

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II

*Plaintiff and Counterclaim
Defendant,*

v.

AMBER LAURA HEARD,

*Defendant and
Counterclaim Plaintiff.*

Civil Action No.: CL-2019-000291VA

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

PLAINTIFF AND COUNTERCLAIM DEFENDANT JOHN C. DEPP, II'S OBJECTIONS AND REBUTTAL-DESIGNATIONS OF DEFENDANT/COUNTERCLAIM PLAINTIFF AMBER LAURA HEARD'S DEPOSITION COUNTER-DESIGNATIONS FOR TRIAL

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 objections to Defendant's counter-designations of depositions, and Plaintiff's rebuttal 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 objections or designations and/or to supplement these objections or designations as appropriate, including to the extent warranted based on any rulings of the Court or any counter-designations submitted by the Defendant. Plaintiff specifically reserves the right to use as counter-designations all deposition excerpts affirmatively designated by him in this action, and incorporates his affirmative designations by this reference, as well as any additional affirmative designations that may be made. Plaintiff further reserves the right to supplement or otherwise amend his designations, counter-

designations, and objections as appropriate.

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; **ICE**=Improper Character Evidence; **IO**=Improper Opinion; **FSPK**= Lack of Foundation, Speculation, Lack of Personal Knowledge; **IH**=Incomplete Hypothetical; **IU**=Incomplete/ Unintelligible; **ICD**=Improper counter-designation; **VA**=Vague and ambiguous; **NC**=Needlessly cumulative; **ET**=expert testimony; **AR**=argumentative; **PK**=lack of personal knowledge; **IP**=Invades witnesses' right to privacy; **PRIV**=attorney-client privilege; **OB**=Overbroad.

**Deposition of Laurel Anderson, Ph.D., CCN
February 21, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
61	17-19		
68	20 (from "did") - 22	ICD, R	
69	1-7	ICD, R	
104	22	L, H, FSPK	105:13-16
105	1-2 [Replace "Exhibit 2" with Def Ex] 7-12	L, H, FSPK	105:13-16
119	12-13, 15, 20 and 22		
137	4-6 and 10-15	H, FSPK	137:16-20
198	6-8 and 14-15	198:6-8: IU, H	
204	21-22	ICD	204:12-20
205	1-13	ICD	204:12-20
206	10-13 and 16-22	206:10-13: ICD, L, VA, H FSPK 206:16-22: ICD, H, FSPK	
207	1-4	ICD, H, FSPK	

**Deposition of Isaac Baruch
November 20, 2019**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
84	9-11	R, ICD	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
	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	R, ICD	
86	22-25	R, ICD	
87	23-25	R, ICD	
88	1 2 (from "How") – 24	R, H, ICD	
89	8-15 and 17-25	R, H, ICD	
90	1-11 and 13-25	R, H, ICD	
91	1-25	R, H, SP, ICD	
92	1, 3-4 and 9-25	R, H, SP, ICD	
93	1-12 13 (from "did you have") – 25	R, SP, ICD	
94	1-7	R, ICD	
95	25	R, MIL, P, ICE, ICD	
96	1-11 and 13-25	R, MIL, P, ICE, ICD	185:23 (from "Have") – 25, 186:4-7
97	2 (through "there") 23-25	ICD, R, MIL, P, ICE	97:2-9
98	1-5 and 11-23	SP, IO, ICD	
99	11 (from "And") – 22	MS, AF, P, SP, AA, ICD	99:23-25, 97:2 (from "which") – 9, 98:24-99:3
100	5-12 and 16-25	MS, AF, P, SP, AA, ICD	99:23-25, 97:2 (from "which") – 9, 98:24-99:3
101	1-3 4 (from "after") – 8 15 (from "Johnny") – 17 18 (from "Was") – 19 (through "sleep") 20-25	1-3 AA, MS, SP, AF, MIL 15-17 SP, R ICD	101:9-13
102	1-15	MS, P, AA, ICD	
103	16 (from "Have") – 25	P, MIL, ICE, ICD	
104	1-11	P, MIL, R, SP, ICE, ICD	
105	8-19	P, MIL, R, SP, ICE, ICD	
106	12-21	P, MIL, R, SP, ICE, ICD	
109	16-18	ICD	
113	4-18 and 20 21 (from "When") – 25	R, ICD	
114	1 (through "out")	IU, ICD	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
115	17-22	AA, R, ICD	
117	6-9, 11-14 and 17-20 (through second "Yeah")	ICD	117:11-14
119	23-25	ICD	
120	1-2 and 13-18 (through "No") [Replace "Baruch Exhibit 2" with Def Ex] 21-23	ICD	
121	13-25 [Replace "Exhibit 2" with Def Ex]	ICD	
122	1-25	ICD	
123	1-13	ICD	
132	22-25	ICD	
133	1-5 (through "so") 16-25	ICD 133:1-5 SP, R, 133:16-25 MIL, R	133:5 (from "I mean") – 6 (through "know")
134	8 (from "Had")- 25	MIL, R, ICD	
135	1-25	MIL, R, ICD	
136	1-7, 10-22 and 24-25	MIL, R, SP, ICD	136:9
137	1-25	MIL, R, ICD	
138	1-7 and 11-25	MIL, R, ICD	138:8-9
139	1-3	MIL, R, ICD	
140	15-17 and 19-20	R, P, ICD	
141	15-25	R, P, ICD	
142	1-2	R, P, ICD	
148	18-19 [Replace "Exhibits 1 and 2" with Def Ex]	ICD, IU	
149	20-25	R, P, ICD	
150	1-4	R, P, ICD	150:16-151:12
153	1-10 and 21-25	ICD	
154	2-19 [Replace "Baruch Exhibit 1" with Def Ex]	SP, R, AA, ICD	
155	21-25 [Replace Baruch Exhibit 2" with Def Ex]	ICD	
156	1-8 and 11-19	SP, R, ICD	
158	20-25	SP, R, ICD	
159	1-2 (through "know") 11 (from "Let") - 25	R, ICD	158:2-10
160	10 [Replace "Baruch 2" with Def Ex] 12-25	ICD	
161	1-6 and 19-25	ICD	
162	1-25	ICD	
163	1-15	ICD	
173	12-21	ICD	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
174	9-12 and 18-20	ICD	
176	19 (From "I") – 25	ICD	
177	1-2 (through "door") 17-22	SP, ICD	
178	25 (from "you")	ICD	
179	1-10 (through "Yeah")	ICD	179:10-11 (through "know")
181	1-18 (through "No")	IH, SP, ICD	

**Deposition of Sean Bett
January 25, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
18	1	IU	
19	1-10	19:1-3: IU	
71	15 and 17-22	71:15-17: AA 71:19-22: R, NC	
108	19 and 22	VA, SP, H	
109	1-9	VA, SP, H	
110	11-22	110:16-22: ICD, H, FSPK	
113	1-7	ICD, IU	
120	20-22	VA	
121	2-3	VA	
126	3-19	126:18-19: ICD, IU, VA	
127	10-12 and 14-20	127:10-15: FSPK	
128	15-22	128:19-20: MIL, NC, R 128:21-22: MIL, H, AF	
129	1, 3-10 and 13-16	129:3-7: MIL, H, AF 129:8-14: FSPK	
130	1-7 and 22	FSPK	
131	2-7 and 10-11	131:5-11: AF, FSPK	
132	11-13		

**Deposition of Christian Carino, Volume 2
March 11, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
257	11 (from "And") – 13	ICD	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
352	19-22	ICD, P	
353	1-12	ICD	
354	3-12	ICD	

**Deposition of Connell Cowan
December 8, 2021**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
207	19-22	UN, R, VA	
208	1-9	UN, R, VA	
280	7-10 and 13-17		
282	9-14	R, UN, VA	
283	12-14		
316	5-6, 9-10 and 14-22	R, UN, VA, SP, H, ICD	
317	1-9 and 20-22	R, UN, VA, SP, H, ICD	
318	1-2 and 5-12	R, UN, VA, SP, H, ICD	
321	6-22		
322	1-3		

**Deposition of Christi Dembrowski
February 22, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
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	R; IR	
35	9-18	R; VA; H; SP; AF; FSPK	
36	1-2	R; VA; H; SP; AF; FSPK	
42	4-12	R; H; IR	
43	6-11	R; H; IR	43:12-17

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
44	8-9	R; AR; AF	
61	3-4 [Replace "Exhibit 4" with Def Ex]		
65	10-12, 14, 16-17, 20 and 22	R; H; IR;	
66	1-2 and 5 22 (from "And")	R; H; IR	66:18-20
67	1-3, 7, 9-12, 16 and 20-22	R; H; IR; MS; AR; AF	
68	3	R; H; IR; MS; AR; AF; AA	
69	3-10 and 16-17	IU; R; H; IR; MS; AR; SP; VA; AF	
84	13-19 and 22	IU; R; H; IR; MS; AR; SP; VA; AF	
86	8-9 and 14-15	IU; R; H; IR; MS; AR; SP; VA; AF	
88	21-22		
89	1 and 4		
91	17-22	IU; R; H; IR; MS; AR; SP; VA; AF	
92	1-4	IU; R; H; IR; MS; AR; SP; VA; AF	
94	12-16 and 21	IU; R; H; IR; MS; AR; SP; VA; AF	
95	1-4	IU; R; H; IR; MS; AR; SP; VA; AF	
96	15-17	IU; R; H; IR; MS; AR; SP; VA; AF	
97	1	IU; R; H; IR; MS; AR; SP; VA; AF	
98	6-8, 11-12 and 14-15	R; AF; VA; FSPK	
100	16-22	IU; R; H; IR; MS; AR; SP; VA; AF	
106	17-19 and 22	IU; R; H; IR; MS; AR; SP; VA; AF	
107	20-22	IU; R; H; IR; MS; AR; SP; VA; AF	
108	1-11 and 14	IU; R; H; IR; MS; AR; SP; VA; AF	
128	15 (from "I") – 18	R	
129	1-2	R	
130	7-9	R	
135	4 (from "And") – 9 18-22	IU; R; H; IR; MS; AR; SP; VA; AF	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
142	5-7 and 12-15	R	
143	2-3, 8 and 10-22	IU; R; H; IR; MS; AR; SP; VA; AF	
144	1-12	IU; R; H; IR; MS; AR; SP; VA; AF	
145	2-4, 9-12, 16 and 18-22	IU; R; H; IR; MS; AR; SP; VA; AF	
146	1-3 and 8	IU; R; H; IR; MS; AR; SP; VA; AF	
149	4-10 and 12	R; MS; P	
150	7-14, 16 and 18-22	IU; R; H; IR; MS; AR; SP; VA; AF	
151	1-7 and 12-13	IU; R; H; IR; SP	
154	11-13 and 15	R; AF	
155	5-15	IU; R; H; IR; MS; AR; SP; VA; AF; P	
156	8, 13 and 15-17	IU; R; H; IR; MS; AR; SP; VA; AF; P	
157	1-7, 12-14 and 18-21	IU; R; H; IR; MS; AR; SP; VA; AF; P	
158	2-3, 5-11, 14-16, 18-19 and 22	IU; R; H; IR; MS; AR; SP; VA; AF; P	
159	1, 3-8 and 11-12	IU; R; H; IR; MS; AR; SP; VA; AF; P	159:22-160:1
160	3-8 and 19-22	IU; R; H; IR; MS; AR; SP; VA; AF; P	
161	5-7 and 9-13	IU; R; H; IR; MS; AR; SP; VA; AF; P	
162	1-3, 7 and 10-12	IU; R; H; IR; MS; AR; SP; VA; AF; P	
167	16-17 [Replace "Exhibit 11" with Def Ex]		
169	7-9 [Replace "Exhibit 11" with Def Ex] 16 and 20-22	R; F/A; FSPK; H	
170	1, 4, 12, 16 and 18-22	R; H; IR	
171	1-4, 8, 10-17, 20 and 22	IU; R; H; IR; MS; AR; SP; VA; AF; P	
172	1-4 and 10-13	172: 1-4: IU; R; H; IR; MS; AR; SP; VA; AF; P	
173	22		
174	1 [Replace "12" with Def Ex] 11-22	174:11-22: IU; R; H; IR; MS; AR; SP; VA; AF; P	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
175	1-2, 11-18 and 21-22	IU; R; H; IR; MS; AR; SP; VA; AF; P	
176	1 and 3-9	IU; R; H; IR; MS; AR; SP; VA; AF; P	
178	11-18	IU; R; H; IR; MS; AR; SP; VA; AF; P	
182	1-4 and 7-17 [Replace "Exhibit 18" with Def Ex]	IU; R; H; IR; MS; AR; SP; VA; AF; P	
183	5-9, 15-16 and 20-22 [Replace "Exhibit 19" with Def Ex]	IU; R; H; IR; MS; AR; SP; VA; AF; P	
184	1-2	IU; R; H; IR; MS; AR; SP; VA; AF; P	
185	5-6 and 10-11 [Replace "Exhibit 20" with Def Ex] 12 (from "on") 16 and 18-22	IU; R; H; IR; MS; AR; SP; VA; AF; P	
186	1-4	IU; R; H; IR; MS; AR; SP; VA; AF; P	
188	19-20 [Replace "Exhibit 228" with Def Ex]	R	
189	2-4, 9 and 11-16	IU; R; H; IR; MS; AR; SP; VA; AF; P	
191	18-22		
192	1, 8-9, 13 and 15-17	R; P; FSPK; SP; VA ; AR ; AF; H	
193	2-4	R; P; FSPK; SP; VA ; AR ; AF; H	
194	9-10 and 14-15	R; VA; AF; SP	
206	17-22	IU; R; H; IR; MS; AR; SP; VA; AF; P	
207	10-14, 17-18 and 20	IU; R; H; IR; MS; AR; SP; VA; AF; P	
208	1-5 21 (from "I") – 22	IU; R; H; IR; MS; AR; SP; VA; AF; P	
209	1		

**Deposition of Stephen Deuters
February 24, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
195	8-11		195:12-18
235	16-19 and 22	R, SP, F/A, AF, IO, FSPK	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
236	1-2	R, SP, F/A, AF, IO, FSPK	

**Deposition of Laura Divenere
January 15, 2021**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
70	1-21	R	
72	13-17		
74	1-3		74:4-6
78	12-16 and 19	R	
79	3-18	R	
83	16 and 19-22	As to 83:16: IU	
84	2-3, 7-10 and 12-16	As to 84:7-10 and 12-16: IU	
89	18-22	R, UN	
90	1-2, 4-5 and 17-20	R, UN, MS, IU	
91	14-15 and 17	IU, ICD	
92	6	IU, ICD	
93	21-22	R, IU,	94:16-19
94	1 and 6-10	R	94:16-19
98	12-20	R, UN, FSPK	
99	6-7	R, UN, FSPK	100:18-20
102	15-18	C, UN	
103	11-15, 17-19 and 21-22	R, FSPK	
104	1-2	R, FSPK	
106	8-11, 16-17 and 19-21	R, UN, IU, FSPK, H, R	
107	1-5	FSPK, H, R	
124	6-22	R, FSPK, H	125:3-5
142	5-14, 17 and 19-22	H, R, MS, SS, UN	
143	1-15	H, R, MS, SS, UN	
145	11-17		
147	5		147:11-16
150	14-22	H, L, R, AF	
151	1-2, 5, 7-10, 13 and 21	H, L, R, AF	
152	1-9, 12 and 17-21	H, L, R, AF	
153	3-15 and 17-21	R, H, VA, AF, SS	
154	2-9 and 11-21	R, H, VA, AF, SS	
155	3-8, 11, 13-15, 18 and 20-22	R, H, VA, AF, SS, L, C, FSPK	
156	3, 6-7, 9-14, 18-20 and 22	R, H, VA, AF, SS, L, C, FSPK	
157	1, 17-19 and 22	FSPK, H, R, F/A, L,	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
		C	
158	1-2 and 7	L, H, R, AF, F/A	
159	3-7	H, C, L, AF	
165	15-17 and 20-22	L, AF, F/A, R, H, SS	
156	1-3	L, AF, F/A, R, H, SS	

**Deposition of Terence Dougherty
December 2, 2021**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
15	5-22		
16	16-22		17:5-18:5
17	1-4		17:5-18:5
76	20-22	ICD, R	77:21-78:2, 78:13-18
77	1-20	ICD, R	77:21-78:2, 78:13-18
78	3-12 and 19-22	78:3-12: ICD, R 78:19-22: ICD	78:13-18
79	1-22	ICD	
160	1-3, 10 and 12-19	160:12-16: IU	161:12-162:6, 160:11
161	3-11		161:12-162:6
164	6-8, 13 and 17-22	164:17-22: IU	164:14
165	1-4 and 8-13	165:1-2: IU	164:14, 165:14-166:7
175	2-3 and 8-12	FSPK	
186	17-18	H, FSPK	
187	1-7 and 12-19	H, FSPK	
188	8 (from "What") – 10 16-20		
191	5-8 and 12-18	191:5-15: ICD, C, FSPK 191:16-18: ICD, H, FSPK	
192	2-15	ICD, H, FSPK	192:16-194:20
196	16-17 and 21-22	ICD, H, FSPK	
197	1-7 and 14-22	197:1-3: ICD, H, FSPK 197:4-22: ICD, IU	197:8, 198:1-15
204	12-18	H, FSPK	
205	3-10	H, FSPK	
206	6-10 and 16-18	IU	206:11

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
		206:17 (from "I") – 18: UN	
208	4-7 and 13-19	208:4-16: H, PK	
209	2-16	209:5-16: H, PK	209:17-19, 211:9-212:3
226	8 (from "If") – 22	H, FSPK	227:2-228:2
227	1		227:2-228:2
228	4-6, 10-13 and 18-21	228:4-10: H, FSPK 228:19-21: IU	227:2-228:2
242	1-2 [Replace "Exhibit 28" with Def Ex] 10-18	ICD	242:19-22, 243:3-16
244	5-22	ICD, H, FSPK	242:19-22, 243:3-16
245	1-8 and 14-22	ICD, H, FSPK	245:9, 242:19-22, 243:3-16
246	1-4	ICD, H, FSPK	245:9, 242:19-22, 243:3-16
377	6-8, 17-20 and 22	377:6-20: FSPK	380:15-382:1
378	1 and 6-19	378:6-17: UN	380:15-382:1
403	13-19 [Replace "Exhibit 1" with Def Ex]		
404	19-22	ICD, H, FSPK, IO	410:7-13
405	1-2, 5-10 and 19-22	405:1-7: ICD, H, FSPK, IO 405:8-22: ICD, VA, H, FSPK, IO	405:3-4, 410:7-13 405:11-14, 410:7-13
406	1-5, 9-12 and 15-22	ICD, VA, H, FSPK, IO	406:6-8, 406:13-14, 410:7-13
407	1-5, 8-12 and 21-22 [Replace "Exhibit 2" with Def Ex]	407:1-2: ICD, VA, H, FSPK, IO 407:3-12: ICD, H, FSPK, IO	407:6-7, 410:7-13
408	1, 4-6 and 8-22	408: 14-22: ICD, H	410:7-13
409	1-2, 5-15 and 19-22	409:1-10: ICD, H, FSPK, IO 409:11-22: ICD, VA, IO	409:3-4, 410:7-13 409:16-18, 410:7-13
410	1-2, 5-6, 16-18 and 21-22	410:1: ICD, VA, IO 410:2-6: ICD, IO, FSPK, H 410:16-22: ICD, AR, L, H, FSPK, IO	410:3-4, 410:7-13 410:7-13, 410:19-20
411	1-12, 15-18 and 20-21	411:1-9: ICD, AR,	410:7-13, 410:19-20

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
	[Replace "No. 4" with Def Ex]	L, H, FSPK, IO 411:10-18: ICD, L, H, FSPK, IO	411:13-14
412	12-13 and 16-22	ICD	
413	1-10 and 19-21 22 (from "And")	ICD	
414	1-16	ICD	
415	2-19 [Replace "Exhibit No. 15" with Def Ex]	415:2-17: ICD 415:18-19: ICD, L, IU	415:20
416	16-22	416:21-22: ICD, IH, SP, IO	417:2-3
417	1 and 4-5 6 (from "And") – 8 10	417:1-5: ICD, IH, SP, IO 417:6-10: ICD, L	417:2-3 417:9
418	3-12 and 16-19	ICD, FSPK, H, IO	418:13-15
419	1-3, 9-10 and 16-19	ICD, L, H, FSPK, IO	419:4-8, 419:11-15, 419:20-21, 420:2-4
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]	421:1-8: ICD, H, FSPK	
422	2-6, 17-19 and 21-22	422:17-22: ICD, L, R	422:20
423	15-17	ICD, R, IO, ET	
424	1-10 and 12-22	424:1-5: ICD, R, IO, ET 424:6-22: ICD, R, AF, SP	424:11
425	1-5 and 8-22	425:2-10: ICD, L, A, H, FSPK	425:6-7
426	1-4, 7-17 and 20-22	426:2-15: ICD, A, R, IH 426:16-22: ICD, A, L, R, IH	426:5-6 426:18-19
427	1-9, 12-18 and 22	427:13-22: ICD, A, L, R	427:19-20

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
428	1, 9-10 and 16 [Replace "Exhibit 3" with Def Ex]	428:1: ICD, A, L, R 428:9-16 (including "Exhibit 3"): ICD, H	427:19-20
430	2-3 and 7-12	ICD, A, FSPK, H, AF, IU	430:4-6

**Deposition of Joshua Drew
November 19, 2019**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
33	19-20	ICD, IU, FSPK	
42	21-22		42:23-25
49	8-11 and 24-25		
50	1-13	50:5 (from "I") – 7 (to "prior"): H, PK, UN 50:12 (from "But") – 13: H, PK, UN	
65	25 (from "I")	IU, ICD	
86	9-25		87:22-88:11
87	1-6		87:22-88:11

**Deposition of Erin Falati
February 4, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
83	13-18	ICD, H, FSPK	
144	4-6 and 8	ICD, L, R, FSPK	144:7
195	11-14 20 (from "and") – 22	R, FSPK	
196	1	R, FSPK	
203	15-17 and 20-22	FSPK	203:10-14
204	1-2, 4-5 and 8-9	FSPK	203:10-14
250	14-16 and 19-21	FSPK	
328	1-3 and 5-6	FSPK	

**Deposition of Tyler Hadden
March 11, 2021**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
11	10-22		
12	1-22		
14	18-20	AA, R	
18	18-22	R, AA, AR, ICD	
19	1-5 and 13	R, AA, AR, ICD	
29	3 (from "So") – 8 13-22	IU – ambiguous page R, AA, AR, ICD	
21	1-2, 19-20, 22	IO, ET, R, IH, ICD, SP, NC	
22	1-10	IO, ET, R, IH, ICD, SP, NC	
23	2-4, , 6-9, 11-14 and 16-19	IO, ET, R, IH, ICD, SP, NC	
25	9-11	IO, ET, R, IH, ICD, SP, NC	
29	5-7 and 15-22	R, ICD, SP, AA, NC	
30	1-22	R, ICD, SP, AA, NC	
31	1-8, 11-12 and 14-22	R, ICD, SP, AA, IO, IH, NC	
32	1-9	R, ICD, SP, AA, IO, IH, P, NC	
38	5-22	R, ICD, SP, IO, IH, P, NC	
39	1-13 and 16-19	R, ICD, SP, IO, IH, P, NC	
49	7-22	R, ICD, SP	
50	1-4, 6-9 and 11-16	R, ICD, SP, AA	
52	6-8 and 14-18	R, ICD, NC	
54	22 (from "do")	IU, R	
55	1-9 and 13-15	IU, R	
56	12-15	R, SP, ICD	
57	5 (from "Do") – 10 17-22	R, AA; SP, ICD,	
58	1-11	R, SP, IO, VA, FSPK, NC, P	
60	10-16 and 20-22	R	
68	2-6, 18 and 20-22 [Replace "Deposition Exhibit Number 1" with Def Ex]	R, SP, IO, ET, NC, P, AA, ICD, IH	
69	1-14 [Replace "Number 3"]	R, VA	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
	with Def Ex]		
72	21-22	R, VA, FSPK	
73	1-9		
78	18-22	R, NC	
79	1-2 and 17-22	R, NC	
80	1-5 14 (from "And") – 16	R, NC	
81	21 (from "And") – 22	R, NC	
82	1 and 5-22	R, NC	
83	1-10 20 (from "Do") – 22		83:16-19
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	R	
89	21	R, NC, AA, IH	
90	1-5	R, NC	
92	13-22		
93	1-6 and 16-20	AF, VA, R	
94	18-22	AF, R	
95	1-14	R	
96	9-11, 17-20 and 22	R	
97	1-16		
99	2-8	R, ICD	
101	8 (from "The") – 15	R	
102	18 (from "can") – 22	R	
103	1-19	R	
104	10 (from "Typically") – 22	VA, R, SP, IH	
105	1-3, 5 and 7-22	VA, R, SP, IH	
106	1-9	VA, R, SP, IH	
109	3-7	R, SP	
112	15 (from "Then") – 22	H, R	
113	1-15	R, H, AF, SP, AR	
115	22	R, IO, ET, SP, FSPK, H	
116	1-18 and 21-22	R, IO, ET, SP, FSPK, H	
117	11 (from "and") – 22	H, R, AR, AF, SP, IO	
118	1-22	H, R, AR, AF, SP, IO	
119	1-6	H, R, AR, AF, SP, IO	
124	11-18	R, AF	
125	12-22	AR, C, SP, AF	
126	7 and 9-14	H, SP, VA, R	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
	18 (from "Do") – 22		
127	1-3, 10-16 and 22 [Replace "Deposition Exhibit Number 6" with Def Ex]	AA, H, AF, R, IO, F/A, FSPK	
128	1-3, 11-14 and 19-22 [Replace "Deposition Exhibit Number 17" with Def Ex]	ET, H, AF, R, IO, F/A, FSPK	
129	1-4 and 7 9 (from "And") – 12 15-16 and 18-22	ET, H, AF, R, IO, F/A, FSPK, MS, SP	
130	1-3, 8-9, 11-12, 16-19 and 21-22	ET, H, AF, R, IO, F/A, FSPK, MS, SP	
131	19-21	ET, H, AF, R, IO, F/A, FSPK, MS, SP	
132	3, 5-8, 10-11, 16-17 and 22 [Replace "Deposition Exhibit Number 18" with Def Ex]	ET, H, AF, R, IO, F/A, FSPK, MS, SP	
133	1-4	H, AF, R, IO, F/A, FSPK, MS, SP, VA	
134	5, 8-9 and 11-19	H, AF, R, IO, F/A, FSPK, MS, SP, VA	
135	2-22 [Replace "Deposition Exhibit Number 19" with Def Ex]	H, SP	
136	1, 7-18 and 20-21 [Replace "Deposition Exhibit Number 20" with Def Ex]	H, AF, R, IO, F/A, FSPK, MS, SP, VA	
137	1-8 and 20-22	H, AF, R, IO, F/A, FSPK, MS, SP, VA	
138	1-18	H, AF, R, IO, F/A, FSPK, MS, SP, VA, IH	
139	4-7		
141	11-22	AA, IO	
142	1-6, 13-15 and 21-22 [Replace "Deposition Exhibit Number 23" with Def Ex]	R, AA, C	
143	3-17 and 21-22	H, SP	
144	5-8 and 13-16	AR, AF, FSPK, R	
145	13 (from "I'm") – 19, and 22	H, F/A, AF, R, IO, SP, FSPK	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
	[Replace "Deposition Exhibit Number 24" with Def Ex]		
146	2-5 and 17-21 [Replace "Hadden Exhibit Number 24" with Def Ex]	H, F/A, AF, R, IO, SP, FSPK	
147	2 and 9-18	H, F/A, AF, R, IO, SP, FSPK, AR	
148	5-6 [Replace "Exhibit Number 24" with Def Ex] 8-10, 14-15 and 17-20	H, F/A, AF, R, IO, SP, FSPK, ET,	
149	3-5, 7-14 and 18-21	H, F/A, AF, R, IO, SP, FSPK, ET, AA MS	
150	7-11	H, F/A, AF, R, IO, SP, FSPK, ET, IH	
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]	H, F/A, AF, R, IO, SP, FSPK, ET, NC	
156	1, 3-4, 10 and 16-20 [Replace "Deposition Exhibit Number 26" with Def Ex]	H, F/A, AF, R, IO, SP, FSPK, ET, NC	
157	1, 3-4, 8, 14-16, 20 and 22 [Replace "Exhibit Number 27" with Def Ex]	H, F/A, AF, R, IO, SP, FSPK, ET, NC	
158	1, 5, 11-15, 19 and 21-22 [Replace "Hadden Exhibit Number 27" with Def Ex]	H, F/A, AF, R, IO, SP, FSPK, ET, NC	
159	4, 8-9, 13, 15-16 and 19 [Replace "Exhibit Number 29" with Def Ex]	H, F/A, AF, R, IO, SP, FSPK, ET, NC	
160	2-16 and 19-20 [Replace "Exhibit Number 30" with Def Ex]	H, F/A, AF, R, IO, SP, FSPK	
161	12 (from "I'm") – 17 and 21-22 [Replace "Deposition Exhibit Number 31" with Def Ex]	H, F/A, AF, R, SP, FSPK	
162	1, 6-10, 13, 15-16 and 20-22	H, F/A, AF, R, SP,	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
	[Replace "Exhibit Number 32" with Def Ex]	FSPK, IO	
163	1, 6-9 and 12 [Replace "Exhibit 33" with Def Ex] 17-19 and 22 [Replace "34" with Def Ex]	H, F/A, AF, R, SP, FSPK, IO	
164	1-2, 4-6, 9 and 14-18 [Replace "Exhibit Number 35" with Def Ex]	H, F/A, AF, R, SP, FSPK	
165	3, 7-11, 14 and 16-18 [Replace "Deposition Exhibit Number 36" with Def Ex]	H, F/A, AF, R, SP, FSPK, IO	
166	2, 7-11, 14 and 16-17 [Replace "Exhibit Number 37" with Def Ex]	H, F/A, AF, R, SP, FSPK, IO	
167	1-2, 4-5, 10-13, 16, 18-19 and 22 [Replace "38" with Def Ex]	H, F/A, AF, R, SP, FSPK, IO	
168	1, 6-10, 13 and 15-17 [Replace "Exhibit Number 39" with Def Ex]	H, F/A, AF, R, SP, FSPK	
169	6-15 and 20-22 [Replace "Deposition Exhibit Number 40" with Def Ex]	H, F/A, AF, R, SP, FSPK	
170	1, 5-7, 12-16 and 19 [Replace "Exhibit Number 41" with Def Ex]	H, F/A, AF, R, SP, FSPK	
171	2-6 and 9 [Replace "Exhibit Number 42" with Def Ex] 13-17 and 20 [Replace "Deposition Exhibit Number 43" with Def Ex]	H, F/A, AF, R, SP, FSPK	
172	2-6, 9 and 14-18 ["Deposition Exhibit Number 44" with Def Ex]	H, F/A, AF, R, SP, FSPK, AR, IO, ET	
173	20-21	AF, R, SP, FSPK, IO, ET	
174	1-2 and 5-12	AF, R, SP, FSPK, IO, ET	
175	5-17, 20 and 22	AF, R, SP, FSPK, VA, IO, ET	
176	1-2, 7-10 and 12-16	AF, R, SP, FSPK, IH, VA, IO	
177	1-4	AF, R, SP, FSPK, IH,	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
		VA, IO	
179	3-22	AF, R, SP, FSPK, IH, VA, IO, MS, P	
180	4, 6-13, 18 and 20-22	AF, R, SP, FSPK, IH, VA, IO, MS, P	
181	2-7 and 14	AF, R, FSPK, IH, VA, IO, MS, P, NC	
183	8-13	AF, R, FSPK, IH, VA, IO, MS, P, NC	
215	2-7, 12-14 and 16-19	AF, R, IH, VA, IO, MS	
216	7-8 and 10-12	AF, R, IH, VA, IO, MS	
219	6 (from "Do") – 9 16 and 18-22	AF, H, F/A, IH, SP, R, VA, IO, AR	
220	1-22		
221	1-2, 7-8 and 10-15	SP, FSPK, AF, VA,	
222	11-13	SP, FSPK, AF, VA	
223	2-7, 12 and 18-20	SP, FSPK, AF, R, NC	
224	2-8, 10-13, 17-19 and 21-22	SP, FSPK, AF, VA, AF, R	
225	1-11, 17-18 and 20-22	SP, FSPK, VA, AF, R, IH, ET, IO	
226	1-9 and 15-22 [Replace "Hadden Exhibit Number 8" with Def Ex]	SP, FSPK, VA, AF, R, IH, ET, IO	
227	1-6, 9 and 14-18 [Replace "Exhibit Number 9" with Def Ex]	R, IH	
228	1, 3-6 and 20-22	R	
229	1-22	R, SP, AF, VA, MS, IO	
230	1-16	R, SP, AF, VA, MS, IO	
231	10-11 and 13-22	R, SP, AF, VA, MS, IO	
232	5-6, 8-10, 13 and 15-22	R, SP, AF, VA, MS, IO	
233	1-22	R, SP, AF, VA, MS, IO	
234	1-2, 4-13, 16-18 and 20-22	R, SP, AF, VA, MS, IO, IH, ET	
235	1 12 (from "Have") – 15 18-19 and 21-22	R, MS, IO, ET, VA, IH	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
236	1-3	R, MS, IO, ET, VA, IH	
238	6-22 [Replace "Deposition Exhibit Number 10" with Def Ex]	R, IO	
239	1-9, 17-19 and 21-22	R, AF, MS, IH, VA, NC	
240	1-22	R, AF, MS, IH, VA, NC	
241	1-11, 13-14 and 18-22 [Replace "Exhibit Number 11" with Def Ex]	R, AF, MS, IH, VA,	
242	1-16 and 22	R, AF, AR MS	
243	1-2, 4, 7-8, 10-12, 17-18 and 20-22	R, AF, AR	
244	1-4 and 21-22	R, AF, AR, MS	
245	1-5 and 11-13		
246	5-8 and 19-21	IH, R, VA, SP	
247	2-5 8 (from "What") – 12 15-18 and 20-22	IH, R, VA, SP	
248	1-2 and 9-22 [Replace "Exhibit Number 49" with Def Ex]	R, AR	
249	1, 6 and 8-18	R, AR, AF, IO	

**Deposition of Whitney Henriquez
February 3, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
85	13 (from "In any") – 15 17-18 and 22	R, ICE, ICD	
86	1-6	R, ICE, ICD, AA	
173	9-14		
178	1, 5-9 and 13-16	R, S, PK,	
180	9-11 and 15-22	ICD, SP	186:7-13
181	1-3 and 7-19	ICD, SP	
182	1-6 and 15-22	ICD, SP	
183	1, 7-10, 14-16 and 20-22	ICD, SP	
184	1-6	ICD	
185	19-21		
186	3-6 and 20-22	ICD, UN	
187	4-14	ICD, SP	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
188	5-14	ICD	187:14-188:4
190	9-14 and 18-22	ICD	
191	1-5 and 11-20	ICD	
192	2-12 and 16-22	ICD	
193	1-2, 6-8, 12-16 and 20-22	ICD	
194	1-8, 13-18 and 22	ICD	
195	1-6 and 10-22	ICD, UN	
196	1-2, 6-12 and 16-22	ICD, UN, IO, ET	
197	1-2	ICD, UN, IO, ET	
198	12 (from "would") – 14 18-21	ICD, UN	
199	1-5 and 9-10	ICD, UN, IO, ET	
200	13-15 and 22		
203	21-22		
204	3-14, 17-18 and 22	UN, SP, VA, H, FSPK	
205	1	R, ICD	
206	4-6 and 12-21	ICD, UN, FSPK	
207	3-9 and 13-18	ICD, FSPK, SP	
208	18 (from "If") – 22	ICD, SP	
209	1-5, 9-16 and 22	ICD, SP, H	
210	1-6, 10-17 and 21-22	ICD, FSPK, SP	
211	1-3 and 7-14	ICD, FSPK, SP	211:15-212:4
212	20-22	ICD	213:1-214:5
214	18-20	ICD	213:1-214:5
215	2-7, 11-14 and 18-20	ICD	213:1-214:5
216	2-5, 9-13, 17-20 and 22	ICD	
217	1-3, 7-13 and 17-22	ICD	
218	1-5	ICD	
219	1-4, 8-14 and 19	ICD	
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	UN	
225	1-11 and 15-22	UN	
226	1-3 and 7-13		
228	18-21		
229	3-16 and 20-22	229:4-16: UN	
230	1-19	UN	
231	1-5 and 9-17	231:10-17 (after "Amber"): UN, R, ICE	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
232	4-7	UN, R, ICE, ICD	232:8-13 233:4-13
241	11-20	P, R	
242	2 and 20-22		
243	1-2 and 6-15	243:8-15: UN, R, FSPK	
244	1-3 and 7-18	UN, IO, AR, PK, SP, P	
245	2-22	UN, IO, AR, PK, SP, P	
246	1-7 and 11-17	UN, IO, AR, PK, SP, P	
249	20-21		
250	3-7		

**Deposition of Jennifer Howell, Volume 1
February 26, 2021**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
188	17 (from "Let's") [Replace "Exhibit Number 43" with Def Ex] 20-22	IU, ICD	

**Deposition of Jennifer Howell, Volume 2
March 3, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
285	19-21	R, ICD	285:7-18
286	1-3	R, SP, ICD	285:7-18
314	1-6	R, MIL, ICD	314:7-11 (through "Yes"), 317:2-5
337	11-16 and 22	R, ICD	
338	1-22	R, ICD	
339	1-3 and 18-22	R, ICD 339:18-22 MIL, R, AA	
340	1-16	MIS, R, AA, MIL, ICD	312:18-313:1, 341:2-3
341	4-9	AA, R, MIL, ICD	312:18-313:1
345	12-22	MIS, ICD	297:5-9, 297:22-298:8, 46:1-2
346	3-14	AA, ICD	
347	20 (from "And") – 21	IU, ICD	
348	2-8 and 10-22	R, ICD	
349	1-4, 7 and 13-18	SP, R, IO, ICD	349:5-6, 349:19-350:1

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
350	10-11, 13-18 and 22	ICD	350:12
351	1-7 and 17	ICD	351:8-10
352	16-18 and 21-22	SP, IH, IO, AA, ICD	
353	1 and 5-7	SP, IO, AA, ICD	353:2-4
355	10-12 and 15-22	MIS, ICD 355:20-22 C, VA, IO	355:13-14
356	1-2, 7-12 and 22	IH, SP, VA, ICD	356:3-6, 356:13-17
357	1-15 and 22	IH, SP, MIS, C, ICD	357:19 (from "incomplete") - 21
358	1-9, 16, 19-20 and 22	IO, IH, MIS, SP, ICD	358:10-13, 358:17-18, 359:4-5
359	6-10 and 19-22	359:9-10 SP	354:6-10, 360:1-5
360	17-21	SP, VA, IH	
361	2 (from "In") - 5, and 7	AA	361:6

**Deposition of Tracey Jacobs
January 28, 2021**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
117	13-16	MIL, R, SP, AA, ICD	117:17-18
144	21-22	R, H, IU, ICD	
145	1-3 and 9-11	IU, R, H, ICD	
146	18-22	R, H, ICD	
147	1-3	R, H, MIL, ICD	
148	16-20	R, H, MIL, ICD	
189	7-19	R, ICD	189:20-190:12
190	13-20	R, ICD	189:20-190:12
191	7	ICD	
196	16-22	C, VA, ICD	
197	1-2	R, AA, ICD	
201	18-22	R, MIL, SP, ICD	202:1-2
202	5	R, SP, ICD	
203	12-13 and 18-19	R, MIL, AA, ICD	203:14-15
207	12-14 and 22	R, MIL, AA, MIS, SP, ICD	207:15-19 (through "affected")
208	1	SP, IO, ICD	
214	6-9	ICD	

**Deposition of Katherine O. James
February 18, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
14	4-21	14:4-19: ICD, R, H	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
		14:20-22: ICD, A, R, H	14:22
15	2-16	15:2-4: ICD, A, R, H 15:5-16: ICD, R, H	14:22, 15:17-16:7
17	3-4, 6-7, 9-13 and 16	17:3-7: ICD, C, R, H 17:9-11: ICD, R, H 17:12-16: ICD, A, AA, R, H	16:17, 17:5 17:14-15, 17:18-20, 18:18-19:11
21	9-11	ICD	21:12-19, 22:6-12
23	13-22	ICD	
24	1-2	ICD	
25	5-9	ICD, R	
27	13-14		27:15-5
29	1-22	29:1: IU	
30	1-4 and 11-13	30:1-4: AA	30:5-6
33	7-9, 12-13 and 19 [Replace "Exhibit 1" with Def Ex]	ICD, IR	
34	1-10 and 17-22	34:19-22: ICD, H, FSPK, IR	
35	1, 10-15, 18 and 20-22	35:1: ICD, H, FSPK 35:13-18: ICD, FSPK, H, AF 35:20-22: ICD, VA, AF, R	35:16-17 36:1-3
36	5-10	ICD, VA, AF, R	36:1-3
37	2-9 and 11-21	37:2-12: ICD, UN, IU, R, H 37:13-22: ICD, C, VA, H, FSPK	37:22-38:1
38	2 and 16-20	38:2: ICD, C, VA, H, FSPK 38:16-20: ICD, IR	
39	9-16, 20 and 22	39:9-14: ICD, H, AF, FSPK, IR 39:15-20: ICD, R, H, FSPK	39:17-19

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
		39:22: ICD, R, H, FSPK	40:3-5
40	1-2 and 6	40:1-6: ICD, R, H, FSPK	40:3-5
41	8-10 and 16-19	ICD, VA, FSPK, NC	41:11-13
42	4-5 and 8 (through "2") [Replace "Exhibit 2" with Def Ex]	ICD, IR	
43	13-22	43:13-19: ICD 43:20-22: ICD, H, IR	
44	1-11	ICD, H, FSPK, IR	
45	12-17 and 22	45:12-17: ICD, A, MS, H 45:22: ICD, MS, FSPK, IO	45:18-20 46:3-4
46	1-2, 5-8, 10-12, 18-19 and 21-22	46:1-8: ICD, MS, FSPK, IO 46:10-19: ICD, AA, MS, R, NC, FSPK, IO 46:21-22: ICD, AA, MS, R, NC, FSPK, IO	46:3-4 46:13-16 46:13-16, 47:3
47	1-2, 5-8, 10-17 and 20-22	47:1-8: ICD, AA, MS, R, NC, FSPK, IO 47:10-15: ICD, R, NC 47:16-22: ICD, AF, R, FSPK, IO	46:13-16, 47:3 47:18-19
48	1, 3-5, 8 and 13-16	48:1: ICD, AF, R, FSPK, IO 48:3-8: ICD, VA, FSPK, R, IO	47:18-19 48:6-7
49	15-16, 18 and 22 [Replace "Exhibit 3" with Def Ex]	ICD	
50	1-17 and 22	50:9-13: ICD, H, FSPK 50:14-17: ICD, VA, FSPK, IO	 50:18-20

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
		50:22: ICD, H	
51	1-3, 10-13 and 16	51:1-3: ICD, H 51:10-16: ICD, VA, AF, H, FSPK	51:14-15
58	14-17, 19 and 20-22 [Replace "Exhibit 4" with Def Ex]	ICD, IR	
59	1-11, 16 and 18-21	59:1-9: ICD, IR 59:10-16: ICD, VA, FSPK, H, IR 59:18-21: ICD, H, FSPK, IR	59:12-15 59:22-60:1
60	3-6, 8-14, 18 and 20-21	60:3-6: ICD, H, FSPK, IR 60:8-21: ICD, H, FSPK, IR	59:22-60:1 60:15-17, 60:22-61:2
61	3-6 and 20-22	61:3: ICD, H, FSPK 61:4-6: ICD 61:20-22: ICD, R	60:15-17, 60:22-61:2
62	1, 7-12 and 14-22	ICD, R	
63	1-5, 9 and 11-17	63:1-2: ICD, R 63:3-9: ICD, R, VA, FSPK, H 63:11-17: ICD	63:6-8
64	1-4, 8-9, 11-14 and 20-22	64:1-9: ICD, P, H, FSPK, IO 64:11-22: ICD, H, FSPK, IO	64:5-7 64:15-18
65	1-5, 7-16, 20 and 22	65:1-2: ICD, H, FSPK, IO 65:3-14: ICD, H, FSPK, IO 65:15-20: ICD, VA, H, FSPK, IO	64:15-18 65:17-19

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
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67	1-22	67:1-3: ICD, H, FSPK 67:4-16: ICD 67:16-22: ICD, H, FSPK	
68	1-11	68:1-11: ICD, H, FSPK	68:12-13
69	6-22	69:22: ICD, R	
70	1-4 and 9-18	ICD, R	
71	14-22	ICD, R	
72	1-3	ICD, R	
82	3-4 [Referring to Exhibit 8; Replace with Def Ex] 18-22	ICD, R, IR	
83	1 and 10-22	ICD, R, IR	
84	1-2, 7-12, 14-15 and 19-22	84:1-15: ICD, R, VA 84:19-22: ICD, R, IR	84:16-17
85	1	ICD, R	
86	7-22	ICD, H, FSPK, R, IR	
87	1-7, 9-11 and 13-22	87:1-4: ICD, H, FSPK, R 87:5-11: ICD, A, H, FSPK, R 87:13-22: ICD, H, FSPK	87:8
88	1, 4, 6-11, 14-15, 17-19 and 22	88:1-9: ICD, H, FSPK	88:2-3

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
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		88:17-22: ICD, VA, UN, IH, FSPK, R	88:20-21
89	1	ICD, VA, UN, IH, FSPK, R	88:20-21
90	5-9 and 11-22	ICD, H, FSPK, IR	
91	1-9, 13-15 and 17-21	91:1-15: ICD, H, FSPK, IR	91:10-12
		91:17-21: ICD, A, IR, R	91:22-92:1
92	2-3, 5-6, 9-10, 12-18 and 22	92:2-3: ICD, A, IR, R	91:22-92:1
		92:5-10: ICD, A, AA, IR, R	92:7-8
		92:12-22: ICD, A, AA, MT, R, UN	92:19-21
93	1-4	ICD, A, AA, MT, R, UN	92:19-21
104	21-22	ICD, AF, R, FSPK	
105	1 and 12-22	105:1: ICD, AF, R, FSPK	
		105:12-13: AF	
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106	1-7, 9-16 and 18-22	106:1-3: H, AF	
		106:4-16: H, UN	
		106:18-22: ICD, AF, R	
107	2-3 and 13	ICD	
108	19-22	ICD, H, IR	
109	1-17, 20 and 22	109:1-11: ICD, H, IR	
		109:12-15: ICD, H, IR, AF, FSPK	
		109:16-20: ICD, AA, AF, FSPK	109:18-19

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
		109:22: ICD, H, R	
110	1-22	110:1-8: ICD, H, R 110:9-21: ICD, R 110:22: ICD, R, AF	
111	1-6, 10-16 and 20-22	111:1-6: ICD, R, AF, UN 111:10-13: ICD, NC, UN 111:14-22: ICD, A, F/A, AF, R 111:20-22: ICD, H, AF, R	111:17-18
112	1-22	112:1-3: ICD, H, AF, R 112:4-22: ICD, H, AF, R, FSPK	
113	1-12, 17 and 19-22	112:1-2: ICD, UN, AF, R, FSPK 112:3-6: ICD, R 112:7-9: ICD, AF, FSPK, R 112:10-17: ICD, VA, AF, FSPK, R 112:19-22; ICD, AF, FSPK, R	112:13-15
114	1-8 and 11-13	114:1-4: ICD, H, R 114:5-6: ICD, R 114:7-13: ICD, A, AF, FSPK, R	114:9-10, 114:15-116:6
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149	10-12 and 14	ICD, VA, R, FSPK	149:13
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164	1-2 and 5		
165	21-22	ICD, H, FSPK, AF	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
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167	1-3 and 5-14 [Referring to Exhibit 12; Replace with Def Ex]	167:13-14: ICD, IR	
168	9-22	168:9-17: ICD 168:18-21: ICD, H, FSPK, IR 168:22: ICD, H, FSPK, IO, IR	169:2-4
169	1, 5-6, 8-9, 13-14 and 16-18	ICD, H, FSPK, IO, IR	169:2-4, 169:10-12
170	2-3, 5, 13-15, 18-19, 21-22	170:2-5: ICD, H, FSPK, IO, IR 170:13-22: ICD, AF, FSPK, IO, R	169:10-12 170:16-17
171	1-4	171:1-2: ICD, AF, FSPK, IO, R 171:3-4: ICD, R	

**Deposition of David Kipper, M.D.
February 22, 2021**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
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36	6 (from "when") – 9	ICD	
46	10-13		
53	17-22	ICD, FSPK	
54	1-5	ICD, FSPK	
67	13-14 and 21-22	ICD, IU	
68	1-9	ICD, FSPK	
107	20-22	H, PK	
120	22		
121	1-6 and 9	121:3-9: AA, FSPK	
185	8-15	FSPK	185:5-7

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
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201	9-16	ICD	
237	17-22	ICD, H, FSPK	235:20-21, 237:5-16
238	1-11	ICD, H, FSPK	235:20-21, 237:5-16
239	3-11 and 13-18	ICD, H	235:20-21, 239:19-240:3
259	14-17	ICD, R	
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**Deposition of Debra Lloyd, APRN
January 20, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
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92	4-19	ICD, H, FSPK	
113	22	ICD, H, FSPK, AF	114:4-8
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132	22	ICD, R	
133	1-2	ICD, R	
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**Deposition of Brandon Patterson
March 2, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
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182	16-18 and 20-21	H, ICD	
183	3-5, 8-9, 15-16 and 21-22	NC, ICD	
184	1-2	NC, ICD	
190	19-21	R, ICD	192:3-8, 13
191	2, 4-5 and 8	NC, ICD	192:3-8, 13
199	4-6 and 11-14	NC, ICD	
223	14-17	MS, ICD, MIL	223:18-19
226	12-13	SP, VA, NC, ICD	226:14-16
227	1, 3-4, 7, 10, 12-20 and 22	SP, AA, IO, ICD	227:5, 8-9, 21
228	2-4, 7-8, 10-11, 14, 16-17 and 19 (through "recall")	VA as to "time", ICD	228:5-6, 12-13, 18

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
229	1-2 and 5	VA, ICD, AA	229:3-4

**Deposition of Raquel Rose Pennington, Volume 1
January 20, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
38	5-8 and 10-12		33:18-19, 33:25-34:2
49	16-22	ICD	49:13-18
58	21-24		
60	2-3, 6 and 8-11	ICD	
62	15-16 and 20-22	VA, FSPK	62:17-19
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**Deposition of Alejandro Romero
January 22, 2021**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
9	10 (from "Have") – 22	9:16-22: MS, R, FSPK	9:4-8
10	1-3	10:1-2: MS, R, FSPK	9:4-8
14	1 (from "was") – 22	FSPK, H, R, ICD	
15	1-22	15:1-9: ICD 15:10-22: FSPK, R, ICD	
16	1-22	16:1-12: FSPK, R, ICD 16:13-22: R, ICD	
17	1-2 9 (from "Did") – 14 17-22	17:1-2: R, ICD 17:9-13: ICD 17:13-14: AA, ICD 17:20-22: AA, ICD	
18	3-9 and 20-22	ICD	
19	1-2	ICD	
20	11-22	20:11-19: FSPK, R 20:20-22:VA	
21	6-22	R	21:3-5
22	1-10 and 20-22	R, ICD	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
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34	4-6	R, FSPK, ICD	
35	5-7 and 10-22	35:5-15: VA, FSPK, R, ICD 35:16-22: R, ICD	
36	1-8 and 15-22	R, ICD	
37	1-4 and 7-14	37:1-4: R, ICD	
38	10 (from "I'm") – 14 19-22	38:10-14: ICD, IR	
39	1-4	R, MS, IR, ICD	
41	15-22	R, ICD	
42	1-22	R, ICD	
43	1-13 and 16	43:1-6: R, ICD 43:7-16: VA, C, R, ICD	
44	13-16 and 19-22	FSPK, AF, ICD	
45	1-22	45:1: FSPK, AF, ICD 45:2-13: ICD 45:14-22: H, ICD	
46	1-18	46:1-4, 14-18: ICD 46: 5-13: H, IO, ICD	
47	18 (from "And") – 22	R, ICD	
48	1-14	48:1-9: R, ICD 48:10-14: MS, ICD	
49	7-22	H, FSPK, ICD	
50	1-12 21 (from "Did") – 22	FSPK, ICD	
51	1-2, 5-8 and 14-17 (through "building")	FSPK, ICD	
52	4 (from "But") - 13 15-22	FSPK, ICD	
53	1-13	FSPK, ICD	
56	15-20	ICD	
58	18-22	H, FSPK, ICD	
59	1-12 and 16-22	R, FSPK, IO, ICD	
60	1-2, 7-14 (through "5") [Replace "Exhibit 5" with Def Ex] 18-22	60:1-2: R, FSPK, IO, ICD 60:7-14: F/A, ICD	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
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61	1, 4 and 15-20	61:1, 4: FSPK, ICD 61: 15-20: MS, C, FSPK, F/A, IU, ICD	
62	15-17 and 20-22	FSPK, F/A, ICD	
63	1-4	FSPK, F/A, ICD	
64	17-21 [Replace "Romero 7" with Def Ex]	F/A, AF, ICD	
65	3-19	65: 3-5: AF, F/A, ICD 65:6-19: FSPK, F/A, ICD	
67	20-22	65:20-22: MS, FSPK	67:4-19
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71	1-3	71:1-3: AA	71:9-73:9
73	10-12, 15-17 and 20-22	73:10-20:AA 73:21-22: FSPK, IO	
74	1-2, 5, 7-9 and 20-22	74: 1-9: FSPK, IO 74:20-22: AF, IH, FSPK	
75	4-7, 11-14 and 17-22	75:1-7: AF, IH, FSPK 75:11-22: AA, FSPK, H, R	75: 8-10
76	1-22	AA, FSPK, H	
77	9 (from "The") – 16 17 (from "I'm") – 22 [Replace "Romero Exhibit 1" with Def Ex]	77:9-16: MS	
78	1-8 and 22		
79	1-22		
80	17-22	80: 17-19: IO, FSPK 80:20-22: FSPK, AF, H	80:1-16

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
81	1 and 6	FSPK, AF, H	
82	4-7, 10 and 12-17	82: 4-11: MS, AF, FSPK	
86	18 (from "And") – 22	FSPK, IO	
87	1-4	FSPK, IO	
163	21-22		
164	1-11 and 13-22 [Replace "Exhibit 1" with Def Ex]	164: 7-10: R 164:13-22: IR	
165	1-22	165:18-22: R, ICD, IR	
166	1-22	166:1-8: IR, R 166:9-22: R	
167	1-14 and 18-22	167: 1-12: R, ICD 167:13-22: IO, AF, VA, FSPK	
168	1-3	IO, AF, VA, FSPK	
169	14-22	R, ICD, L, AF	
170	1-4	R, ICD, L, AF	
172	10-11, 14 and 17-22	R	
173	1-10		

**Deposition of Anthony Romero
December 15, 2021**

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19	20-22		
20	1-2 and 14-17		
25	4-6 and 9-11	IU	25:12
30	14-15, 18-20 and 22	30:14-20: AA, A, NC	30:16-17
31	1-2, 4-5, 7-13 and 15-17	31:15-17: AA, NC	31:18-19
35	1-5, 7-9 and 12-22	35:5-9: VA, UN, R	35:11
36	1-3		
55	6, 10-11, 13-15 and 18-22	55:13-22: FSPK, IO	54:15-55:2
56	1-2	FSPK	
57	4-6 and 8-19	FSPK	
110	11 (from "I") – 15 17-21	ICD, IU, H, FSPK	110:22-111:2
120	8-19	ICD, R, FSPK, IO	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
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145	1-2, 7-8 and 10-22	ICD, IR, H, FSPK, IO	
146	1-18	146:1-11: ICD, IR, H, FSPK, IO	
156	8-9, 11-13 and 15-17		
157	3-6		
163	7-8 and 12-22	ICD, UN, R, FSPK	164:16-17
164	1-3 and 6-15	ICD, UN, R, FSPK	164:16-17
165	3-4, 7-11 and 14-15	ICD, UN, R, FSPK	
167	6-12 and 15-18	167:11-18: ICD, UN, R, FSPK	169:15 (at "Let's") -170:12
187	14-16 (through "16") [Replace "Exhibit 16" with Def Ex]	ICD, IR	
194	13-18	ICD, IR, R, NC	
195	10-16 and 19	ICD, IR, H, R, NC	
196	1-2 and 4-8	ICD, H, R, NC, FSPK	
223	2-5, 9-10 and 13-17	A, R, NC	
224	9 (from "We've") -22		
225	1-5		225:6-11
226	9-11 and 15-19		
281	19-20 [Replace "Exhibit 30" with Def Ex]	ICD, IR	
282	7 (from "Let's") - 18 21-22	ICD, IR, H, R FSPK	
283	1-7	ICD, IR, H, R FSPK	283:8-22
308	11-14, 20 and 22	308:22: ICD, R, A	
309	3	ICD, R, A	
313	2-4, 8-12, 14-16 and 20-21	313:2-15: ICD, R, H, FSPK, IO	
314	1-2 and 4-5		
320	22	ICD, L, R	321:3
321	1-2, 13-15, 17-19 and 20-22	321:1-15: ICD, L, R 321:17-22: ICD, VA, R	321:3
322	1-3 5 (from "And") - 7 9, 10-14, 16-19 and 21-22	322:1-3: ICD, VA, R 322:5-12: ICD, L, R 322:13-19: ICD, L, R, IH, SP, R 322:21-22: ICD, L, H, FSPK	322:8 322:15

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
323	1-3, 5-6, 8-9, 12-17 and 19-22	323:1-6: ICD, L, H, FSPK 323:8-17: ICD, H, FSPK, IO 323:19-22: ICD, H, AF	323:4 323:10-11
325	19-21 (through "Romero") [Referring to Exhibit 2; Replace with Def Ex]	ICD, IR	324:19-20
326	4 (from "Yes") – 5 8-22	ICD, IR, H, FSPK, IO	326:7
327	1-10, 13-16 and 19-20	327:1-7: ICD, IR, H, FSPK, IO 327:8-20: ICD, AA	
330	20-21 (through "please") [Replace "Exhibit 4" with Def Ex]	ICD, IR	
331	12-14 and 17-22	ICD, IR, L, H, UN, NC	
332	1-6 and 12-14 (through "Heard")	332:102: ICD, IR, L, H, UN, NC 332:3-14: ICD, L, NC	332:7
338	12 (from "By") – 14 16-19 and 21-22	ICD, L, NC	338:15, 338:20
339	1-5 and 7-8 [Replace "Exhibit 7" with Def Ex]	339:1-5: ICD, L, NC 339:7-8: ICD, IR	338:20
340	22	ICD, IR, IU, H, FSPK, IO	
341	1-9	ICD, IR, IU, H, FSPK, IO	
342	14-15 and 20-21 [Replace "Exhibit 8" with Def Ex]	ICD, IR	
343	1	ICD, IR	
344	5-13 and 16-21	344:5-10: ICD, IR, NC 344:11-21: ICD, L, AA, NC	344:14-15
345	1 (from "And") – 5 12 (from "And") – 22	345:1-5: ICD, NC	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
		345:12-21: ICD, IR, FSPK, NC	345:6
		345:22: ICD, L, AA, NC	346:2-3
346	1, 4-8 and 15-22	346:1-8: ICD, L, AA, NC	346:2-3
		346:15-22: ICD, IR, H, FSPK	346:9-10
347	1-3 4 (from "And") – 6 14-20	347:1-3: ICD, IR, H, FSPK	
		347:4-20: ICD, L, VA, H, FSPK	347:7-9, 347:12-13
348	2 (from "Let's") [Replace "Exhibit 14" with Def Ex] 7 (from "Are") – 8	ICD, IR	
349	3-22	ICD, IR, H, FSPK, IO	350:4-6
350	1-3	ICD, IR, H, FSPK, IO, UN	350:4-6
351	19 (from "So") – 22	ICD, L, A, VA, IR, R, IH, SP, IO	352:1-2
352	3-9	ICD, L, A, VA, IR, R, IH, SP, IO	
357	21-22	ICD, R	
360	17-22	ICD, H, FSPK, R	
361	1-2, 4 and 7-8	ICD, L, H, FSPK, R	361:5-6
364	11-15, 20 and 22	364:11-20: ICD, IR, L, H, FSPK, R	364:19
		364:22: ICD, IR, L, H, FSPK, R	365:8
365	1-7, 9-11 and 14-15	ICD, IR, L, H, FSPK, R	365:8, 365:12-13
367	22 (from "Do")	ICD, L, FSPK, IO, NC, R	368:3 (through "leading")
368	1-2, 10-17 and 20	368:1-12: ICD, L, FSPK, IO, NC, R	368:3 (through "leading")
		368:13-15: ICD, NC, R	
		368:16-20: ICD, FSPK, IO, NC, R	368:18-19

**Deposition of Officer Melissa Saenz
March 31, 2021**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
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11	10-16 and 22		
12	1-22	ICD	
13	1 and 21-22	ICD	
14	1-2 and 20-22	ICD	
15	1 and 18-22		
16	1-7 and 20-22		16:13-19
17	1		
18	19-22	ICD	
19	1-11, 16-17 and 19-22	19:1-10: ICD 19:11-17: VA, ICD 19:19-22: IU, ICD	
21	11-19	ICD	
27	17-22	R, FSPK, ICD	
28	1-19	28: 1-17: R, FSPK, ICD 28:18-22: VA, FSPK, R, ICD	
29	1, 3-17 and 20-22	29: 1-15: FSPK, R, ICD 29:16-22: VA, FSPK, R, ICD	
30	2-3, 6, 9-12, 15-16 and 18-22	R, VA, FSPK, ICD	
31	1-4 and 11-16	31:1-4: R, ICD 31:11-16: R, FSPK, ICD	
32	4-13 and 19	32: 4-6: IU, R, ICD 32:7-13: R, ICD 31:19: IU, ICD	
36	2-5 and 12-16	R, FSPK, ICD	
37	10-11, 15-16 and 18-22	VA, R, ICD	
38	1-9	R, FSPK, ICD	
39	5-9	R, ICD	
42	20 (from "When") – 22	R, FSPK, ICD	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
43	1-5 10 (from "Do") – 16 19 and 22	43:1-5, 10-13: R, FSPK, ICD 43:14-20: VA, FSPK, R, ICD	
44	1-2, 7-9 and 12 21 ("After") - 22	43:22-44:2: VA, FSPK, R, ICD 44:7-12: VA, FSPK, R, ICD 44:22: IU, ICD	
45	1, 5, 7-8, 14 and 16-20	45:1-14: VA, FSPK, R, ICD 45:16-20: FSPK, R, ICD	
51	2-3, 6, 9-10 and 12-22	51:2-10: VA, R, ICD 51:12-22: R, ICD	
52	1-22	R, ICD	
53	1-4	R, ICD	
54	19 and 22	VA, FSPK, ICD	
55	1, 3-12 and 16-22	ICD	
58	14-19 [Replace "Deposition Exhibit 14" with Def Ex]	IU, FSPK, R, ICD	
60	2	IU, ICD	
63	5 (from "It's") -6 , and 19- 22 [Replace "Deposition Exhibit Number 14" with Def Ex]	IU, ICD	
64	2 (from "When") – 11	FSPK, VA, ICD	
65	3-4 6 (from "Now") – 22	R, FSPK, ICD	
66	1-7	IU, R, FSPK, ICD	
68	5-7 and 11-12	VA, R, ICD	
86	16-21 [Replace "Deposition Exhibit Number 1" with Def Ex]	IU, FSPK, R, ICD	
87	1 8 (from "And") – 19	IU, ICD, IO	
89	2-7, 19 and 21-22	89:2: IO, ICD 89:3-19: ICD	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
90	1-8	IO, R, ICD	
92	11-15 and 21-22	VA, ICD	
93	2-7 14 (from "And") – 16, and 22	93:14-22: VA, IO	93:8-13
94	1-2 and 19-22	94:1-2 94:19-22: ICD, R	
95	1-7 and 17-22	ICD, R, IR	
96	1-3, 10-12 and 15	ICD, IR, MS, FSPK	
97	5 6 (from "And") – 22	ICD, IR, IO	
98	1-13, 16-19 and 21-22	ICD, IO, ET, FSPK	
99	1-12 and 21	ICD, FSPK	
100	1 (from "In") – 5 and 10-14	VA	
101	6-18 [Replace "Exhibit Number 8" with Def Ex]	ICD, FSPK	
102	5 7 (from "And") – 10 14 and 22	ICD, FSPK	
103	1-21	102:22-103:13: ICD 103:14-22: FSPK	
104	4-18	104:4-5: FSPK, ICD 104:7-9: ICD 104:10-22: C, FSPK, ICD	
105	1-2, 4-8, 12, 16 and 22	105: 1-2: C, FSPK, ICD 105:4-16: FSPK, ICD	
106	1-21	ICD, FSPK	
107	3-8, 13-14, 16-18 and 20	107: 3-14: ICD, AF 107:16-20: AA, ICD	
108	11-18 [Replace "Exhibit Number 10" with Def Ex]	ICD, FSPK, IR	
109	3-22	ICD, IR	
110	1-9	ICD, IR	
111	6-22	ICD, IR	
112	1-22	ICD, IR	
113	1-22	ICD, IR	
114	1-22	ICD, IR	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
116	20-22 [Replace "12" and "Exhibit Number 12" with Def Ex]	ICD, IR	
117	1-22	ICD, IR	
118	1-4 and 16-18	118: 1-4: ICD 118:16-18: VA, FSPK	
119	2-5 and 11-22 [Replace "Exhibit Number 11" with Def Ex]	ICD	
120	1		120:2-14
123	2-13 [Replace "Exhibit Number 3" with Def Ex] 18-22	ICD	
124	1-3 and 9-22	ICD, IR	
125	1-7	ICD, IR	
129	5 and 8-15 18 (from "So") – 20 21 (from "And") – 22	ICD, IR	
130	1, 5, 7-8, 18-20 and 22	ICD, IR, FSPK, H	
131	1-4, 10, 13 and 20-21	ICD, IR, FSPK, H	
132	3-4, 6-9, 11-19 and 21-22	ICD, IR, FSPK, H	
133	1-22	ICD, IR, FSPK, H	
134	3-4 and 14-15	ICD, IR, FSPK, H	
136	2-5, 9-11 and 20-21	ICD, IR, FSPK, H	
137	2, 12-13 and 18-22	137:2: ICD, IR, FSPK, H 137:12-22: VA, IO, ICD, H	137:4-9
138	1 and 22	138:1: VA, IO, ICD, H 138:22: MS, ICD, FSPK	
139	1-3 and 7	MS, ICD, FSPK	
142	12-22	ICD	
143	1-22	ICD	
144	1-10 16 (from "Now") – 22	ICD	
145	1 (from "Did") – 22	ICD, FSPK	
146	1-21	146:1-17: ICD, FSPK, H	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
		146:18-22: VA, L, ICD, FSPK	
147	9-13	L, ICD	
150	5 (from "what") – 22	ICD	
151	1-5 and 11-19	ICD, FSPK	
152	3 and 22	152:22: C, L, ICD	
153	1-3, 6-8 and 10-19	153:1-8: ICD, L, C 152:10-15: ICD 153:16-19: L, ICD	
154	2-7 and 9-13	154:2-7: ICD, L 154: 9-15: VA, ICD	
155	14-22		155:7-13
156	1-8, 13 (from "can") -14 and 17-22 [Replace "Plaintiff's Exhibit Number 23" with Def Ex]	156:4-10: MS	
157	1 (from "I'm") – 5 8-12, 16-17 and 21	ICD	
158	1-2, 7-8, 10-12, 17 and 19-22 [Replace "Plaintiff's Exhibit Number 17" with Def Ex]	ICD, AA, FSPK, L, VA	
159	1-10 and 15	ICD	
164	6-13, 17, 19-20 and 22	ICD, F/A, FSPK, AF	
165	2-5, 16-18 and 22	ICD, AA, FSPK, F/A, AF	
166	6, 9-11 and 17-19	FSPK, F/A, AF, AA, IO	
167	3-10 and 16-22 [Replace "Deposition Exhibit Number 18" with Def Ex]	FSPK, F/A, AF, AA, IO	
168	14-16 and 18-21	FSPK, F/A, AF, AA, ICD	
169	1-6, 13-15, 17 and 19-22	FSPK, F/A, AF, ICD	
170	1-6, 9, 11-18 and 22 [Replace "Number 19" with Def Ex]	ICD, FSPK	
171	1, 9-10, 12-15, 19 and 21-22 [Replace "Exhibit Number 19" with Def Ex]	FSPK, F/A, AF, ICD	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
172	1, 3-4, 6-9, 12-15 and 18-22	FSPK, F/A, AF, ICD	
173	1-2 and 16-22	ICD	
174	1-4 6 (from "let's") [Replace "Number 20" with Def Ex] 9-22	ICD	
175	1-9 and 14-22	ICD	
176	1-5, 8-9, 11-13, 16 and 18- 22	ICD, FSPK	
177	1-2 11 (from "and") [Replace "Number 21" with Def Ex] 20-22	ICD	177: 3-8
178	1-2 and 16-18	178:1-2: ICD 178:16-22: ICD, FSPK, F/A, AF	
179	4-6 and -22	179:1-6: ICD, FSPK, F/A, AF 179: IU, ICD	
180	1, 13-17 and 21 [Replace "Exhibit Number 24" with Def Ex]	180: IU, ICD 180:13-21: ICD, FSPK, AF, F/A	
181	1 (from "Do")- 2 5, 7-9, 11, 13-14, 19 and 21- 22	181:1-11: ICD, FSPK, AF, F/A 181:13-22: FSPK, AF, L, ICD	
182	10-14 and 22	ICD, FSPK, AF, IO, ET	
183	2-8 and 15-19 [Replace "Exhibit Number 25" with Def Ex]	ICD, FSPK	
184	4-6, 12-13, 15-16, 19-20 and 22	184:4-13: L, ICD 184:15-20: AA, ICD	
185	1, 8-9, 11, 13-14 and 19-22 [Replace "Exhibit Number 26" with Def Ex]	ICD, FSPK, AA, AF, IO, ET	
186	1-2, 10-12, 15 and 17-22	F/A, FSPK, AF, ICD	
187	1-4, 11-14 and 16-21	AF, MS, VA, ICD	
188	6-9 and 15-19 [Replace "Exhibit Number 27" with	FSPK, F/A, AF, ICD	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
	Def Ex]		
189	5-6, 10, 12-13, 18-19 and 21-22	189:5-10: FSPK, F/A, AF, ICD 189:12-19: FSPK, F/A, AF, ICD, MS	
190	1-2 and 5-17	190:1-14: FSPK, F/A, AF, ICD, MS 190:15-17: AA, FSPK, F/A, AF, ICD	
191	2-15, 17-18 and 21-22 [Replace "29" with Def Ex]	ICD, FSPK, F/A	
192	1-10 12-13 [Replace "Number 30" with Def Ex] 16-22	ICD, FSPK, F/A	
193	1-3 and 19-22	ICD, FSPK, F/A	
194	1-5 and 18-22	ICD, FSPK, F/A, VA	
195	1-15 and 18-22	195:1-19: FSPK, ICD, F/A 195:21-22: L, VA, FSPK, ICD, F/A	
196	5 and 8 (from "let's") [Replace "31" with Def Ex] 11-20 [Replace "Exhibit Number 31" with Def Ex]	196:1-5: FSPK, ICD, F/A, VA, L 196:8: F/A, ICD 196:11-22: FSPK, R, ICD	
197	4-5, 9, 11-12, 16 and 18-22	197:4-9: VA, F/A, FSPK, R, ICD 197:11-22: F/A, FSPK, R, ICD	
198	1-8 and 12-18	198:1-15: F/A, FSPK, ICD 198:16-22: F/A, FSPK, ICD, AF	
199	6-8, 13-15, 19-20 and 22 [Replace "32" with Def Ex]	F/A, FSPK, ICD, AF	
200	1, 3-4, 9-11, 15-16, 18-20 and 22	F/A, FSPK, ICD, AF	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
	[Replace "Exhibit Number 33" with Def Ex]		
201	2-3, 7-15, 18 and 22 [Replace "34" with Def Ex]	F/A, FSPK, ICD, AF	
202	1-2, 4-5, 8-10, 13, 17-19 and 21-22 [Replace "35" with Def Ex]	202:1-2: F/A, FSPK, ICD, AF 202:4-8: F/A, FSPK, ICD, AF, AA, L 202:9-22: F/A, FSPK, ICD, AF	
203	1, 7-10, 16, 19 and 21	F/A, FSPK, ICD, AF, R	
204	1, 4-7, 9-10, 15, 18 and 20-21	204:1-7: F/A, FSPK, ICD, AF, AA 204:9-22: F/A, FSPK, ICD, AF	
205	1-2, 4-6, 9-10, 12-15, 18-19 and 22 [Replace "37" with Def Ex]	F/A, FSPK, ICD, AF, VA, AA	
206	1, 5-6, 14-15, 19 and 21	F/A, FSPK, ICD, AF, R	
207	1-3, 5-7, 12-15, 17-18 and 21-22	F/A, FSPK, ICD, AF, R	
208	2-17	FSPK, ICD, AF	208:9-13
209	1-4 and 6-17	ICD	209:1-4
210	2-4, 6-15 and 18-19	MS, AF, ICD	
211	3-5, 7-12 and 14-22	ICD, MS, AF	211:3-20
212	1-11 and 17	ICD, FSPK, AF	
213	1-2 [Replace "38" with Def Ex] 7-9, 11-12, 14 and 16-22	F/A, FSPK, ICD, AF, R	
214	4-5, 7-11, 14, 19-20 and 22 [Replace "39" with Def Ex]	F/A, FSPK, ICD, AF, R	
215	1-2, 4-5 and 7-22	F/A, FSPK, ICD, AF, R	
216	203 [Replace "40" with Def Ex] 6-7, 14-15, 17-18 and 21-22	F/A, FSPK, ICD, AF, R	
217	2-4, 8 and 10-20	F/A, FSPK, ICD, AF, R	
218	2-5, 7-10 and 16-21	F/A, FSPK, ICD, AF, R, IH	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
219	1-5, 9-12, 14-15 and 21-22	C, ICD, AF, R, MS	
220	1, 3-6, 9-11 and 14-18 [Replace "41" with Def Ex]	MS, ICD, AF, R, F/A, FSPK	
221	2-3, 5, 7-12, 16-18 and 21 [Replace "42" with Def Ex]	MS, ICD, AF, R, F/A, FSPK	
222	4-5, 7-8, 12-13 and 15-20	222:1-13: MS, ICD, AF, R, F/A, FSPK 222:15-22: ICD, AF, R, FSPK, L, C	
223	6-9, 11-14 and 22	ICD, AF, R, F/A, FSPK	
224	1-2, 5-8, 11, 16-17, 19-20 and 22 [Replace "43" with Def Ex]	ICD, AF, R, F/A, FSPK	
225	2-10, 17, 19 and 21-22	ICD, AF, R, F/A, FSPK, L, C	
226	1-2 [Replace "44" with Def Ex] 5, 10-12, 14-15 and 19- 22	F/A, FSPK, AF, R, ICD	
227	1-19	227:1-16: ICD 227:17-22: AF, FSPK, ICD, R	
228	5-6, 8-10 and 12-15 [Replace "17 to 44" with Def Ex # - #]	AF, FSPK, ICD, R	
230	4, 6-9 and 22	AF, VA, ICD	
231	1, 3-7, 10, 13, 17-20 and 22	C, L, AF, AA, ICD	
232	1-22	ICD	
233	1-3 and 9	ICD	
341	9-21	ICD, AA	
342	4, 5-7 and 18-20 [Replace "21" with Def Ex]	ICD, F/A, FSPK, AF	
343	4, 6-12, 17-18 and 20-22	ICD, F/A, FSPK, AF, IH	
344	1-6 and 17-22		
345	1-7, 17 and 19-22	ICD, IR, AF	
346	1-2, 9, 11-15, 17 and 19-22	ICD, IR, AF, L, H, FSPK, AF	
347	1, 8, 10, 15	AF, MS, H, IO, AA, ICD	
348	8 (from "Do") – 11	ICD	
350	9-14 and 18	MS, ICD, L, AF	

**Deposition of Rami Sarabi
March 2, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
74	14-22		
75	1-3 [Subject to ruling on Defendant's objections]		
94	6-11 and 18-22		
95	1-2		

**Deposition of Monroe Tinker
January 6, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
58	3-6 and 8-13	IH, FSPK	57:21-58:2
65	21-22	FSPK	66:1-2
66	3-22	66:3-4: FSPK	66:1-2
67	1-11		
68	12-17 and 20-22	A, H	68:18-19
69	22	ICD, A, AA, NC	70:5-9
70	1-4, 10, and 19-22	70:1-10: ICD, A, AA, NC	70:5-9
71	1-7		
73	16-20 and 22	L, A	73:21
74	1-17	74:1-4: L, A	73:21
77	14-18	ICD, F, SP	
78	3-12 and 20-22	ICD	77:19-20, 78:13-19
79	1-14 and 20-22	ICD, FSPK	
80	1-11 and 16-20	80:1-9: ICD, FSPK, H 80:10-20: ICD, A, FSPK, H	80:12-15
81	4-22	81:4-13: ICD, FSPK, IH, AF 81:18-22: ICD, FSPK, H	
82	1-6	ICD, FSPK, H	82:7-14
83	3-16 and 20-22	83:3-5: ICD, FSPK 83:6-12: ICD, FSPK, UN 83:20-22: ICD, FSPK, IH, H	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
84	1-18	84:1-10: ICD, FSPK, IH, H 84:11-14: ICD, FSPK, IH, H, AF	
85	6-22	ICD	
86	1-21	86:1-19: ICD, IH, FSPK 86:20-22: ICD, IH, FSPK, AF	86:22-87:1
87	2-22	87:2-3: ICD, IH, FSPK, AF 87:4-10: ICD, IH, FSPK 87:11-22: ICD, FSPK	86:22-87:1
88	1-16	ICD, FSPK	89:4-90:19, 92:18-93:1
90	20-22	ICD	89:4-90:19, 92:18-93:1
91	1-21	ICD, IH, FSPK	89:4-90:19, 92:18-93:1
92	2	ICD, IH, FSPK	89:4-90:19, 92:18-93:1
93	2 (from "And") - 22	ICD, IH, FSPK	
94	1-22	ICD, IH, FSPK	
95	1-22	ICD, IH, FSPK	
96	1-22	ICD, IH, FSPK	
97	1-8 and 20-22	97:1-8: ICD, IH, FSPK, H 97:20-21: ICD, IU, FSPK, H 97:1: ICD, UN	97:9-11 97:15-19
98	1-3 and 19-22	98:1-3: ICD, UN 98:19-22: ICD, FSKP, H	
99	1-22	99:1-3: ICD, FSPK, H, IH 99:4-11: ICD, FSPK, H, NC, IH 99:12-22: ICD, FSPK, H, IH	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
100	1-22	100:1-18: ICD, FSPK, H, IH 100:18-22: ICD	
101	1-2	ICD	101:3-5
114	3 and 6-7	R	114:4-5
115	1-5	R	114:4-5
179	13-22	179:19-22: ICD, FSPK, NC	
180	1-14	180:1-2: ICD, FSPK, NC 180: ICD, FSPK, NC, R	
181	14-16 and 20	ICD, IH, SP, IO	

**Deposition of Adam Waldman
February 15, 2022**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
150	8 (from "and") - 9		

**Deposition of Laura Allison Wasser
December 16, 2020**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
6	13-22		
7	1-2 13 (from "you") - 19		
13	21-22		
14	1-8	R; IO; FSPK; IH; ICD; ET	
15	4 (from "The") - 6	R; IO; FSPK; IH; ICD; ET	
21	12-16 and 19-20	R; IO; FSPK; IH; ICD; ET	
22	4-11	R; IO; FSPK; IH; ICD; ET	
23	2 (from "when") - 17	R; IO; FSPK; IH; ICD; ET	23:1-2 (to "theory")
24	10	R; IO; FSPK; IH; ICD; ET	
31	15-18 and 21	R; IO; FSPK; IH;	

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
		ICD; ET	
35	22	R; IO; FSPK; IH; ICD; ET	
36	1-2 and 11-22	R; IO; FSPK; IH; ICD; ET	
37	1-2	R; IO; FSPK; IH; ICD; ET	
48	7-11		
58	4-10 and 15-22	R; IH; AR	
59	1-2 and 9-15	R; IH; AR	
64	10-13	R; SP; IH; IU	
65	3-15	R; SP; IH; IU	
70	17-20	FSPK	
71	3-4 and 12-19	R	
72	6-9	R	
90	3-19	R; H; SP	90:20-91:19
91	21-22	R; H; SP; FSPK; IU	
92	1-7, 12-17 and 19-22	R; H; SP; FSPK; IU	
93	1-4 and 8-10	R; H; SP; FSPK; IU	
94	4-15 and 18-19	R; AR; ICD	
95	1-10 and 15-22	R; IU	
96	5-8	R	
97	5-13 and 21-22	R; H	
98	1-4, 8-17 and 21	R; IU	
99	3-8, 13-15 and 19-22	R; AR; MS; AA;	
100	1-3 and 22	R; AR; MS; AA	
101	1-2 and 5-22	R	
102	1-22	R; H; FSPK	
103	1-5	R; H; FSPK	
105	3 (from "Ms.") – 16	ICD; R	
108	3-5 and 10-18	R; H; FSPK; ICD	
109	4-16	R; FSPK	
111	7-10 and 16-22	R; FSPK	
112	1-9 and 22	R; FSPK	
113	1-8	R; FSPK	
116	3-8 and 13-22	R; AA; MS; NC; VA; AF	
118	13-20	R	
120	15-22	R; FSPK; AA; MS; VA	
121	1-2 and 17-21	R	
122	2-7 and 12	R	
126	17 (from "when") – 22	R	
127	1-7	R	

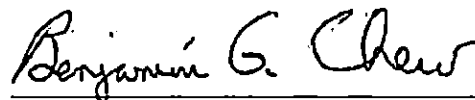
PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
128	1-3 and 20-22	R; VA	
129	1-6	R; VA	
130	18-22	R; FSPK	
131	1-10	R; FSPK; MS	
132	10-14 and 16-22	R; AF	
133	1-2, 7-12 and 20	R; AA	
136	7-8 and 11		
165	18 (from "I'm") - 22	R	
166	1 and 11-15	R	
167	12	R	
170	4 (through "Wasser") 12-22	R	
171	1-11 and 22	R; H; AA	170:4-11
173	14-22		
174	1-22	R; H; ICD	
175	1-17	R; ICD	
176	4-7 and 12-22	R; ICD	
177	1-7 and 10-13	R; ICD	
187	17-22	R; S; IR; H	
188	1, 9-16, 19 and 22	R; H; F/A	
189	1, 6 and 18-22	R	
190	1-5 and 22	R	
191	1-5 and 11-12	R; AF; FSPK	
192	8-22	R; IH	
193	1-3 and 17-21	R; IH	
197	6-9 and 20-22	R; SP; FSPK; AF; AR; H	
198	1-10	R	
199	10-13 and 18-22	R; SP; FSPK; AF; AR	
200	1-2 and 20-21	R	
201	7-16	R; IO; ET; FSPK	
203	18-22	R; IU; IH; VA; SP	203:12-17
204	1	R; IU; IH; VA; SP	
221	6-22	R; H; IR	
222	1-2	R; H; IR	
223	1-8 and 13-15	R; IU; IH; VA; SP	
225	21-22	R; IU; IH; VA; SP	
226	1-3 and 15-16	R; IU; IH; VA; SP	
228	21-22	R	
229	1-12	R	

**Deposition of Jack Whigham
January 20, 2021**

PAGE	LINE	OBJECTIONS	REBUTTAL DESIGNATIONS
73	20 (from "can") – 22	R, SP, FSPK, C	73:10-17
74	1 and 4-6	R, SP, FSPK, C	73:10-17
76	17-22	R, H	
77	1-11	R, H	

Dated: March 25, 2022

Respectfully submitted,



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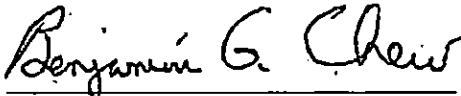
CERTIFICATE OF SERVICE

I hereby certify that on this 25th 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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