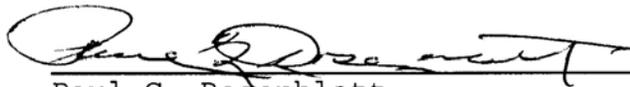


1 or which suggests an answer to the deponent is an improper speaking objection.
2 Both sides have submitted sample objections made by the defendants' counsel and
3 the Court agrees with the plaintiffs that some of the cited objections are in fact overly
4 verbose, improperly argumentative, and/or improperly suggestive of the answer to
5 be given by the deponent.¹ The Court expects all future deposition objections to be
6 succinct, nonargumentative, and noncoaching. Therefore,

7 IT IS ORDERED that the plaintiffs' Motion for Sanctions Pursuant to Rule
8 30(d)(2) (Doc. 121) is granted and that all counsel shall limit their deposition
9 objections to concise, nonargumentative, and nonsuggestive statements, as required
10 by Fed.R.Civ.P. 30(c)(2).

11 DATED this 29th day of January, 2016.

12
13 
14 Paul G. Rosenblatt
15 United States District Judge
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17

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19 1

20 The Court concludes that the following objections by the defendants'
21 counsel are examples of improper speaking objections:

- 22 • "Also object on the basis of foundation as this document. It says 11/25
23 of 2014 was the adoption date so that's after Karen Garner's incident
24 just for the record."
- 25 • "I am going to object to this question on the basis that it's incomplete in
26 terms of you didn't read the entire document and also foundation since
he said he was not a sworn deputy. Go ahead and answer if you can."
- "Object to the form of the question; he's already told you he didn't know
the voice."