

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

THE WEATHER UNDERGROUND, INC.,
a Michigan corporation,

Plaintiff,

vs.

Case No. 2:09-CV-10756
Hon. Marianne O. Battani

NAVIGATION CATALYST SYSTEMS, INC.,
a Delaware corporation; CONNEXUS CORP.,
a Delaware corporation; FIRSTLOOK, INC.,
a Delaware corporation; and EPIC MEDIA
GROUP, INC., a Delaware corporation,

Defendants.

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**DEFENDANTS CONNEXUS CORPORATION, FIRSTLOOK, INC., AND
NAVIGATION CATALYST SYSTEMS, INC.'S OBJECTIONS TO PLAINTIFF'S
DESIGNATIONS IN DEPOSITION OF LILY STEVENSON**

OBJECTIONS TO DEPOSITION DESIGNATIONS

Defendants Connexus Corporation, Firstlook, Inc., and Navigation Catalyst Systems, Inc. (collectively “Defendants”) hereby object to Plaintiff’s deposition designations in the Deposition Transcript of Lily Stevenson as follows:

<u>Exhibits</u>	<u>Objection</u>
97	Hearsay (FRE 802); Irrelevant (FRE 401); constitutional right of privacy.
100	Irrelevant (FRE 401)
101	Hearsay (FRE 802); authentication (FRE 901); lack of foundation (FRE 602).
115	Hearsay (FRE 802); irrelevant (FRE 401).
116	Hearsay (FRE 802); irrelevant (FRE 401).
117	Hearsay (FRE 802); authentication (FRE 901)
118	Hearsay (FRE 802); authentication (FRE 901)
125	Hearsay (FRE 802); authentication (FRE 901); lack of foundation (FRE 602).

<u>Deposition Designation</u>	<u>Objection</u>
14:3-17	Irrelevant (FRE 401); constitutional right of privacy.

17:9-15	Hearsay (FRE 802)
56:7-20	Lacks foundation (FRE 602)
81:4-23	Lacks foundation (FRE 602)
84:10-16	Lacks foundation (FRE 602); improper lay testimony (FRE 702).
91:4-12	Irrelevant (FRE 401).
95:16-96:4	Lacks foundation (FRE 602)
140:16-141:4	Speculative, lacks foundation (FRE 602)
169:13-173:24	Irrelevant (FRE 401)
175:6-16	Speculative, lacks foundation (FRE 602)
175:17-179:6	Irrelevant (FRE 401); unfairly prejudicial (FRE 403).
180:5-13	Irrelevant (FRE 401); unfairly prejudicial (FRE 403).
180:14-183:12	Irrelevant (FRE 401); unfairly prejudicial (FRE 403).
183:13-186:6	Irrelevant (FRE 401); unfairly prejudicial (FRE 403);Hearsay (FRE 802).
186:9-187:23	Irrelevant (FRE 401); unfairly prejudicial (FRE 403);Hearsay (FRE 802).
216:7-224:24	Irrelevant (FRE 401); unfairly prejudicial (FRE

	403).
223:1-21	Lacks foundation (FRE 602); authentication (901); hearsay (FRE 802).
226:3-228:23	Lacks foundation (FRE 602); authentication (901); hearsay (FRE 802).

Defendants object to exhibits on the bases set forth in the Exhibit List filed with the Bench Book on February 28, 2012.

Respectfully Submitted,

Dated: May 25, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2012, I electronically filed the foregoing paper with the Court using the ECF system which will send notification of such filing to the following:

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