

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

FILED  
MAR 28 2022  
JOHN T. FREY  
Clerk of the Circuit Court  
of Fairfax County, VA

JOHN C. DEPP, II

*Plaintiff and Counterclaim  
Defendant,*

v.

AMBER LAURA HEARD,

*Defendant and  
Counterclaim Plaintiff.*

Civil Action No.: CL-2019-0002911

**PLAINTIFF AND COUNTERCLAIM DEFENDANT JOHN C. DEPP, II'S  
CORRECTED DESIGNATIONS OF DEPOSITIONS**

COMES NOW Plaintiff and Counterclaim Defendant John C. Depp, II ("Plaintiff"), by counsel, and pursuant to the Section XI of the Scheduling Order entered by this Court, submits the following designations of the depositions, taken in this action, as deposition testimony that Plaintiff may introduce at trial, through video and audio display and/or via reading of the transcript. Plaintiff reserves the right to withdraw any of these designations and/or to supplement these designations as appropriate, including to the extent warranted based on any rulings of the Court or any counter-designations submitted by the defendant. Plaintiff further notes that, although the Scheduling Order does not require the designation of party depositions, Plaintiff specifically reserves the right to use any and all portions of Defendant and Counterclaim Plaintiff Amber Laura Heard's ("Defendant") deposition transcript and video at trial, for any and all purposes, and, to the extent required, the entirety of Defendant's depositions are deemed designated.

**Laurel Anderson, Ph.D., CCN**  
**2/21/22 Deposition**

<b>DESIGNATIONS</b>		<b>OBJECTIONS</b>	<b>COUNTER DESIGNATIONS</b>
<b>From Page/Line</b>	<b>To Page/Line</b>		
9/17	9/22		
12/18	13/14		
40/7	40/11		
50/5	53/3		
60/13	61/16		
61/20	62/21		
63/9	64/9		
65/14	66/13		
69/21	70/10		
70/22	72/7		
72/13	72/19		
73/3	74/6		
74/18	75/11		
76/4	76/6		
76/14	76/17		
78/6	78/16		
87/3	87/10		
90/3	92/17		
93/5	94/2		
94/14	95/10		
95/18	96/5		
98/4	101/8		
101/13	102/21		
103/11	104/21		
107/8	107/13		
107/21	108/7		
109/3	109/10		
110/2	111/14		
112/13	113/21		
115/7	116/1		
116/3	117/2		
117/10	119/11		
120/2	121/8		
121/10	121/14		
123/7	123/16		
124/7	124/11		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
125/1	125/8		
125/16	125/19		
125/21	126/6		
127/3	130/12		
131/4	131/14		
132/19	133/8		
134/2	136/6		
136/17	137/1		
137/21	138/5		
139/6	140/18		
140/22	142/13		
142/18	143/7		
144/11	144/21		
148/5	149/10		
149/22	150/7		
151/8	152/7		
152/9	156/22		
157/2	157/20		
160/7	160/9		
168/7	170/5		
170/8	170/18		
170/20	172/3		
174/19	175/6		
176/14	180/3		
182/21	183/19		
184/20	185/8		
187/21	188/2		
189/16	189/19		
190/10	191/1		
200/14	202/1		
202/10	203/12		
210/16	210/19		

**Isaac Baruch**  
**11/20/19 Deposition**

<b>DESIGNATIONS</b>		<b>OBJECTIONS</b>	<b>COUNTER DESIGNATIONS</b>
<b>From Page/Line</b>	<b>To Page/Line</b>		
11/25	12/23		
13/6	13/10		
13/20	14/3		
14/18	16/25		
19/15	22/17		
24/10	27/16		
28/17	28/23		
30/1	30/10		
34/23	36/8		
39/11	44/23		
48/10	49/21		
51/16	52/17		
53/18	55/1		
55/19	58/17		
58/23	61/5		
64/25	66/18		
68/25	69/13		
69/25	70/3		
70/9	71/9		
73/19	73/20		
74/8	74/24		
77/5	77/18		
81/25	83/3		
111/18	112/4		
158/1	158/19		
167/24	168/1		
180/23	180/25		
185/14	186/15		
186/23	187/7		

**Robin Baum**  
**1/20/22 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
10/7	10/11		
11/17	13/5		
14/21	15/2		
98/19	99/17		

**Sean Bett**  
**1/25/22 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
18/7	18/21		
21/6	21/20		
23/6	23/11		
24/3	24/5		
24/10	26/15		
27/9	29/8		
31/3	36/6		
46/15	49/16		
71/9	71/14		
95/1	95/14		
101/7	101/19		
102/6	102/9		
103/10	108/4		
109/14	110/10		
111/12	111/16		
116/12	117/8		
118/10	119/16		
120/1	120/19		
121/4	122/17		
127/21	128/14		
132/2	132/10		
132/16	136/4		

**Dr. Connell Cowan**  
**12/8/21 Deposition**

<b>DESIGNATIONS</b>		<b>OBJECTIONS</b>	<b>COUNTER DESIGNATIONS</b>
<b>From Page/Line</b>	<b>To Page/Line</b>		
10/7	10/8		
10/12	10/19		
13/3	14/8		
26/14	26/16		
26/20	27/1		
140/19	142/11		
163/20	165/4		
165/19	176/1		
176/18	176/20		
177/6	178/10		
179/17	181/4		
184/8	187/12		
188/6	192/5		
192/16	193/16		
195/13	202/20		
203/5	207/18		
210/7	231/3		
231/14	233/18		
234/5	235/4		
235/21	240/13		
240/21	241/6		
242/6	243/20		
244/16	245/22		
246/5	248/5		
248/10	249/1		
250/7	251/16		
251/21	252/14		
252/18	253/14		
258/6	258/21		
271/19	274/8		
277/20	278/18		
279/12	280/6		
280/19	281/3		
283/9	284/10		
284/18	288/7		
289/1	289/8		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
289/21	292/8		
320/11	321/4		

**Candie Davidson-Goldbronn, Designated Representative  
3/30/21 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
20/9	21/15		
24/3	25/4		
77/3	78/16		
79/16	81/1		
83/14	85/10		
91/5	91/22		
92/10	92/23		
94/1	97/17		
98/8	99/21		
102/10	102/24		
109/3	109/12		
115/22	116/4		
116/19	117/18		
119/4	119/10		
120/7	120/25		
121/1	121/13		

**Christi Dembrowski  
2/22/22 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
36/13	37/4		
39/21	42/2		
59/20	61/2		
109/12	110/9		
110/22	112/19		
148/6	148/19		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
166/7	166/22		
202/13	203/18		

**Stephen Deuters**  
**2/24/22 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
14/6	15/19		
18/8	18/16		
99/22	100/16		
101/8	102/4		
102/21	104/21		
124/7	124/17		
125/9	125/18		
141/3	141/8		
141/13	141/22		
142/2	142/6		
193/21	195/7		
195/19	195/21		
196/10	196/14		
234/13	235/15		

**Officer Christopher Diener (Serial No. 41436)**  
**11/23/21 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
8/15	9/21		
11/15	12/17		
33/8	33/17		
35/4	36/16		
81/18	83/8		
87/17	87/20		
101/7	102/14		
138/19	142/9		



DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
143/1	143/14		
144/7	147/10		
147/15	148/7		
148/18	149/10		
150/2	153/20		
153/21	156/18		

**Laura Divenere**  
**1/15/21 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
7/21	8/6		
9/9	9/16		
10/2	10/4		
23/17	24/9		
55/7	55/17		
73/2	73/14		
73/19	73/22		
74/17	74/19		
75/4	75/16		
76/14	77/5		
77/18	78/2		
78/4	78/10		
78/22	79/2		
80/17	82/12		
82/19	82/22		
83/10	83/14		
87/16	87/19		
88/19	89/1		
89/8	89/16		
90/21	91/9		
92/7	92/12		
92/16	93/3		
93/9	93/17		
97/21	98/9		
104/4	104/17		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
104/21	105/19		
106/2	106/7		
113/16	113/20		
114/7	114/13		
115/2	115/21		
116/20	117/2		
117/7	118/4		
118/16	118/22		
119/2	119/13		
119/15	119/20		
125/9	125/21		
126/7	126/13		
138/10	138/17		
139/6	141/19		
143/17	144/3		
145/18	147/1		
147/3	147/4		
147/8	147/10		
147/17	148/9		
148/16	148/19		

**Terence Dougherty  
12/2/21 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
12/2	12/7		
16/1	16/14		
18/6	19/3		
23/11	23/16		
26/17	28/19		
29/4	30/1		
30/6	32/14		
33/1	33/15		
35/22	36/15		
67/11	69/8		
69/19	70/11		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
72/9	72/21		
73/21	74/17		
76/5	76/10		
90/18	93/12		
101/12	101/22		
120/12	120/21		
126/12	126/18		
128/1	130/18		
131/6	133/3		
133/10	135/5		
135/17	157/1		
157/13	158/2		
158/13	159/22		
162/7	163/22		
164/2	164/5		
166/8	166/21		
167/3	167/4		
167/17	169/2		
171/2	173/16		
176/4	176/13		
178/9	179/19		
180/4	183/1		
183/9	184/6		
184/15	186/12		
187/20	188/7		
194/21	196/2		
198/16	199/10		
200/5	201/2		
201/8	204/11		
205/11	206/5		
206/19	208/3		
217/5	217/8		
220/2	223/17		
224/7	226/7		
230/6	237/13		
238/14	239/7		
262/20	266/16		
268/2	268/21		
271/1	271/8		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
271/18	274/1		
274/18	275/11		
282/9	296/11		
297/3	299/5		
302/17	303/13		
312/8	317/2		
359/7	365/6		
366/1	366/8		
366/22	368/14		
372/13	377/5		
378/20	380/7		

**Joshua Drew  
11/19/19 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
8/15	8/17		
10/17	10/25		
11/11	12/25		
13/2	15/10		
16/24	18/7		
18/17	20/12		
22/6	22/20		
22/23	24/11		
24/15	24/25		
25/17	28/8		
28/14	28/17		
30/11	31/5		
31/13	33/18		
35/11	35/24		
36/9	36/14		
37/15	38/7		
40/10	40/24		
42/15	42/20		
43/1	43/10		
45/6	45/14		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
47/21	48/4		
49/2	49/7		
49/13	49/23		
50/14	55/7		
55/18	56/19		
58/19	59/12		
59/23	60/15		
62/5	62/7		
62/13	63/5		
63/11	63/19		
64/17	66/11		
67/12	67/24		
73/14	73/19		
74/1	74/6		
85/18	86/8		
91/10	91/25		
108/7	108/11		
110/13	110/15		
113/21	114/20		
115/14	116/3		
257/11	257/22		

**Erin Falati**  
**2/4/22 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
8/16	8/19		
9/3	9/5		
27/11	29/5		
29/14	29/19		
30/19	32/3		
32/19	33/20		
39/4	39/18		
54/3	57/8		
58/12	59/9		
69/1	69/13		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
8/16	8/19		
9/3	9/5		
70/1	71/11		
72/1	72/14		
72/20	75/20		
79/22	82/1		
83/10	83/12		
93/20	95/18		
106/14	110/18		
111/6	111/17		
119/19	124/7		
124/14	124/20		
125/8	125/22		
134/21	135/3		
137/16	140/15		
141/12	142/2		
142/11	144/3		
144/22	145/13		
146/9	146/21		
167/6	167/22		
192/2	192/10		
194/18	195/10		
196/2	200/4		
200/6	200/19		
201/2	203/9		
204/10	205/4		
205/14	206/15		
207/17	208/2		
208/11	211/17		
211/22	214/1		
214/16	215/4		
216/2	218/10		
218/12	220/18		
221/22	223/1		
223/16	230/8		
230/20	233/2		
233/5	234/5		
234/7	236/10		
237/4	238/5		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
8/16	8/19		
9/3	9/5		
238/9	239/8		
239/22	240/20		
242/5	242/17		
243/2	244/12		
245/4	245/19		
246/2	250/13		
251/4	252/21		
253/1	256/20		
257/7	258/9		
261/4	263/2		
264/4	267/5		
267/17	268/14		
268/16	269/10		
269/17	271/14		
272/2	273/9		
275/10	278/3		
279/2	283/7		
283/10	287/8		
287/17	289/21		
294/15	298/11		
298/18	301/14		
301/21	302/13		
308/13	308/17		
309/1	310/20		
311/19	312/15		
313/1	313/4		
313/12	313/22		
314/2	314/3		
314/20	316/5		
316/16	320/4		
320/9	322/11		
322/16	323/3		
323/13	325/1		
327/1	327/12		

**Officer William Gatlin (Serial No. 41437)**  
**11/23/21 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
8/18	9/4		
27/4	28/1		
52/2	52/15		
58/28	59/8		
75/15	75/19		

**Eric George**  
**4/5/21 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
11/11	12/2		
134/5	135/6		
136/9	136/19		
137/14	140/8		
140/21	142/18		
143/12	144/16		
146/1	146/8		

**Officer Tyler Hadden**  
**3/11/21 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
9/22	10/3		
11/4	11/9		
14/3	14/17		
26/15	27/1		
91/5	92/12		
93/7	93/15		
139/8	141/10		
191/12	192/21		
194/4	198/12		



DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
198/14	201/13		
201/15	202/2		
202/16	203/7		
203/14	203/20		
204/17	207/12		
207/17	208/14		
208/12	209/3		
210/20	211/21		
212/4	213/17		
214/2	214/15		
245/7	245/10		

**Whitney Henriquez**  
**2/3/22 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
42/20	46/14		
47/4	47/18		
49/13	50/10		
52/3	52/8		
58/3	59/22		
60/15	61/18		
63/20	64/19		
80/13	82/12		
154/20	155/5		
156/1	158/19		
159/10	160/8		
162/3	162/19		
163/2	165/21		
165/22	173/8		
173/15	177/22		
184/21	185/18		
186/14	186/19		
201/5	203/20		
205/16	206/3		
226/14	228/14		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
239/1	241/10		
242/3	242/12		
243/16	243/22		
247/1	249/19		

**Jennifer Howell, Corporate Designee & Individually  
2/26/21 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
12/5	12/14		
29/6	30/13		
163/17	164/12		
168/13	169/18		
172/17	175/4		
178/12	179/18		
180/11	181/7		
182/5	182/10		

**Jennifer Howell, Corporate Designee & Individually  
3/3/22 Deposition, Volume 2**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
229/1	229/14		
231/3	231/20		
235/17	236/11		
241/17	242/11		
247/8	247/19		
251/18	252/14		
253/2	253/7		
254/3	255/14		
256/9	256/20		
264/20	266/3		
272/19	274/17		
280/5	280/12		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
284/1	285/6		
292/18	294/3		
298/14	298/17		
299/3	299/11		
311/15	312/3		
318/5	318/16		
319/2	319/9		
320/18	321/20		
324/12	326/18		
327/21	328/21		
343/13	344/11		

**Melanie Inglessis**  
**2/2/21 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
8/13	9/1		
9/6	9/22		
63/10	64/3		
121/17	122/1		
133/21	137/2		
141/16	142/15		
148/6	148/20		
154/20	155/3		
159/19	160/8		
160/15	160/18		
177/10	177/21		
195/18	195/21		
206/6	206/19		
207/4	207/8		

**Tracey Jacobs**  
**1/28/21 Deposition**

<b>DESIGNATIONS</b>		<b>OBJECTIONS</b>	<b>COUNTER DESIGNATIONS</b>
<b>From Page/Line</b>	<b>To Page/Line</b>		
9/16	10/6		
17/11	17/19		
19/4	20/7		
47/13	48/16		
132/21	134/12		
135/9	135/22		
150/8	150/22		
151/3	151/13		
151/17	152/6		
152/9	152/13		
152/16	152/19		
152/22	153/4		
153/7	153/15		
157/11	157/20		
169/6	170/5		
170/8	170/15		
170/18	173/15		
180/4	180/14		
180/22	181/6		
181/9	181/15		
181/19	182/1		
182/3	182/3		
182/19	183/1		

**Katherine O. James**  
**2/18/22 Deposition**

<b>DESIGNATIONS</b>		<b>OBJECTIONS</b>	<b>COUNTER DESIGNATIONS</b>
<b>From Page/Line</b>	<b>To Page/Line</b>		
10/10	10/15		
24/3	25/4		
25/16	27/11		
30/8	30/10		
30/14	32/6		
36/11	36/18		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
38/4	38/8		
40/8	41/7		
41/20	42/3		
44/12	45/11		
48/10	48/12		
48/17	49/11		
51/4	51/9		
52/3	53/6		
53/8	53/21		
54/3	54/5		
54/17	55/4		
55/9	55/18		
70/21	71/3		
72/4	72/17		
76/6	76/19		
98/9	98/22		
104/6	104/20		
105/6	105/11		
117/6	125/22		
126/2	129/9		
130/7	132/14		
132/17	138/11		
138/14	139/5		
139/8	139/16		
140/3	143/2		
143/4	143/5		
144/17	144/22		
145/8	149/9		
149/16	161/16		
161/20	163/21		
164/7	164/17		

**David Kipper, M.D.**  
**2/22/21 Deposition**

<b>DESIGNATIONS</b>		<b>OBJECTIONS</b>	<b>COUNTER DESIGNATIONS</b>
<b>From Page/Line</b>	<b>To Page/Line</b>		
8/9	8/16		
10/5	10/20		
18/19	20/8		
20/14	20/20		
21/4	21/15		
29/13	30/9		
31/2	31/9		
31/16	31/22		
32/11	33/4		
33/19	34/10		
35/6	35/9		
36/12	37/18		
40/13	41/1		
41/7	41/21		
45/9	46/9		
46/14	48/15		
48/22	49/20		
52/15	53/1		
61/12	62/4		
63/1	64/10		
65/1	65/9		
95/17	95/22		
107/7	107/19		
112/17	113/2		
113/20	114/14		
114/19	119/10		
120/11	120/21		
137/12	138/7		
178/6	180/1		
180/9	180/20		
182/2	182/10		
182/13	184/18		
186/20	187/13		
188/11	190/8		
191/10	192/6		
194/22	195/17		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
203/2	203/17		
213/9	215/5		
215/16	220/6		
221/21	225/3		
226/21	227/6		
228/8	229/3		
230/2	235/19		
240/5	242/22		
243/2	245/9		
245/16	246/16		
246/18	249/18		
255/2	255/10		
257/2	259/13		
264/7	265/2		
268/4	268/17		

**Michelle Mulrooney  
3/1/21 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
8/20	9/4		
9/19	10/20		
12/2	12/4		
13/13	13/14		
14/2	15/2		
15/7	15/9		
16/4	16/9		
16/21	17/10		
19/15	19/21		
24/20	24/21		
25/1	25/21		

**Tina Newman, Designated Representative**  
**2/11/22 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
35/17	35/19		
38/1	38/9		

**Brandon Patterson, Corporate Designee**  
**3/2/22 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
12/8	13/3		
49/8	49/15		
90/9	91/5		
92/11	93/2		
93/12	94/1		
96/8	97/3		
98/10	99/11		
101/5	101/19		
103/8	103/20		
104/6	104/12		
105/9	106/2		
106/19	107/10		
107/17	107/19		
108/1	108/14		
109/2	109/7		
110/12	110/20		
112/6	112/16		
113/11	114/3		
115/4	115/14		
116/13	117/5		
117/18	118/18		
120/8	120/11		
121/1	121/19		
122/4	122/17		
124/22	125/7		
125/14	125/18		
128/6	128/17		



DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
129/20	130/12		
158/22	159/5		
159/20	160/7		
163/7	163/12		
164/11	164/17		
178/13	178/15		
188/14	188/21		
189/16	190/3		
198/6	198/15		
201/9	203/2		
203/13	204/4		
204/11	205/5		
205/11	206/8		
206/16	207/4		
207/14	208/2		
208/13	208/15		
208/19	209/10		
209/15	211/12		
211/15	212/20		
213/5	213/22		
214/16	214/18		
215/8	215/21		
216/5	216/14		
217/2	221/5		
221/16	221/22		
222/4	223/4		
225/6	226/11		

**Raquel Rose Pennington**  
**1/20/22 Deposition, Volume 1**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
8/6	8/14		
9/1	9/7		
12/4	12/12		
15/10	15/23		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
16/9	16/11		
18/1	18/9		
18/19	18/25		
19/3	19/11		
21/11	21/13		
23/24	23/25		
25/2	25/7		
25/25	27/6		
28/25	30/25		
31/2	33/3		
33/15	33/17		
38/14	39/21		
39/25	40/7		
43/16	44/4		
44/14	44/18		
46/11	47/18		
48/12	48/21		
49/23	50/5		
50/10	50/25		
51/9	54/20		
55/21	56/2		
57/14	58/20		
58/25	59/25		
62/12	62/14		
62/23	63/9		
64/18	65/25		
66/22	67/9		
67/11	68/1		
68/15	69/13		
69/19	69/24		
70/2	70/7		
72/2	72/10		
72/14	72/23		
73/12	73/16		
75/7	75/10		
81/8	81/11		
82/8	82/11		
83/1	83/7		
83/15	84/1		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
84/18	85/5		
85/17	85/24		
86/23	87/5		
95/23	95/25		
96/12	97/16		
97/25	98/6		
98/14	99/7		
100/13	101/11		
123/24	126/2		
133/10	134/13		
136/15	137/23		
138/20	139/2		
140/6	140/12		
140/16	142/13		
145/12	146/12		
147/20	147/22		
148/6	148/11		
148/18	148/24		
149/7	149/18		
149/22	150/2		
150/14	150/23		
151/3	151/11		
151/18	151/25		

**Alejandro Romero**  
1/22/21

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
6/9	6/18		
7/18	8/1		
8/21	9/6		
21/3	21/5		
26/8	26/15		
67/4	67/19		
71/9	73/9		
75/8	75/10		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
80/1	80/16		
95/2	95/13		
96/19	97/6		
98/13	99/7		
105/12	105/18		
106/13	115/19		
116/6	137/3		

**Anthony Romero**  
12/15/21

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
9/9	9/12		
17/15	18/18		
19/8	19/19		
20/3	20/13		
20/18	21/9		
21/13	21/18		
24/17	25/3		
25/13	25/17		
26/14	30/13		
32/1	34/22		
36/4	36/11		
36/13	36/21		
37/1	37/10		
43/20	44/3		
46/6	47/6		
48/22	50/19		
51/16	51/22		
52/6	54/14		
56/16	57/3		
57/20	58/11		
59/10	60/1		
60/3	61/14		
62/6	63/19		
65/1	67/12		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
132/2	133/20		
148/1	148/11		
149/10	149/15		
150/5	152/10		
154/14	155/21		
161/5	163/6		
166/1	166/12		
181/18	182/7		
211/9	221/2		
221/16	221/20		
222/4	222/22		
223/20	224/2		
259/9	259/18		
273/21	274/11		
275/2	275/8		
275/16	276/22		
278/1	281/4		
292/14	297/3		
298/4	299/2		
300/14	301/9		
302/10	302/11		
302/16	308/9		
309/5	310/19		
312/13	313/1		
314/12	315/16		
316/7	316/22		
317/9	317/14		
358/20	359/13		
370/1	370/10		

**Officer Melissa Saenz  
3/31/21 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
10/19	11/6		
15/2	15/13		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
93/8	93/13		
100/16	100/21		
155/7	155/13		
237/20	238/12		
239/4	243/4		
243/12	248/4		
249/6	255/11		
256/18	258/17		
259/1	265/8		
265/18	267/16		
269/1	271/17		
272/3	274/4		
274/19	274/12		
275/21	277/5		
277/9	279/6		
279/7	280/6		
280/17	280/22		
281/15	282/15		
285/12	286/18		
287/4	288/22		
289/14	293/8		
294/5	294/12		
294/14	295/15		
315/10	318/19		
319/1	330/15		
331/13	336/5		
336/7	336/20		
337/2	340/14		

**Sarabi Rami**  
**3/2/22 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
8/1	8/6		
15/15	17/15		
17/21	18/13		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
18/21	19/18		
68/17	69/21		
70/3	70/6		
70/15	70/21		
73/1	74/10		
83/1	84/9		
85/7	87/19		
88/21	89/12		
93/8	94/5		
95/20	96/9		
97/7	97/12		

**Kristina Sexton  
12/18/19 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
9/5	10/21		
12/12	14/5		
16/2	16/7		
105/3	114/16		
117/3	118/13		
122/2	123/16		
147/23	148/24		

**Monroe Tinker  
1/6/22 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
8/8	8/14		
9/11	9/21		
13/21	14/7		
15/6	15/12		
18/22	19/16		
20/6	21/3		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
22/21	23/8		
23/20	25/18		
29/12	30/16		
31/5	32/20		
35/17	36/18		
36/22	37/9		
41/3	41/19		
42/7	42/10		
46/22	50/13		
52/19	52/22		
55/14	57/20		
58/14	59/17		
60/4	61/1		
63/7	65/11		
67/12	68/11		
69/1	69/7		
70/11	70/18		
73/8	73/15		
75/8	76/20		
101/13	101/21		
111/4	114/2		
119/21	120/9		
123/13	124/12		
125/13	130/13		
130/15	134/1		
134/21	135/18		
136/1	138/11		
138/21	140/19		
141/1	150/14		
151/16	152/12		
152/22	154/11		
155/2	157/16		
158/7	158/20		
159/18	160/22		
161/2	161/9		
161/12	162/14		
163/16	166/10		
166/14	167/19		
168/8	169/13		



DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
171/22	174/6		
174/11	174/20		
179/8	179/12		
182/8	182/19		

**Adam Waldman**  
**2/15/22 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
11/3	11/20		
13/13	13/15		
14/18	14/20		
25/1	26/6		
112/6	112/9		
116/11	117/2		
117/21	118/14		
142/18	148/3		
148/16	150/9		
151/22	153/8		
159/7	163/15		
164/4	165/5		
169/21	171/2		
181/19	182/5		
183/9	185/2		
188/1	188/9		
201/13	201/21		
202/6	205/16		
206/1	206/16		
231/19	235/13		

**Laura Allison Wasser**  
**12/16/20 Deposition**

<b>DESIGNATIONS</b>		<b>OBJECTIONS</b>	<b>COUNTER DESIGNATIONS</b>
<b>From Page/Line</b>	<b>To Page/Line</b>		
69/1	70/5		
72/13	74/6		
74/9	75/8		
76/15	77/11		
100/4	100/21		
129/8	130/17		
134/1	136/6		
172/14	173/13		
186/21	187/16		
216/14	217/16		
218/9	219/12		
220/9	221/5		
230/6	231/19		

**Jack Whigham**  
**1/20/22 Deposition**

<b>DESIGNATIONS</b>		<b>OBJECTIONS</b>	<b>COUNTER DESIGNATIONS</b>
<b>From Page/Line</b>	<b>To Page/Line</b>		
9/6	9/17		
19/12	19/18		
21/18	22/14		
23/18	24/4		
29/22	30/7		
34/20	35/7		
35/20	37/13		
38/21	39/10		
39/20	40/8		
41/13	41/18		
43/18	44/15		
47/8	47/14		
74/7	75/10		
75/13	76/16		
80/4	81/14		
82/10	82/20		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
133/12	133/17		
133/20	134/3		
134/18	135/9		
136/12	136/21		
158/14	159/18		
160/4	160/11		
161/8	161/13		
162/1	162/11		
163/11	165/3		
169/8	169/15		
171/10	171/19		
172/11	173/22		
175/12	177/5		

**Edward White**  
**2/2/22 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
154/20	157/9		
158/8	158/15		

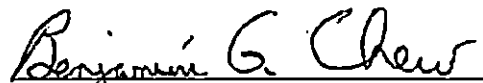
**Bruce Witkin**  
**2/17/22 Deposition**

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
6/8	6/20		
7/18	7/21		
10/11	10/13		
11/1	11/21		
12/1	12/17		
20/16	21/2		
92/14	92/18		
109/5	109/16		
125/13	127/12		

DESIGNATIONS		OBJECTIONS	COUNTER DESIGNATIONS
From Page/Line	To Page/Line		
146/19	147/16		
149/4	149/7		
153/7	153/18		

Dated: March 9, 2022

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I hereby certify that on this 9th day of March 2022, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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