			T	1					l		7
SFI-582640v1 SFI-596925v1	<b></b>	24:4-25:7	14:14-16	12:13-16	12:1, 6-9	6:12-14	6:2-6	Page/Line Cite			
		Irrelevant, confusing and a waste of time.			Irrelevant. ChevronTexaco Global Technologies has no involvement whatsoever in this litigation, and the question and answer refer to 2003, years after the events at issue. FRE 401-403.			Defendants' Objections and Counter- Designations			
						The state of the s		Plaintiffs' Responses to Defendants' Objections and Objections to Counter- Designations	Counter-Designations in Italicized text Deposition on March 4, 2003	PLAINTIFFS' DESIGNATION OF RICK BROWN	
								Defendants' Cross- Examination Designations	farch 4, 2003	ION OF RICK BR	
								Plaintiffs' Objections and Counter- Designations		NWO	
Ac	log	96rs	IUE					Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations			

		PLAINTIFFS' DESIGNATION OF RICK BROWN (Counter-Designations in italicized text)  Denosition on March 4, 2003	ION OF RICK BR s in italicized text) farch 4 2003	OWN	
Page/Line Cite	Defendants' Objections and Counter- Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter- Designations  Deposition on March 4, 2003  Defendant Cross-  Cross-  Examination  Designation	Defendants' Cross- Examination Designations	Plaintiffs' Objections and Counter- Designations	Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations
	FRE 401-403. Further, the desiganted testimony relates to events in 1993, years before the matters at issue in this case.				
25:18-25					
38:17-19					
38:24-39:15					
235:20-236:24	FCPA review is a legal requirement and is therefore not evidence of agency or any other theory of liability. See Dkt. # 1853 (jury instructions) at 37 (ffCPA review "should not be considered as evidence of agency").				

		244:20-25			243:2-244:19
				This testimony is therefore irrelevant. FRE 401. Further, any probative value this testimony has is substantially outweighed by its unfair prejudice and waste of time. FRE 403. FCPA review analyzed only whether a proposed payment complied with federal law, not whether it was a good business decision. Admitting this evidence would necessitate a mini-trial on the nature and purpose of FCPA review.	
Defendants' Responses to Plaintiffs' Objections and Objections to Counter-Designations	Plaintiffs' Objections and Counter- Designations	Defendants? Cross- Examination Designations	Plaintiffs' Responses to Defendants' Objections and Objections to Counter- Designations	Defendants' Objections and Counter- Designations	Page/Line Cite
		[arch 4, 2003	Deposition on March 4, 2003	·	
		s in italicized text)	(Counter-Designations in italicized text)		
	OWN	ION OF RICK BR	PLAINTIFFS' DESIGNATION OF RICK BRO		

		- · · · · · · · · · · · · · · · · · · ·
245:24-246:22		Page/Line Cite
		Defendants' Objections and Counter- Designations
		PLAINTIFFS' DESIGNATION OF RICK BROCK (Counter-Designations in italicized text)  Deposition on March 4, 2003  Plaintiffs' Responses to Defendants' Objections and Objections to Counter-Designations  Designations  Designations
	245:13-23	ION OF RICK BR Is in italicized text) Iarch 4, 2003 Defendants' Cross- Examination Designations
		OWN  Plaintiffs' Objections and Counter- Designations
		Defendants' Responses to Plaintiffs' Objections and Objections to Counter- Designations