

Chambers Copy



PLAINTIFFS' OCTOBER 28, 2008 DESIGNATION OF DEPOSITION TESTIMONY OF BENJAMIN KPEREGBEYI
 (Testifying By Way of Deposition Only)
 (Counter-Designations in italicized text)
 Deposition October 10 & 12, 2006

Page/Line Cite	Defendants' Objections and Counter-Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations	Defendants' Cross-Examination Designations	Plaintiffs' Objections and Counter-Designations	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations
	4:3, 5:5-10, 8:23-9:6, 11:25-12:14, 13:12-22 <i>S. M. Williams</i>	Counter-designations irrelevant and prejudicial; Plaintiffs' wholly designations are from day two of the deposition where deponents' testimony was given under oath. FRE 401-403.			
21:3-14					
21:18-19					
25:8-10					
36:14-20	Testimony that concerns January 1999 is irrelevant, confusing and a waste of	Testimony that boats cannot leave Escravos without approval from			

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66:18-20; 66:23-67:1, 21	<p>time. Whether Seatruck performed transport for CNL does not relate to plaintiffs' claims. FRE 401-403.</p> <p align="center"><i>OR</i></p>	<p>CNL relevant to show control by CNL over GSF. Witness possesses personal knowledge of degree of control exerted by CNL. Form of question appropriate for witness not affiliated with plaintiffs.</p>			
66:18-20; 66:23-67:1, 21	<p>Whether a Seatruck needs approval before leaving Escravos is unrelated to Parabe and will confuse the jury. FRE 401-403.</p>	<p>Testimony that boats cannot leave Escravos without approval from CNL relevant to show control by CNL over GSF. Witness possesses personal knowledge of degree of control exerted by CNL. Form of</p>			
	<p>66:18-20: Questions are leading and each question and testimony in response should be stricken. FRE</p> <p align="center"><i>OR</i></p>				

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611.		question appropriate for witness not affiliated with plaintiffs.			