

PLAINTIFFS' DESIGNATION OF DEPOSITION TESTIMONY OF OLA-JUDAH AJIDIBO
(Counter-Designations in italicized text)

Deposition October 27 & 28, 2005

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
8:5-8					
9:2-3,10,12					
9:14-23					
10:1-2,4-7					
10:9-19					
10:22-25			13:25-14:1		
14:6-10					
			15:11, 15:16-17, 15:20, 15:25-16:1, 16:8		
21:4-5					
21:7-9					

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21:11-16					
21:19-22:4					
26:4-10	FRE 401-403 Cumulative waste of time.				
28:22-23					
28:25					
32:2-6					
32:8-15, 17					
32:24-33:4					
34:5-8, 15-17					

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35:13-14, 17-18					
39:22-40:2					
40:8 (beginning with "Did" -40:10					
40:15-16					
41:8-42:5	41:13-15 Hearsay. FRE 802. 				
70:7-10					
70:13-15, 17					
72:10-12, 15	Improperly leading. FRE 611(c) 				
			94:18-20, 95:2-8		
			95:13-14, 95:20-22		

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100:11-12	Leading, lacks foundation, vague FRE 401, 403, 602 611(c). 		96:4-14		
100:14-15	Leading, lacks foundation, vague FRE 401-403, 602, 611(c). 				
100:19-25					
101:3, 5-8					
101:13-19					
101:22-102:1					
102:4-18					
102:21-103:15					

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104:4-6					
104:12-18	Hearsay. FRE 802.				
104:21-105:6	104:25-105:6 Hearsay. FRE 802. To the extent that this is relevant for any nonhearsay purpose, it is substantially more prejudicial than probative. FRE 401-403.				
105:19-106:4					
106:6 (starting at "Did") - 106:10					
106:17-20					
106:23-107:2					
107:5-6, 8, 10, 12	Improperly leading				

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	FRE 611(c).				
107:23-24					
108:1-17					
109:12-23					
110:1-9					
111:11-22	This is an answer without a question, and is therefore confusing, irrelevant and a waste of time. FRE 401-403. Further, to the extent this is intended to introduce the deponent's testimony regarding the contents of the letter, it lacks foundation and is hearsay because the deponent never read	<p><i>Start at 110:25 - 111:9</i></p> <p><i>of letter</i></p>			

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	the letter. Rather, he was told what it said by a third-party. See 392:13-394:9. Further, the best evidence of the content of the letter is the letter itself. FRE 1002.				
			124:16-17, 124:21		
			124:23-125:1,		
			125:3-4, 125:7		
			125:16-17, 125:19		
			128:15-17,		
			128:24-25, 129:4		
			129:23-25		

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			132:5-12		
			152:3-153:8		
			154:23-155:7		
			158:19-25		
			166:17-20		
			172:9-173:17		
			174:2-5		
			174:15-176:7		
			180:6-180:8		
			182:20-183:5		
			191:9-12		
			196:6-12		

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198:24-199:1					
199:15-20					
			213:23-214:22		
			215:13-216:22		
			235:3-10		
			242:5-13		
			244:16-245:3		
			246:7-247:6		
			289:16-18		
			309:21-24		
			350:18-22		
			353:13-354:2		

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			355:7-356:8		
			358:5-14		
			358:14-359:21		
			361:16-23		
			362:1-23		
			373:2-11		
			374:14-17		
			378:9-379:9		
			379:23-380:3		
			380:5-11		

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390:1-3					
390:5-10					
			390:17-24		
			394:12-398:23		
			404:10-406:19		
			408:7-9		
			409:25-412:7		
			412:15-25		
			413:5-15		
			413:21-25		
			414:4-19		
			414:25-415:2		

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			417:14-22		
			417:24-418:4		