

**EXHIBIT A:  
PLAINTIFFS' OBJECTIONS TO DEFENDANT'S  
COUNTER EXHIBIT LIST**

## **LEGEND OF OBJECTIONS**

- “A” - Lack of authenticity, FED. R. EVID. 901.
- “B” - Not the best evidence, FED. R. EVID. 1002-1004 & 1006.
- “C” - Cumulative, FED. R. EVID. 402 & 403.
- “CO” - Late-added exhibit in violation of the Court’s Order(s).
- “D” - Subject to a filed/anticipated *Daubert* motion or motion to exclude.
- “Dup.” - Duplicative.
- “H” - Hearsay, FED. R. EVID. 801-803.
- “I” - Incomplete (*necessary additional testimony noted*), FED. R. EVID. 106.
- “IO” - Improper opinion testimony from lay witness, FED. R. EVID. 701 & 702.
- “III” - Illegible.
- “LF” - Lack of foundation or lack of personal knowledge, FED. R. EVID. 602.
- “LS” - Lack scientific reliability, FED. R. EVID. 702 & 703.
- “M” - Multiple documents.
- “ML” - Subject to a filed/anticipated Motion in Limine.
- “MSJ” - Subject to a filed/anticipated Motion for (Partial) Summary Judgment.
- “NI” - Not properly identified on Defendant’s trial exhibit list.
- “NR” - Not Relevant, FED. R. EVID. 402.
- “P” - Physical exhibit to which Plaintiffs reserve right to object following exchange of same in accordance with agreement among the parties.
- “Priv.” - Privileged/attorney work-product.
- “PV” - Probative value substantially outweighed by danger of unfair prejudice; confusion of issues; waste of time; considerations of undue delay; misleading nature of exhibit or testimony; needless presentation of cumulative evidence, FED. R. EVID. 402 & 403.
- “T” - Not timely produced.
- “408” - Offer of settlement/settlement negotiations, FED. R. EVID. 408.

GN 011947-49	no obj
GN 015842-46	no obj
GN 049824-26	CO, LF, H
GN 012251-83	CO, LF, H
GN 141804-11	CO, LF, H
GN 327868-71	CO, LF, H
GN 299329-691	CO, ML, NR, PV
GN 555861-6208	CO, T, ML, NR, PV
GN 556303-16	CO, I*, NI, H