	
	144	23	146	18	
	150	1	150	5	
	155	21	156	8	
	194	19	195	10	
	202	6	202	22	
	209	14	209	17	
	212	13	212	16	
	233	21	233	25	
	234	8	234	11	
Sullivan, Dwight					
	27	2	27	4	
	42	10	42	18	
	46	8	46	11	
	125	4	125	14	
	178	19	179	8	
Toliver, Patricia					
	15	14	15	20	
	18	3	18	6	
	18	15	18	19	
	22	7	23	13	
	28	5	28	11	
	28	5	28	25	
	37	5	37	9	
	37	17	37	25	
	44	24	46	15	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	46	4	46	15	
	46	23	46	25	
	49	9	50	1	
	50	4	51	18	
	89	21	90	8	
	91	10	91	22	
	99	9	99	14	
	99	19	101	2	
	102	12	103	4	
	105	19	106	2	
	106	22	107	15	
	109	21	109	24	
	111	10	111	17	
	113	19	114	1	
	114	15	115	8	
	121	25	122	3	
	122	24	123	4	
	122	24	123	12	
	132	2	132	5	
	132	16	134	13	
	144	15	146	7	
	145	23	146	12	
	146	18	146	24	
	149	6	150	2	
	192	14	192	20	
	195	3	196	6	
	197	7	197	11	
	215	4	215	9	
	216	24	217	13	
	224	15	224	19	
	226	17	226	21	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
Trounstine, Jessica					
	84	4	84	16	
	86	11	87	3	
	97	5	97	10	
	98	15	99	3	
	149	15	153	11	
	157	21	158	4	
Williamson, Roxy Hall					
	21	4	21	23	
	27	8	27	19	
	29	12	29	15	
	31	3	31	7	
	32	13	32	18	
	38	23	38	25	
	39	7	39	9	
	40	5	40	12	
	41	18	42	4	
	43	10	43	17	
	46	21	47	9	
	49	13	49	18	
	56	7	56	14	
	56	21	56	24	
	68	5	69	19	
	74	4	74	10	
	78	7	78	11	
	78	15	79	6	
	79	13	79	24	
	89	18	90	5	
	93	4	93	15	
	94	3	94	13	
	95	13	95	22	
	107	12	107	18	
	108	11	108	21	
	108	24	108	25	
	111	2	111	15	
	111	16	112	9	
	115	2	115	20	
	116	4	116	7	

Exhibit A**Defendants' Deposition Designations***Petteway v. Galveston County*

Deponent	Defendants' Designations/Counterdesignations				Notes
	PgFrom	LnFrom	PgTo	LnTo	
	116	22	117	7	
	117	16	117	25	
	118	1	118	17	
	118	18	121	8	
	134	18	135	14	
	147	24	148	12	
	155	4	155	18	
	155	19	155	23	
	156	7	156	12	
	156	22	156	25	
	183	18	184	4	
	185	11	186	19	
	189	19	190	17	
	190	18	191	4	
	191	5	191	8	
	191	9	191	19	
	191	20	192	2	

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
General Objection Applicable to All Depositions					Defendants object to use of any exhibits reviewed in designated testimony unless they are entered into evidence	
					Defendants object to inclusion of counsel discussion of ACP and other sidebar	
					Defendants reserves the right to assert objections on the record	
Apffel, Darrell						
	22	21	23	6		
	23	17	23	20		
	31	12	31	15		
	37	12	39	5		
	43	13	43	25		
	47	14	47	17		
	64	2	64	10		
	68	2	70	18		
	79	4	79	24		
	81	17	81	25		
	86	2	88	9		
	88	10	89	12		
	91	4	91	17		
	91	18	91	21		
	95	5	95	14		
	95	15	96	23		
	97	9	97	10		
	99	5	99	11		
	103	6	103	9		
	103	24	104	6	103:24-104:6: no question	
	106	12	106	23		
	107	23	108	11		
	112	6	114	15		
	115	6	116	6		
	117	14	117	16		
	117	17	119	13		
	126	6	127	13		
	127	20	127	20		
	127	21	129	9		
	129	10	130	3		
	132	20	133	2		
	133	3	139	22	133:24-134:10; 134:5-136:4; 136:16-136:23: Sidebar; Includes Objections on ACP	
	140	2	141	16	139:23-141:3; 141:9-141:16: Sidebar; Includes Objections on ACP	
	142	2	142	12	142:6-142:12: Sidebar; Includes Objections on ACP	
	146	7	148	2		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	148	3	148	7		
	149	3	149	18		
	150	7	151	10	150:7-151:10: Sidebar; Includes Objections on ACP	
	157	23	158	14		
	161	6	161	22		
	162	9	162	21		
	166	17	166	24		
	167	3	168	2		
	169	14	169	23		
	170	15	170	22		
	170	23	171	4		
	175	1	175	14		
	176	15	176	23		
	177	8	179	2		
	179	7	181	1		
	183	19	184	1		
	184	2	184	22		
	186	11	188	6		
	188	9	189	2		
	190	10	191	8		
	191	13	192	7		
	192	24	193	8		
	198	17	200	10		
	208	25	209	4		
	213	19	215	3		
	217	1	217	13		
	217	14	217	23		
	217	24	218	11		
	218	21	219	1		
	220	13	221	4		
	221	25	223	4		
	225	7	225	7		
	226	1	227	5		
	230	3	230	8	230:3-231:25: Speculation	
	230	9	231	25	230:3-231:25: Speculation	
	237	9	237	16		
	238	25	239	7		
	251	17	252	21		
	258	22	259	8		
	260	6	261	12		
	263	1	264	12		
	264	13	265	15		
	270	8	270	14		
	278	24	280	12		
	282	18	283	22		
	283	23	284	7		
	286	1	287	9		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	289	10	289	15		
	292	14	293	5		
	294	1	294	5		
	295	8	296	16		
	296	17	297	15		
	301	18	303	10		
	303	21	304	19		
	305	10	306	11	305:10-306:11: Relevance	
	306	12	308	15		
	308	16	310	6		
Armstrong, Robin						
	17	20	17	25		
	20	10	21	8		
	22	9	22	23		
	23	17	23	19		
	25	4	25	18		
	27	11	27	18		
	28	7	28	23	28:17-28:23 Speculation	
	29	9	30	14		
	35	14	15	20		
	41	13	42	2		
	43	8	44	6		
	44	9	44	11		
	45	5	45	16		
	47	1	47	6		
	48	19	49	17		
	49	22	50	14		
	55	12	55	23		
	56	8	57	23		
	59	23	60	2		
	62	5	63	18		
	66	16	66	25		
	68	7	68	22		
	69	12	70	19	69:12-69:17 Vague; Ambiguous	
	70	22	71	9		
	73	2	73	18		
	74	3	75	2		
	76	14	76	20		
	78	15	78	24		
	82	5	82	10		
	86	12	86	16		
	87	23	88	17		
	91	1	91	4		
	91	25	92	4		
	92	7	92	24		
	93	9	93	22	Vague; Ambiguous; Assumes facts not in evidence	
	95	14	95	21		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	97	10	97	13		
	97	18	99	19		
	101	12	101	19		
	103	10	103	21		
	111	15	111	25	Speculation	
	116	22	117	8		
	119	18	120	5		
	120	23	121	5		
	124	20	125	4		
	132	3	132	7		
	135	8	135	25		
	137	5	137	13		
	138	17	139	2		
	147	1	147	6		
	148	19	149	24	149:16-149:24 Speculation; Asked and answered	
	153	7	153	24		
	159	21	160	21	160:10-160:21 Legal conclusion; Improper hypothetical; Assumes facts not in evidence; Vague; Ambiguous	
	162	3	162	13		
	163	1	163	7		
	164	1	164	17		
	165	14	165	17		
	170	1	170	25	170:13-170:25 Speculation	
	172	4	172	10		
	174	2	174	5		
	176	10	177	2		
	178	23	179	14		
	181	5	181	17		
	190	15	193	19	190:25-191:18 Relevance; Includes reference to ACP dispute; 192:15-193:02 Misstates prior testimony	
	201	12	202	3		
	205	12	206	3	205:12-205:25 Optional Completeness	Plaintiffs' designation corrected for completeness
	207	11	207	13		
	211	9	211	14		
	221	1	222	20	222:05-222:20 Speculation; Vague; Ambiguous	
Barreto, Matthew						
	36	1	39	8	Unreliable Opinion Evidence (FRE 702)	
	40	14	40	25	Unreliable Opinion Evidence (FRE 702)	
	43	7	45	6	Unreliable Opinion Evidence (FRE 702)	
	49	24	54	6	Unreliable Opinion Evidence (FRE 702)	
	55	19	59	6	Unreliable Opinion Evidence (FRE 702)	

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	69	2	71	24	Unreliable Opinion Evidence (FRE 702)	
	77	2	79	13		
	79	21	83	10	Unreliable Opinion Evidence (FRE 702)	
	83	14	89	7	Unreliable Opinion Evidence (FRE 702)	
	89	11	90	16	Unreliable Opinion Evidence (FRE 702)	
	91	2	91	17	Unreliable Opinion Evidence (FRE 702)	
	92	3	97	24	Unreliable Opinion Evidence (FRE 702)	
	102	7	105	2	Unreliable Opinion Evidence (FRE 702)	
	106	16	110	6	Unreliable Opinion Evidence (FRE 702)	
	111	15	112	14	Unreliable Opinion Evidence (FRE 702)	
	123	17	124	24	Unreliable Opinion Evidence (FRE 702)	
	130	2	133	9	Unreliable Opinion Evidence (FRE 702)	
	133	24	135	6	Unreliable Opinion Evidence (FRE 702)	
Bryan, Thomas						
	11	15	25	12		
	26	12	33	14		
	37	3	40	16		
	43	19	45	14		
	53	13	53	16		
	63	5	63	18		
	67	8	68	18		
	69	17	71	19		
	73	13	75	19		
	86	18	87	14		
	88	2	88	16		
	94	8	95	12		
	104	12	105	4		
	107	5	107	16		
	108	9	109	17		
	110	1	110	13		
	111	21	112	11		
	113	4	114	8		
	114	19	117	9		
	121	17	122	5		
	124	15	125	13		
	126	12	128	6		
	128	16	129	18		
	130	19	131	19		
	133	9	133	18		
	141	2	142	12		
	144	12	144	16		
	145	1	152	6		
	155	11	157	5		
	158	16	158	21		
	161	17	162	21		
	163	13	167	17		
	178	5	179	17		
	180	3	180	19		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	184	6	185	8		
	191	1	191	7		
	192	2	192	12		
	195	6	201	10	195:6-195:13 Vague; Foundation 196:18-197:2 Compound 198:14-199:12 Compound; Foundation 200:18-201:10 Speculation; Incomplete Hypo	
	213	1	213	7	213:1-213:7 Speculation; Incomplete Hypo	
	214	14	216	5		
	217	1	217	18	217:1-217:7 Vague	
	219	1	219	20		
	223	4	224	13		
	226	12	228	14		
	229	19	231	12	226:12-227:14 Relevance	
	233	1	233	16		
Compian, Joe						
	26	16	27	6		
	27	18	28	10		
	29	22	30	13	30:1-30:13: Non-responsive; Relevance	
	39	12	40	3	39:12-40:3: Speculation	
	43	11	44	7		
	51	16	52	4		
	58	18	64	1		
	64	13	65	17		
	65	24	66	3		
	68	16	68	23		
	69	6	69	19		
	87	9	93	21	88:17-89:24: Non-responsive 90:21-92:17: Non-responsive	
					92:18-93:21: Non-responsive; Speculation	
	99	8	99	19		
	99	22	100	8		
	100	18	101	8		
	102	1	102	15	102:1-102:15: Speculation	
	105	1	105	18		
	106	16	108	14	106:25-107:12: Non-responsive 107:13-107:23: Speculation	
	117	12	118	11	117:18-117:25: Speculation	
	120	16	121	7	120:16-120:25: Non-responsive	
	138	25	139	8		
	139	17	139	23	Relevance (FRE 402)	
	141	16	141	18		
	171	17	171	23		
	172	7	172	12		
	172	21	173	7		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	175	21	179	16	176:18-178:9: Hearsay; Speculation; Non-responsive	
	186	16	186	25		
	190	9	191	5		
	194	11	195	7	194:11-195:07: Speculation; Hearsay	
	196	20	197	17	197:01-197:17: Hearsay	
	199	8	201	6		
	210	5	210	14		
	211	18	211	24		
	213	1	217	24	217:10-217:24: Speculation	
	218	7	218	14	218:7-218:14: Speculation	
	240	22	241	25		
	250	12	250	21		
	250	22	251	21	251:2-11: Non-responsive; Relevance (FRE 402); Hearsay	
	289	3	289	13		
Cooper, William						
	37	24	38	1	Unreliable Opinion Evidence (FRE 702)	
	38	17	38	22	Unreliable Opinion Evidence (FRE 702)	
	44	21	44	24	Unreliable Opinion Evidence (FRE 702)	
	50	1	50	14	Unreliable Opinion Evidence (FRE 702)	
	56	3	56	7	Unreliable Opinion Evidence (FRE 702)	
	56	3	56	7	Unreliable Opinion Evidence (FRE 702)	
	56	15	56	18	Unreliable Opinion Evidence (FRE 702)	
Courville, Edna						
	11	17	12	19		
	14	20	15	8		
	16	21	16	23		
	17	25	18	5		
	26	4	26	20		
	28	22	29	4		
	34	9	34	16		
	35	25	36	4		
	36	20	37	21		
	40	3	42	20		
	42	23	43	1		
	44	5	45	11		
	50	22	51	7		
	56	7	57	4		
	57	14	59	16		
	79	18	79	24		
	80	17	82	3		
	94	9	94	24		
	97	21	97	23		
	99	9	99	20		
	101	9	101	21		
	101	25	102	3		
	102	10	102	21		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	103	6	103	9		
	105	17	105	23		
	106	24	106	11		
	110	25	111	2		
	112	6	113	14		
	114	5	114	20		
	118	10	118	18		
	120	24	121	17		
	123	18	124	5		
	132	14	132	23		
	137	19	137	21		
	141	4	141	9		
	143	12	143	16		
	146	1	148	25		
	167	9	167	22		
	169	3	169	14		
	185	15	185	19		
	186	23	187	10	Nonresponsiveness; No Question; Speculation (FRE 602)	
	189	3	189	9	Nonresponsiveness; Relevance (FRE 401)	
	193	7	193	8	Nonresponsiveness; Relevance (FRE 401)	
	194	8	194	22		
	196	3	196	16		
	197	5	197	11	195:5-197:11: Relevance	
	197	21	198	12		
	199	16	200	9		
	204	2	206	2		
	206	19	211	21		
	212	25	215	14		
Drummond, Tyler						
					Global objection - witness will be live at trial, so his testimony through deposition is not necessary	
					Global objection to designation of testimony he does not know about, lacks personal knowledge about. This is improper testimony by questioning counsel. To the extent you believe you will need information for cross examination, these designations are improper at this point.	
					Global objection to designation of attorney exchanges, they are not testimony or evidence.	
	34	15	35	7		
	36	6	39	1		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	40	7	41	19		
	41	23	42	3	41:5-41:18: Attorney exchange	
	42	13	44	21	43:12-43:25: Attorney exchange	
	52	15	53	2		
	53	15	53	20		
	54	1	54	4		
	54	11	54	14		
	54	23	54	25		
	55	3	55	3		
	55	17	55	20		
	56	15	57	17		
	60	7	61	16		
	66	14	67	9		
	68	3	68	15		
	74	11	77	11	76:2-76:3: Objection, withdrawn	
	79	4	79	23		
	80	12	82	4		
	83	3	83	15		
	84	5	90	2	84:8-85:10: Attorney exchange	
					88:14-88:20: Attorney exchange	
					89:2-89:9: Question not answered	
					89:10-90:2: Attorney exchange	
	92	13	93	23		
	94	4	95	3	94:15-94:15: Objection, withdrawn	
					94:23-95:3: Speculation	
	97	14	97	16	97:14-97:16: Object to exhibit - email does not include Mr. Drummond, no personal knowledge, no foundation	
	97	23	98	14	97:23-98:14: Object to exhibit - email does not include Mr. Drummond, no personal knowledge, no foundation, also no questions posed other than what the document states	
	99	1	102	6	99:1-99:23: No personal knowledge, not relevant, speculation	
					100:10-100:14: Article exhibit contains hearsay	
					100:15-100:24: Attorney exchange, no questioning	
					100:25-102:6: Questions about article are irrelevant, article's statements are hearsay, Mr. Drummond lacks personal knowledge, no foundation	
	105	1	106	3	105:5-105:16: Object to exhibit - email does not include Mr. Drummond, no personal knowledge, lacks foundation	
	107	4	107	10		
	108	12	110	11		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	110	23	112	21		
	114	8	115	13		
	115	19	118	19	117:1-117:4: Objection [sic] withdrawn, answer already designated at 116:25	
	119	3	121	21	120:16-121:11: Object to exhibit that did not include Mr. Drummond, no personal knowledge or foundation, also object to inclusion of attorney exchange	
	122	2	124	1	122:1-123:3: Object to use of privilege log exhibit, lack of foundation and no personal knowledge re: exhibit and questions about it	Plaintiffs did not designate 122:1
	129	10	129	16	129:10-129:16: Cumulative, already designated at 65:23-66:4	
	130	25	132	1	131:7-131:17: Not relevant, calls for speculation about how comments were compiled, no personal knowledge	
	132	13	132	24		
	133	6	133	12		
	137	10	138	19	138:8-138:21: No personal knowledge, not relevant, no foundation	Plaintiffs did not designate 138:20-21
	148	18	148	24		
	150	7	152	5		
	154	25	156	4		
	159	9	164	6	161:4-161:14: No personal knowledge, no foundation	
	164	21	166	16		
	168	11	170	17		
	171	3	178	25	173:24-174:4, 5: Argumentative, includes request for clarification	
	180	1	181	1		
	181	6	181	13		
	187	2	187	16		
	188	10	188	23		
	192	21	194	2	192:21-192:24: Object to article content as hearsay	
					192:25-193:11: Witness-Attorney exchange, not testimony	
					193:22-194:2: Only designates recitation of hearsay from exhibit, no question or answer	
	196	23	200	15	196:23-197:04: Designated a question the witness asked for clarification on	
					198:5-198:25: Attorney exchange	
					199:9-199:15: Objection, withdrawn	
					200:2-200:4: Objection, withdrawn	
					200:11-200:14: Objection, withdrawn	

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	200	20	201	4		
	201	18	202	11		
	209	19	210	25		
	219	21	220	13		
	222	6	223	24		
	234	10	234	17	234:15-234:16: Objection, withdrawn	
	234	21	237	10	234:23-235:3: Attorney exchange	
	237	15	239	8	237:17-237:23: Objection, withdrawn, attorney exchange	
	239	12	240	13	239:12-239:16: Attorney statement, no question	
					239:19-239:23: Attorney-witness exchange	
					240:12-240:13: Attorney statement, references exhibit without any designated questions	
	242	15	244	10		
	248	4	248	19	248:7-248:10: Objection withdrawn, attorney exchange	
	249	1	250	15		
	254	25	255	19	254:25-256:2: Attorney statement, no question	Plaintiffs did not designate 255:20-256:2
	257	14	261	17	259:16-261:4: Attorney exchange, witness request for clarification	
Giusti, Joseph						
					Global objection - witness will be live at trial, so his testimony through deposition is not necessary	
					Global objection to designation of testimony he does not know about, lacks personal knowledge about. This is improper testimony by questioning counsel. To the extent you believe you will need information for cross examination, these designations are improper at this point.	
	11	21	12	13		
	13	1	14	17		
	16	1	17	7		
	18	8	19	23		
	20	11	23	7	20:13-20:16: Objection, withdrawn	
	25	12	27	2		
	28	5	29	15	29:2-29:9: Exchange over objection, irrelevant and duplicative since question is asked and answered at 30:7-10	
	30	7	30	24		
	33	13	34	8		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	44	3	45	14		
	47	19	52	21	50:23-51:25: Attorney exchange	
					52:4-52:10: Attorney objection (privilege)	
					52:14-52:21: Attorney objection (privilege)	
	53	2	53	21		
	54	13	57	12	55:18-55:24: Attorney objection (privilege)	
	59	5	60	25	60:17-60:24: Attorney objection (privilege)	
	61	7	64	15		
	65	12	65	21		
	66	24	68	3		
	68	14	68	19		
	69	14	69	25	69:19-69:25: Objection (already answered), question at 24-25 already answered at 14-18	
	71	5	73	19	73:11-73:13: Objection, withdrawn	
	74	15	75	11		
	76	16	78	23	77:22-78:7: Attorney objection (privilege)	
	83	1	85	16	83:14-83:23: Question re-phrased, attorney objection re: privilege;	
					84:20-85:3: Attorney objection (privilege)	
	87	9	87	12		
	87	16	88	15	87:20-87:24: Attorney objection (privilege)	
	90	24	92	25	90:24-90:25: Attorney comment, not a question	
	93	5	93	15		
	94	9	97	1	95:23-96:3: Attorney objection (privilege)	
					96:15-96:24: Attorney objection (privilege)	
	98	5	99	22		
	100	1	101	8		
	101	15	102	22		
	103	5	103	8		
	105	17	110	5	106:4-106:9: Question re-phrased, witness asked for clarification	
					106:15-106:19: Attorney objection (privilege)	
					107:11-107:15: Attorney objection (privilege)	

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
					109:14-110:2: Article exhibit contains hearsay, also lack of foundation, no personal knowledge	
	111	22	115	1	111:22 111:25: Article exhibit contains hearsay, also lack of foundation, no personal knowledge;	
					112:14-112:21: No personal knowledge, lack of foundation, exhibit contains hearsay	
					113:14-113:16: Question re-phrased	
	115	11	117	1	116:15-116:21: Object to consideration of article contents on basis of hearsay	
	117	23	119	2		
	119	22	121	25	119:22-120:9: Attorney objection (privilege), attorney exchange	
	123	9	124	11	123:20-124:4: Attorney objection, question rephrased	
	125	2	126	15	126:8-126:15: Asked and answered at 43:9-22 & 99:14-22, also answered at 126:19-23, cumulative	
	127	4	129	14		
	129	22	129	25		
	130	6	130	17		
	131	8	132	1		
	133	8	134	1		
	135	3	136	16		
	137	21	138	5		
	138	12	138	25	138:16-138:18: Attorney objection	
	140	8	142	1		
	142	12	143	13		
	143	18	144	10		
	145	18	148	2		
	148	8	148	14		
	149	2	149	22		
	150	7	150	11		
	151	4	151	8		
	151	21	152	14		
	152	24	153	3		
	153	24	157	3	155:11-155:21: Attorney objection (privilege)	
					156:15-156:18: Attorney objection, question rephrased	
	157	19	158	18		
	158	19	158	25		
	159	17	160	2		
	161	5	161	15		
	163	4	163	14	163:9-163:14: Attorney objection (privilege)	

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	163	25	165	2		
	165	20	166	8		
	166	11	170	12	166:11-167:7: Attorney objection (privilege)	
					167:14-167:17: Attorney objection (privilege)	
					167:24-168:8: Attorney objection (privilege)	
	171	17	172	25		
	174	2	176	9	175:4-175:5: Objection, withdrawn	
	178	25	179	3		
	183	1	183	12		
	185	16	186	5		
	186	11	187	2		
	188	5	191	4		
	191	18	191	20		
	194	3	195	1		
	195	18	196	9		
	196	14	198	5		
	198	14	203	12	198:19-198:20: Exhibit 12 article - hearsay, object to admission to prove truth of the matters asserted	
	204	15	207	5		
	207	18	208	4		
	211	18	212	3	211:18-212:3: Attorney comment, not a question	
	220	11	221	19	220:11: Exhibit 16 article - hearsay	
	229	7	229	24		
	234	2	234	23		
	236	5	236	13	236:5-236:13: Attorney comment, not a question	
	240	2	240	11	240:4-240:9: Attorney objection (privilege)	
	242	7	243	18		
	252	12	252	24		
	254	17	258	4	254:17-255:1: Asked and answered at 135:6-24, cumulative	
	258	18	264	6	259:19-260:6 Object to transcript exhibit, this is old uncorrected version	
					260:10-261:10: Reading from transcript, hearsay	
					263:2-263:17: Speculation	
	265	15	266	10	265:15-265:24: Object to reading from transcript for purposes of truth of the matter asserted	
	266	22	267	18		
	268	16	269	18		
	269	25	272	7		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	272	17	272	24		
	273	12	274	9		
	275	17	275	19		
	277	10	277	22		
	279	18	280	2		
	282	1	282	15		
	284	22	285	7		
	285	16	286	12		
	288	4	288	11		
	289	25	290	10		
	291	5	292	19		
	295	10	301	19	295:10-296:10 Attorney objection (privilege), question rephrased;	
					296:19-297:1 Attorney objection (privilege)	
					297:13-298:18 Attorney objection (privilege)	
					298:23-299:10 Attorney objection (privilege)	
					299:12-300:12 Attorney objection (privilege)	
					300:23-301:9 Attorney objection (privilege)	
	302	1	302	8	302:1-302:302:8: Attorney objection (privilege), he also answered at 302:23-25	
Henry, Mark						
	12	2	12	19		
	13	11	15	8		
	15	13	15	17		
	17	14	17	18		
	18	15	18	18		
	22	24	23	16		
	24	12	25	22		
	29	7	29	13		
	30	12	30	19		
	42	13	42	15		
	43	7	43	12		
	43	16	43	19		
	46	15	46	22		
	49	13	49	17		
	49	24	51	20		
	52	4	52	10		
	53	2	53	15		
	53	22	54	20		
	57	20	58	1		
	59	21	60	7		
	61	7	61	9		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	63	15	63	22		
	66	3	66	16		
	67	7	67	8		
	68	10	68	18		
	68	21	68	24		
	69	13	69	15		
	71	23	72	1		
	72	19	73	25		
	74	8	74	21		
	74	23	75	6		
	77	21	77	25		
	78	6	78	8		
	78	25	79	7		
	79	11	81	6		
	82	25	84	22		
	92	12	92	25		
	93	5	93	9		
	93	15	93	17		
	94	2	94	10		
	94	20	94	22		
	100	5	100	9		
	100	17	101	9		
	103	9	103	15		
	115	20	117	11		
	119	1	119	4		
	119	21	121	10		
	124	12	124	17		
	125	20	125	22		
	126	20	126	25		
	127	21	137	18	127:21-128:4: Speculation	
					137:12-137:18: Speculation	
	139	2	139	18		
	140	9	146	8	141:5-145:9: Sidebar; Includes Objections on ACP	
	146	12	146	18		
	147	6	148	11		
	152	20	153	15		
	155	4	155	10		
	155	15	156	1		
	158	23	159	22		
	160	1	160	5		
	163	21	166	10		
	169	14	170	7		
	171	20	173	13		
	174	20	175	4		
	175	8	175	11		
	184	22	185	6		
	195	7	195	12		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	195	22	196	1		
	196	23	196	25		
	197	1	197	7		
	197	17	198	3		
	198	23	200	4		
	200	15	200	20		
	201	5	201	22		
	203	1	203	10		
	204	21	205	21	204:21-205:21: Sidebar; Includes Objections on ACP	
	206	16	211	15		
	212	7	212	23		
	213	1	213	1		
	213	13	214	14		
	214	19	214	22		
	215	1	215	4		
	217	13	217	16		
	217	21	218	17		
	219	5	219	15		
	219	25	220	6		
	221	22	221	25	221:22-222:3: Misstates testimony	Plaintiffs did not designate 222:1-222:18
	222	19	222	25	222:19-222:25: Misstates testimony and argumentative	
	224	4	225	1		
	225	23	226	6		
	227	3	228	9	228:3-228:9: Speculation	
	228	14	228	21		
	228	24	229	21		
	230	4	230	6		
	230	23	231	25		
	232	8	232	20		
	233	3	233	13		
	233	22	234	2		
	235	21	236	20		
	238	3	238	8		
	238	11	238	23		
	240	7	240	9		
	240	17	240	19		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	241	11	243	11	241:20-243:2: Sidebar; Includes Objections on ACP	
	244	20	247	7	245:4-245:21: Sidebar; Includes Objections on ACP	
	247	21	247	23		
	248	5	248	13		
	249	12	249	20		
	255	15	256	4		
	257	3	257	12		
	258	4	258	7		
	258	15	259	1		
	260	12	267	4	260:12-267:4: Sidebar; Includes Objections on ACP	
	268	13	269	1		
	270	23	271	4		
	272	8	272	19		
	272	24	274	16		
	275	23	276	2		
	276	16	278	12		
	288	22	290	1		
	290	14	290	17		
	292	1	292	3		
	292	10	292	18		
	293	19	294	4		
	295	11	296	9		
	296	23	297	10		
	297	17	297	22		
	301	4	302	9		
	304	8	305	20		
	306	1	306	18		
	307	3	307	6		
	310	21	311	8		
	316	7	317	5	316:7-317:5: Relevance	
	318	8	318	24		
	321	14	322	6		
	324	8	324	11		
	325	8	325	14		
	330	13	330	18		
	330	25	333	9	331:6-331:11: Speculation 332:4-333:4: Speculation	
	333	13	335	6		
	335	21	336	20		
	341	23	343	5		
	345	15	345	24	345:15-345:24: Sidebar; Includes Objections on ACP	
	347	13	347	20		
	350	2	352	12		
	352	22	353	15		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	360	12	361	8		
	364	3	365	1	364:3-365:1: Hearsay; relevance	
	372	16	373	5	372:16-373:5: Speculation; Relevance	
	373	9	373	13	373:9-373:13: Sidebar; Includes Objections on ACP	
Johnson, Cheryl						
	19	8	19	12		
	22	6	22	25	22:16-22:21: Objection, question rephrased	
	34	22	35	4		
	36	1	36	7		
	38	22	39	25		
	43	5	43	18		
	43	19	43	25		
	44	1	45	22		
	46	22	47	8		
	48	20	49	3		
	49	16	50	20		
	52	23	53	8		
	55	22	56	13		
	56	21	58	2		
	58	14	59	11		
	59	12	60	2		
	60	21	62	4	61:21-62:2: Objection, withdrawn	
	62	5	62	9		
	62	18	63	4		
	63	5	63	14		
	63	15	64	11		
	64	14	65	4		
	65	5	66	11		
	67	18	69	1	68:13-69:1: Speculation as to other entities/offices	
	70	16	71	14		
	71	17	71	17		
	71	23	72	4		
	72	18	73	8		
	74	5	74	16		
	74	16	76	7		
	76	8	77	6		
	77	10	77	17		
	77	18	79	2		
	79	3	80	1		
	80	2	80	14		
	82	3	83	11		
	84	14	85	10		
	86	3	86	17		
	89	7	89	12		
	89	13	90	17		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	90	20	91	14		
	91	15	93	1		
	93	2	93	13		
	94	10	94	20		
	101	24	103	9	102:8-102:13: Request for clarification, question withdrawn	
	109	6	110	3		
	114	15	115	3		
	124	4	124	25		
	125	23	127	13		
	129	1	130	13		
	131	13	132	2	131:13-131:15: Question clarified	
	134	16	136	12		
	137	6	137	23		
	139	1	139	10		
	139	17	139	25		
	140	3	141	11		
	143	10	143	23		
	145	5	145	16	145:10-145:14: Attorney objection	
	146	5	147	24	146:25-147:5: Question clarified	
	151	12	151	21		
	151	22	153	2		
	153	3	153	23		
	155	3	155	19		
	157	7	157	21	157:7-157:8: Attorney comment, not part of question	
	159	13	160	7		
	161	23	165	19	162:7-162:19: Attorney-witness exchange, article comments are hearsay	
	168	12	168	21		
	169	9	169	12		
	177	23	179	4		
	190	24	192	24	191:1-191:4: Reporter-witness-attorney comments	
	194	22	195	15		
	195	16	195	24		
	197	3	199	2	197:6-197:10: Reporter-attorney comments	
	199	5	200	16	199:16-199:20: Reporter-attorney comments	
	200	22	202	3		
	202	4	203	5		
	203	15	204	15		
	204	23	205	7		
	207	12	208	2		
	227	15	228	10	228:4-228:6: Attorney objection	
Lofton, Lucretia						

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	50	8	51	14	Lay Opinion Testimony; undisclosed data; foundation	
	53	24	54	12		
	60	4	60	8	Lay Opinion Testimony; undisclosed data; foundation	
	63	10	63	21		
	69	7	70	18		
	71	5	71	19		
	76	1	76	10		
	79	21	80	18		
	86	23	87	9		
	96	14	96	25	Foundation; lay opinion	
	165	18	166	23		
	170	22	171	11		
	174	25	175	21	Nonresponsive	
	180	17	181	15	Foundation; Hearsay	
	182	5	182	24	Foundation; Hearsay	
	211	25	213	5		
	219	16	220	7		
	221	9	222	1		
	227	11	230	19	Hearsay	
	233	9	234	11		
	274	24	276	13	Late Designation; Lack Foundation for Lay Opinion (FRE 701); Speculation (FRE 601)	
	292	21	292	25		
	293	14	293	24		
	309	9	309	22		
	310	11	311	9		
	313	19	314	11	Hearsay	
	316	24	320	11		
	321	3	322	8		
	323	18	324	8	Lack Foundation for Lay Opinion (FRE 701); Speculation (FRE 601)	
	325	2	327	12	Hearsay	
	328	12	330	12	Prejudicial 403; Relevance 401-402; Hearsay	
	331	3	332	21		
Martinez, Dianna						
	18	21	19	8		
	24	6	24	14		
	30	2	30	15		
	30	16	31	6		
	31	11	32	8		
	32	15	35	5		
	36	11	36	20		
	44	11	45	17		
	47	21	48	20		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	52	18	52	21		
	59	8	59	25		
	66	6	66	18		
	67	3	67	20		
	69	5	69	12		
	80	5	80	19		
	81	11	81	19		
	84	10	84	24		
	85	6	85	19		
	86	7	86	20		
	87	1	87	9		
	88	3	89	1		
	95	18	97	3		
	97	20	98	10		
	103	4	104	10		
	114	2	114	15		
	115	2	115	8		
	117	6	117	12		
	122	16	122	18		
	125	2	126	20		
	128	10	129	19		
	130	10	133	24		
	134	18	135	22		
	136	15	137	21		
	138	18	138	25		
	141	14	143	6		
	143	8	143	18		
	149	23	150	6		
	151	14	151	19		
Oldham, Dale						
	16	5	17	17	16:5-20: Relevance (FRE 401)	
	25	11	25	21	25:11-21: Relvance (FRE 401)	
	31	5	33	15		
	34	15	38	15	36:18-40:17: Relevance (FRE 401)	
	38	21	38	23	36:18-40:17: Relevance (FRE 401)	
	39	17	40	22	36:18-40:17: Relevance (FRE 401)	
	41	15	41	25	36:18-40:17: Relevance (FRE 401)	
	43	4	43	16		
	45	4	48	15	Relevance (FRE 401)	
	49	9	51	3	Relevance (FRE 401)	
	51	14	53	8		
	55	1	57	7		
	57	25	60	5		
	60	24	70	1	Incomplete: Add 70:3	
	70	16	71	10		
	71	24	73	6	72:11-74:10; Relevance (FRE 401)	
	73	13	74	10	72:11-74:10; Relevance (FRE 401)	
	74	19	75	7	72:11-74:10; Relevance (FRE 401)	

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	75	19	85	8		
	85	14	85	21	Incomplete: Add 85:22-86:3	
	86	4	86	13		
	88	24	89	6		
	101	16	106	6		
	106	10	106	25		
	107	16	109	20		
	110	6	110	9		
	110	18	112	2		
	112	6	114	24		
	115	6	116	3		
	117	3	118	24		
	119	3	119	21		
	120	16	122	6		
	122	9	126	18		
	127	7	128	1		
	129	11	129	18		
	131	3	131	15		
	132	4	133	8		
	133	11	134	3		
	134	10	135	20		
	136	13	138	6		
	139	24	141	18		
	142	2	144	15		
	145	19	146	12		
	148	21	150	23		
	151	20	153	14		
	153	21	154	6		
	154	20	159	5	158:20-159:5 - Misstates Testimony; Assumes Facts	
	159	25	161	8		
	162	2	162	25		
	163	3	163	20		
	166	10	167	12		
	168	8	168	13		
	169	25	173	21	Relevance (FRE 401)	
	175	19	176	13		
	176	18	176	19		
	177	3	177	6		
	177	11	178	14		
	187	21	187	25		
	190	6	190	20		
	193	8	193	13		
	195	21	196	1		
	199	10	200	15		
	200	19	200	23		
	202	17	202	23		
	202	25	203	7		

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	203	13	203	14		
	203	24	204	13		
	205	23	206	6		
	207	13	209	16		
	201	19	210	23		
	211	6	211	25		
	212	17	212	21		
	214	3	216	8		
	224	25	225	20		
	231	10	232	4		
	232	10	232	20	232:10-233:2 - Mischaracterizes Testimony and assumes facts; Speculation (FRE 601)	
	232	25	233	6	233:4-23: Assumes Facts; Speculation (FRE 601)	
	233	9	233	17	233:4-23: Assumes Facts; Speculation (FRE 601)	
Oskooii, Kassra						
	64	14	64	19	Unreliable Opinion Evidence (FRE 702)	
	68	22	69	10	Unreliable Opinion Evidence (FRE 702)	
	74	2	74	10	Unreliable Opinion Evidence (FRE 702)	
	96	5	98	4	Unreliable Opinion Evidence (FRE 702)	
	99	12	101	1	Unreliable Opinion Evidence (FRE 702)	
	102	7	105	16	Unreliable Opinion Evidence (FRE 702)	
	106	18	107	2	Unreliable Opinion Evidence (FRE 702)	
	107	7	107	17	Unreliable Opinion Evidence (FRE 702)	
	113	1	113	4	Unreliable Opinion Evidence (FRE 702)	
	180	5	180	16	Unreliable Opinion Evidence (FRE 702)	
Owens, Mark						
	178	3	178	4	No answer provided	
Phillips, Leon						
	85	18	85	23	Not a counter-designation; new exhibit questioning	
Rice-Anders, Barbara						
	77	17	80	16	Nonresponsive; Speculation	
	224	11	225	24	Calls for legal conclusion, expert testimony	
	298	11	303	18	Nonresponsive; Speculation	
Rose, Derreck						
	50	9	50	14	Relevance As Incomplete (FRE 401)	
Sullivan, Dwight						
	90	11	90	19	90:15-90:19 Speculation	
Toliver, Patricia						
	30	5	31	3	Relevance (FRE 401); Side-Bar with no question or answers	
	46	16	46	25	Relevance (FRE 401); Side-Bar with no question or answers	
	53	4	53	25	53:4-54:2: Relevance	

Deponent	Plaintiffs' Designations/Counterdesignations				Defendants' Objections	Notes
	PgFrom	LnFrom	PgTo	LnTo		
	115	9	115	22	Nonresponsive; Speculation (FRE 601)	
Trounstine, Jessica						
	83	11	83	16	Unreliable Opinion Evidence (FRE 702)	
	84	17	85	1	Unreliable Opinion Evidence (FRE 702)	
	86	9	86	10	Unreliable Opinion Evidence (FRE 702)	
	87	4	87	5	Unreliable Opinion Evidence (FRE 702)	
	98	5	98	14	Unreliable Opinion Evidence (FRE 702)	
	99	4	99	13	Unreliable Opinion Evidence (FRE 702)	