

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

SAINT LOUIS UNIVERSITY,	)	
a Missouri benevolent corporation,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:07CV1733 CEJ
	)	
AVIS MEYER,	)	
	)	
Defendant.	)	

**PLAINTIFF SAINT LOUIS UNIVERSITY’S OBJECTIONS AND COUNTER-  
DESIGNATIONS TO DEFENDANT’S DISCOVERY DESIGNATIONS**

COMES NOW Plaintiff Saint Louis University (“Plaintiff”), by and through its undersigned counsel and in accordance with this Court’s Case Management Order dated February 7, 2008 [dkt # 12], to hereby submit its Objections and Counter-designations to Defendant Avis Meyer’s Discovery Designations [dkt # 88], as follows:

**I. Deposition Designations**

Deposition of Avis Meyer, June 4, 2007			
From	To	Objection	Counter-designations
40:2	43:7	Relevancy	
44:22	46:8	Relevancy	
46:16-20		Relevancy	
48:10-21		Relevancy	
56:22	57:11	Relevancy	
61:24	62:15	Relevancy	
73:12	74:19	Relevancy	
75:15	77:2	Relevancy; Hearsay	
78:1-21		Relevancy	
79:5	83:21	Relevancy; Hearsay	
83:24	84:22	Relevancy; Completeness	
85:25	90:6	Relevancy; Hearsay	
90:13	91:19	Relevancy	
92:5	93:22	Relevancy	
99:22	100:4	Relevancy	

Deposition of Avis Meyer, June 4, 2007

<b>From</b>	<b>To</b>	<b>Objection</b>	<b>Counter-designations</b>
106:8	109:4	Relevancy; Hearsay	
110:3-11		Relevancy	
112:7	114:12	Relevancy	
124:3	125:7	Relevancy	123:19 – 124:2
125:25	126:5	Relevancy	
127:2	129:1	Relevancy; Incomplete	126:6 – 127:1
132:3-25		Relevancy	
134:11-23		Relevancy	
135:24	139:18	Relevancy	
141:6	144:8	Relevancy	
144:17	146:21	Relevancy	
147:24	151:11	Relevancy; Hearsay	
151:15	152:4	Relevancy	
152:21	153:15	Relevancy	
154:2-15		Relevancy	
165:17	171:21	Relevancy; Hearsay	
172:1	175:20	Relevancy	
186:16	187:2	Relevancy	
197:2	199:3	Relevancy; Hearsay	200:14 – 19; 202:16 – 20

Deposition of Diana Benanti, June, 12, 2007

<b>From</b>	<b>To</b>	<b>Objection</b>	<b>Counter-designations</b>
23:5-14		Relevancy; Incomplete	
24:14-24		Relevancy; Incomplete	
25:1-7		Relevancy	
25:17-20		Relevancy	
26:2-21		Relevancy	
27:1	28:1-22	Relevancy; Incomplete	
28:16	29:16	Relevancy	
30:24	31:6	Relevancy; Hearsay; Incomplete	
36:12	37:1	Relevancy	
40:20	41:6	Relevancy; Incomplete	
44:21	45:14	Relevancy; Hearsay; Incomplete	
48:9-13		Relevancy; Hearsay; Incomplete; Foundation; Conjecture	
52:21	56:10	Relevancy; Incomplete; Hearsay	
60:3	63:9	Relevancy; Hearsay	
67:4	69:23	Relevancy; Hearsay	
70:10	72:2	Relevancy; Hearsay	
80:17	82:6	Relevancy; Hearsay; Incomplete	
91:1	92:20	Relevancy	
94:20	95:5	Relevancy; Incomplete	

## **II. Answers to Interrogatories**

### **A. Plaintiff's Answers to Defendant's First Set of Interrogatories**

Defendant proposes to offer into evidence Plaintiff's Answer to Defendant's Interrogatory Nos. 7, 10.

**OBJECTION:** Plaintiff objects to the relevancy of Plaintiff's Answer to Defendant's Interrogatory Nos. 7, 10.

### **B. Defendant's Answers to Plaintiff's First Set of Interrogatories**

Defendant proposes to offer into evidence Defendant's Answer to Plaintiff's Interrogatory Nos. 2, 3, 4, 5, 6, 7, 8, 9, 10, and 16.

**OBJECTION:** Plaintiff objects to the relevancy of Defendant's Answer to Plaintiff's Interrogatory Nos. 2, 3, 4, 5, 6, 7, 8, 9, 10, and 16.

### **C. Defendant's Supplemental Answers to Plaintiff's First Set of Interrogatories**

Defendant proposes to offer into evidence Defendant's Supplemental Answer to Plaintiff's Interrogatory Nos. 2, 3, 4, 5, 6, 8, 9, 11, 15.

**OBJECTION:** Plaintiff objects to the relevancy of Defendant's Supplemental Answer to Plaintiff's Interrogatory Nos. 2, 3, 4, 5, 6, 8, 9, 11, and 15.

Furthermore, Plaintiff reserves the right to assert additional grounds for objection depending upon the use of any discovery materials at trial.

Respectfully submitted,

**LEWIS, RICE & FINGERSH, L.C.**

By:         /s/ Frank B. Janoski          
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ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I further certify that on the 9th day of January, 2009, the foregoing was filed with the Clerk of Court to be served via the Court's ECF system upon all counsel of record.

        /s/ Frank B. Janoski          
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