

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

ERIC M. ALBRITTON

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v.

C. A. NO. 6:08-CV-00089

CISCO SYSTEMS, INC.,  
RICK FRENKEL, MALLUN YEN &  
JOHN NOH

**DEFENDANTS' AMENDED OBJECTIONS TO PLAINTIFF'S  
DEPOSITION DESIGNATIONS AND CROSS-DESIGNATIONS**

**FOR RULINGS PRIOR TO TRIAL**

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Mallun Yen	27:1-5	Irrelevant and immaterial under Fed. R. Evid. 402.
Mallun Yen	36:5-41:11	Irrelevant and immaterial under Fed. R. Evid. 402.
Mallun Yen	36:24-25	Speculation.
Mallun Yen	39:1-2	Argumentative.
Mallun Yen	39:7-10	Argumentative. Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	39:14	Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	45:18-20	Speculation. Irrelevant and immaterial under Fed. R. Evid. 402. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	63:15-64:4	Irrelevant and immaterial under Fed. R. Evid. 402.
Mallun Yen	74:24-75:2	Speculation. Hearsay. Fed. R. Evid. 802.
Mallun Yen	79:13-21	Argumentative. Compound.
Mallun Yen	84:7-11	Argumentative. Question misstates the blog.
Mallun Yen	84:20-25	Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	86:5-11	Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.



<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Mallun Yen	86:13-18	Argumentative. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	87:2-88:6	Privileged. Attorney client. Work Product.
Mallun Yen	87:6-88:7	Objections and instructions to the witness not to be read to the jury.
Mallun Yen	91:11-18	Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	91:20-92:4	Argumentative. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	92:20-22	Argumentative. Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703. Asked and answered.
Mallun Yen	93:3-12	Privileged. Attorney client. Work Product.
Mallun Yen	93:13-15	Argumentative. Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	93:22	Argumentative. Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	94:2-3	Argumentative.
Mallun Yen	94:7-11	Argumentative. Speculation.
Mallun Yen	94:18-22	Privileged. Attorney client. Work Product.
Mallun Yen	94:23-95:1	Sidebar
Mallun Yen	95:7-10	Seeks privileged information.
Mallun Yen	95:22-24	Hearsay. Fed. R. Evid. 802. Facts not in evidence. Privileged. Attorney client. Work Product.
Mallun Yen	96: 12-20	Argumentative. Privileged. Attorney Client. Work Product.
Mallun Yen	101:21-102:2	Argumentative.
Mallun Yen	102:4-11	Argumentative. Abusive. Misstates the Federal and local rules.
Mallun Yen	109:15-16	Misstates the document.
Mallun Yen	109:21-22	Sidebar
Mallun Yen	110:9-10	Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	111:11-12	Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	111:19-21	Interrupted the witnesses answer. Argumentative. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Mallun Yen	112:9-10	Argumentative.
Mallun Yen	112:16-17	Argumentative. Speculation.
Mallun Yen	113:1-3	Argumentative.
Mallun Yen	113:7-8	Argumentative.
Mallun Yen	113:13	Argumentative. Speculation.
Mallun Yen	114:20-21	Misstates the witnesses testimony.
Mallun Yen	115:4-6	Speculation.
Mallun Yen	115:14-16	Irrelevant. Speculation. Improper predicate for opinion testimony
Mallun Yen	115:25	Speculation.
Mallun Yen	116:13-22	Speculation. Improper predicate for opinion testimony. Multifarious.
Mallun Yen	117:2-3	Argumentative. Irrelevant and immaterial under Fed. R. Evid. 402.
Mallun Yen	117:9-11	Argumentative. Irrelevant and immaterial under Fed. R. Evid. 402.
Mallun Yen	117:17-20	Argumentative. Irrelevant and immaterial under Fed. R. Evid. 402.
Mallun Yen	118:1-2	Argumentative. Speculation. Irrelevant and immaterial under Fed. R. Evid. 402.
Mallun Yen	118:9-10 and 13	Argumentative. Speculation. Irrelevant and immaterial under Fed. R. Evid. 402.
Mallun Yen	121:14-17	Misstates the local rules and the federal rules.
Mallun Yen	124:10-12	Misstates the facts on the document. Speculation.
Mallun Yen	126:2-9	Speculation. Argumentative. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	126:21-24	Argumentative. Assumes facts not in evidence.
Mallun Yen	127:3	Argumentative. Misstates facts. Speculation.
Mallun Yen	127:7-10	Argumentative. Misstates facts. Speculation.
Mallun Yen	127:13	Argumentative. Misstates facts. Speculation.
Mallun Yen	179:15-23	Privileged pursuant to the protective order.
Mallun Yen	179:24-180:4	Argumentative. Misstates facts.
Mallun Yen	180:-7-8	Argumentative. Misstates facts.
Mallun Yen	181:22-182:3	Argumentative. Misstates facts.
Mallun Yen	182:8-11	Argumentative. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	182:15	Argumentative. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Mallun Yen	182:23-24	Argumentative. Irrelevant and immaterial under Fed. R. Evid. 402. Improper character evidence. Fed. R. Evid. 404.
Mallun Yen	183:4-7	Argumentative. Irrelevant and immaterial under Fed. R. Evid. 402. Improper character evidence. Fed. R. Evid. 404.
Mallun Yen	184:4-5	Argumentative. Speculative.
Mallun Yen	184:17-18	Vague, ambiguous and nonsensical. Argumentative.
Mallun Yen	185:12-14	Argumentative. Misstates facts.
Mallun Yen	185:18	The offer is not in question/answer format; the designation ends with a question with no answer.
Mallun Yen	187:3-190:23	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	187:11-13	Argumentative. Misstates facts. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	187:21-24	Privileged. Attorney Client. Work Product.
Mallun Yen	188:17-189:23	Privileged pursuant to the protective order.
Mallun Yen	189:24-25	Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	190:5-6	Argumentative. Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	190:14-23	Privileged pursuant to the protective order.
Mallun Yen	191:15-192:5	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	193:8-194:3	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	193:13-21	Argumentative.
Mallun Yen	195:5-14	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	196:10-13	Argumentative. Speculative. Irrelevant and immaterial under Fed. R. Evid. 402.
Mallun Yen	196:14	Objections not to be read to the jury.
Mallun Yen	196:11-13	Argumentative. Speculative. Irrelevant and immaterial under Fed. R. Evid. 402.
Mallun Yen	196:15-17	Argumentative. Speculative. Irrelevant and immaterial under Fed. R. Evid. 402.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Mallun Yen	197:16-202:2	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	198:8-13	Compound. Speculative. Misstates facts.
Mallun Yen	198:16	Argumentative.
Mallun Yen	199:3-10	Argumentative. Speculation. Misstates facts.
Mallun Yen	199:17-19	Argumentative. Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	200:5-7	Compound. Argumentative. Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	200:23-24	Argumentative. Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Mallun Yen	201:13-15	Speculation. Argumentative.
Mallun Yen	202:1-2	Speculation. Argumentative.
Mallun Yen	207:3-18	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	208:8-209:2	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	209:13-210:2	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	209:13-17	Argumentative.
Mallun Yen	212: 15-19	Compound. Misstates facts. Argumentative.
Mallun Yen	212:23-213:15	Privileged. Attorney Client.
Mallun Yen	213:18-23	Privileged. Attorney Client.
Mallun Yen	216:24-222:3	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	218:25-219:2	Argumentative.
Mallun Yen	222:12-228:4	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	229:4-230:6	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	229:21-230:2	Speculation. Argumentative.
Mallun Yen	231:4-18	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Mallun Yen	231:4-6	Argumentative. Speculation.
Mallun Yen	231:12-13	Argumentative. Misstates facts.
Mallun Yen	241:19-242:16	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	247:7-8	Argumentative. Speculation.
Mallun Yen	249:18-251:18	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	249:25-250:1	Speculation.
Mallun Yen	257:9-16	Privileged pursuant to the protective order.
Mallun Yen	186:22-190:23	Testimony concerning privileged document CISCO PRIVILEGED 000014-16 (Mallun Depo Ex. 11) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	191:15-192:5	Testimony concerning privileged document CISCO PRIVILEGED 000014-16 (Mallun Depo Ex. 11) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	193:8-194:3	Testimony concerning privileged document CISCO PRIVILEGED 000014-16 (Mallun Depo Ex. 11) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	195:5-14	Testimony concerning privileged document CISCO PRIVILEGED 000014-16 (Mallun Depo Ex. 11) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	196:11-21	Testimony concerning privileged document CISCO PRIVILEGED 000014-16 (Mallun Depo Ex. 11) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	197:16-202:16	Testimony concerning privileged document CISCO PRIVILEGED 000014-16 (Mallun Depo Ex. 11) is highly confidential pursuant to the protective order and should not be used in open court.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Mallun Yen	203:23-206:1	Testimony concerning privileged document CISCO PRIVILEGED 000014-16 (Mallun Depo Ex. 11) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	207:1-18	Testimony concerning privileged document CISCO PRIVILEGED 000014-16 (Mallun Depo Ex. 11) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	208:8-209:2	Testimony concerning privileged document CISCO PRIVILEGED 000014-16 (Mallun Depo Ex. 11) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	209:13-210:2	Testimony concerning privileged document CISCO PRIVILEGED 000014-16 (Mallun Depo Ex. 11) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	210:17-213:15	Testimony concerning privileged document CISCO PRIVILEGED 000014-16 (Mallun Depo Ex. 11) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	213:18-214:4	Testimony concerning privileged document CISCO PRIVILEGED 000014-16 (Mallun Depo Ex. 11) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	214:8-19	Testimony concerning privileged document CISCO PRIVILEGED 000014-16 (Mallun Depo Ex. 11) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	216:24-222:3	Testimony concerning privileged document CISCO PRIVILEGED 000122-125 (Mallun Depo Ex. 13) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	222:12-223:3	Testimony concerning privileged document CISCO PRIVILEGED 000146-149 (Mallun Depo Ex. 14) is highly confidential pursuant to the protective order and should not be used in open court.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Mallun Yen	229:4-230:6	Testimony concerning privileged document CISCO PRIVILEGED 000146-149 (Mallun Depo Ex. 14) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	230:17-19	Testimony concerning privileged document CISCO PRIVILEGED 000146-149 (Mallun Depo Ex. 14) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	231:4-18	Testimony concerning privileged document CISCO PRIVILEGED 000146-149 (Mallun Depo Ex. 14) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	232:17-233:5	Testimony concerning privileged document CISCO PRIVILEGED 000146-149 (Mallun Depo Ex. 14) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	233:23-234:23	Testimony concerning privileged document CISCO PRIVILEGED 000146-149 (Mallun Depo Ex. 14) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	249:18-255:4	Testimony concerning privileged document CISCO PRIVILEGED 000269-272 (Mallun Depo Ex. 18) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	255:12-24	Testimony concerning privileged document CISCO PRIVILEGED 000269-272 (Mallun Depo Ex. 18) is highly confidential pursuant to the protective order and should not be used in open court.
Mallun Yen	257:9-24	Testimony concerning privileged document CISCO PRIVILEGED 000269-272 (Mallun Depo Ex. 18) is highly confidential pursuant to the protective order and should not be used in open court.



<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Marta Beckwith	10:17-18	Speculation
Marta Beckwith	11:12-13	Speculation. Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702.
Marta Beckwith	16:17	Sidebar
Marta Beckwith	16:24-17:1	Misstates the facts, speculation, hearsay
Marta Beckwith	18:14-16	Privilege Fed. R. Evid. 501 and 502
Marta Beckwith	20:11-12	Irrelevant and immaterial under Fed. R. Evid. 402. Argumentative.
Marta Beckwith	22:2-4	Speculation; no personal knowledge
Marta Beckwith	22:11-13	Hearsay, lack of personal knowledge
Marta Beckwith	23:20-22	Argumentative, Improper opinion testimony
Marta Beckwith	24:2-3	Argumentative, Improper opinion testimony, Irrelevant and immaterial under Fed. R. Evid. 402.
Marta Beckwith	24:8-10	Argumentative, Improper opinion testimony, Irrelevant and immaterial under Fed. R. Evid. 402. Misstates the facts.
Marta Beckwith	25:6-7	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702. Argumentative, , Irrelevant and immaterial under Fed. R. Evid. 402. Misstates the facts.
Marta Beckwith	25:10-13	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702. Argumentative, Irrelevant and immaterial under Fed. R. Evid. 402. Misstates the facts.
Marta Beckwith	25:16-19	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702. Argumentative, Irrelevant and immaterial under Fed. R. Evid. 402. Misstates the facts.
Marta Beckwith	26:7-9	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702. Argumentative, Irrelevant and immaterial under Fed. R. Evid. 402. Misstates the facts. Lack of personal knowledge.
Marta Beckwith	27:14-15	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Marta Beckwith	27:21	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702.
Marta Beckwith	28:3-5	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702.
Marta Beckwith	28:9-11	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702.
Marta Beckwith	28:21-23	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702.
Marta Beckwith	29:1-3	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702. Argumentative,
Marta Beckwith	29:8-10	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702. Irrelevant and immaterial under Fed. R. Evid. 402. Argumentative,
Marta Beckwith	29:13-14	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702.
Marta Beckwith	29:19-21	Speculation
Marta Beckwith	30:4-8	Compound question. Misstates the facts. Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702.
Marta Beckwith	30:23	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702. Irrelevant and immaterial under Fed. R. Evid. 402. Argumentative.
Marta Beckwith	32:19-21	Hearsay, Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702. Speculation, Lack of personal knowledge.
Marta Beckwith	23:25-24:1	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702.
Marta Beckwith	34: 7-8	Argumentative
Marta Beckwith	35:1-12	Irrelevant and immaterial under Fed. R. Evid. 402. Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702. Speculation
Marta Beckwith	37:15-16	Hearsay,

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Marta Beckwith	41:3-4	Hearsay, Speculation, Lack of personal knowledge.
Marta Beckwith	41:11-12	Speculation, Lack of personal knowledge. Irrelevant and immaterial under Fed. R. Evid. 402.
Marta Beckwith	46:25-47:1	Speculation
Marta Beckwith	50:18-53:10	Testimony concerning privileged documents is highly confidential pursuant to the protective order and should not be used in open court. This testimony refers to Cisco.Privilege.000269-272. Defendant incorporates its objections to the exhibit.
Marta Beckwith	51:2	Sidebar
Marta Beckwith	52:3-5	Question that was later re-asked not response based on objections.
Marta Beckwith	52:17-53:4	Sidebar
Marta Beckwith	58:13-16	Argumentative, Irrelevant and immaterial under Fed. R. Evid. 402.
Marta Beckwith	58:21-23	Irrelevant and immaterial under Fed. R. Evid. 402. Argumentative,
Marta Beckwith	59:1-25	Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
Marta Beckwith	60:12-62:20	Irrelevant and immaterial under Fed. R. Evid. 402. Hearsay
Marta Beckwith	63:8-9	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702.
Marta Beckwith	63:14-16 and 18	Speculation, Lack of personal knowledge.
Marta Beckwith	65:15	Irrelevant and immaterial under Fed. R. Evid. 402. Argumentative,
Marta Beckwith	66:2-3	Irrelevant and immaterial under Fed. R. Evid. 402. Argumentative,
Marta Beckwith	67:9-10; 68:19-72:24	Testimony concerning privileged documents is highly confidential pursuant to the protective order and should not be used in open court. This testimony refers to Cisco.Privilege.000027 Defendant incorporates its objections to the exhibit.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Marta Beckwith	68:19-970:25	Hearsay, Irrelevant and immaterial under Fed. R. Evid. 402. Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702. Speculation, Lack of personal knowledge.
Marta Beckwith	70:13-17	Compound question
Marta Beckwith	71:1	Privileged attorney client/work product.
Marta Beckwith	71:5-7	Instruction to the witness not to be read to the jury.
Marta Beckwith	71:8-72:6	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702. Speculation
Marta Beckwith	72:13-16, 19-20	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702. Argumentative, Speculation
Marta Beckwith	88:18-89:9	Testimony concerning privileged documents is highly confidential pursuant to the protective order and should not be used in open court. This testimony refers to Cisco.Privilege.000094 Defendant incorporates its objections to the exhibit.
Marta Beckwith	88:18-89:9	Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
John Noh	17:16-17 and 20	Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
John Noh	29:7-9	Speculation
John Noh	38:19-20	Speculation.
John Noh	40:22-25	Irrelevant and immaterial under Fed. R. Evid. 402.
John Noh	43:10-13 and 16	Argumentative; Improper opinion testimony (FRE 701)
John Noh	44:19	Argumentative, Speculation
John Noh	60:18-23	Argumentative.. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
John Noh	101:12-102:22	Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403. Improper character evidence Fed. R. 404. Improper opinion testimony Fed. R. 701.
John Noh	103:1-25	Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403. Improper character evidence Fed. R. 404. Improper opinion testimony Fed. R. 701.
John Noh	103:1-3	Speculation, Argumentative
John Noh	106:12-13	Argumentative; Irrelevant and immaterial under Fed. R. Evid. 402.
John Noh	107:19-20	Argumentative; Irrelevant and immaterial under Fed. R. Evid. 402.
John Noh	107:25-108-1	Argumentative; Irrelevant and immaterial under Fed. R. Evid. 402. Improper opinion testimony.
John Noh	108:6-7	Argumentative; Irrelevant and immaterial under Fed. R. Evid. 402. Improper opinion testimony.
John Noh	108:12-13	Argumentative; Irrelevant and immaterial under Fed. R. Evid. 402. Improper opinion testimony.
John Noh	108:18	Argumentative; Irrelevant and immaterial under Fed. R. Evid. 402. Improper opinion testimony.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
John Noh	111:3-5	Argumentative; Irrelevant and immaterial under Fed. R. Evid. 402. Improper opinion testimony.
John Noh	121:21-23	Speculation.
John Noh	124:4-126:14	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
John Noh	124:17-125:9	Lack of personal knowledge, improper opinion testimony.
John Noh	126:21-24	Testimony has been designated as highly confidential pursuant to the protective order and should not be used in open court.
John Noh	128:18-21	Speculation
John Noh	141:9-12	Argumentative, speculation
John Noh	141:17-18	Argumentative, Irrelevant and immaterial under Fed. R. Evid. 402.
John Noh	118:14-122:7	Testimony concerning privileged document CISCO PRIVILEGED 000012 and 000015 (Noh Depo Ex. 15) is highly confidential pursuant to the protective order and should not be used in open court.
John Noh	124:4-126:14	Testimony concerning privileged document CISCO PRIVILEGED 000014-16 (Noh Depo Ex. 16) is highly confidential pursuant to the protective order and should not be used in open court.
John Noh	126:21-24	Testimony concerning privileged document CISCO PRIVILEGED 000011-13 (Noh Depo Ex. 17) is highly confidential pursuant to the protective order and should not be used in open court.
John Noh	127:12-129:2	Testimony concerning privileged document CISCO PRIVILEGED 000011-13 (Noh Depo Ex. 17) is highly confidential pursuant to the protective order and should not be used in open court.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Mark Chandler	34:11-12	Speculation.
Mark Chandler	36:7-9	Argumentative. Speculation.
Mark Chandler	77:8-10	Argumentative. Speculation.
Mark Chandler	88:16-91:18	Irrelevant and immaterial under Fed. R. Evid. 402.
Mark Chandler	91:23-24	Privileged
Mark Chandler	91:25-92:11	Counsel's instruction to witness and sidebar.
Mark Chandler	96:18-21	Argumentative.
Mark Chandler	97:2-5	Argumentative. Misstates facts.
Mark Chandler	97:22-24	Argumentative. Speculation.

**NO PRETRIAL RULING REQUIRED**

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
David Maland	16:11-13	Offer does not include a question.
David Maland	23:6-9	The offer is not in question/answer format the designation does not include a question and only includes part of the witnesses answer.
David Maland	36:8-37:6	The offer is not in question/answer format the designation does not start with a question and begins in the middle of an answer.
David Maland	39:6	Side bar not a question or answer.
David Maland	39:13-39:22	Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland	42:3-9	Sidebar. Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland	48:8-14	The offer is not in question/answer format; the designation does not include a question.
David Maland	49:13-50:11	Hearsay. Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland	55:14-15	Sidebar. Irrelevant and immaterial under Fed. R. Evid. 402
David Maland	59:8-14	The offer is not in question/answer format; the designation does not start with a question and only includes part of an answer.
David Maland	59:15	Sidebar. Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland	61:15-23	Offer does not include a question.
David Maland	66:13-15	The offer is not in question/answer format; the designation is only a question without any answer.
David Maland	68:11-16	Nonresponsive
David Maland	76:21-78:2	The offer is not in question/answer format; the designation does not include a question. Hearsay.
David Maland	84:1-5	The offer is not in question/answer format the designation is only part of an answer.
David Maland	86:16-87:21	The offer is not in question/answer format; the designation does not include any question and only includes part of an answer.
David Maland	92:23-24	The offer is not in question/answer format; the designation does not include any question and only has part of the answer.
David Maland	110:6-111:20	Irrelevant and immaterial under Fed. R. Evid. 402.



<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
David Maland	118:17-119:6	The offer is not in question/answer format; the designation does not include any question.
David Maland	140:1-4	Leading; Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403. Unreliable lay opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702.
David Maland	147:25-148:4	Leading; Speculation
David Maland	152:18-19	Leading. The offer is not in question/answer format; the designation is a question without any answer.
David Maland	154:3-10	The offer is not in question/answer format; the designation is a question without any answer.
David Maland	156:16-24	Nonresponsive
David Maland	159:3-5 and 7	Leading, Speculation
David Maland	160:4-7	Hearsay
David Maland	161:6-11	Misstatement of the facts. Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
David Maland	163:6-15	Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland	163:24-165:13	Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland	165:5-7	The offer is not in question/answer format; the designation is a question without any answer.
David Maland	165:16-20	The offer is not in question/answer format; the designation does not include a question. Further the question above is leading and calls for Specualtion.
David Maland	172:18-173:3	Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
David Maland	175:1-25	Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland	177:12-180:14	Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland	181:5-182:24	Unreliable speculative lay opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702. Irrelevant and immaterial under Fed. R. Evid. 402.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
David Maland	187:21-188:7	Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
David Maland	189:5-191:5	The offer is not in question/answer format; the designation does not include a question. Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland	193:22	Objection not to be read to the jury.
David Maland Cross Designations	11:6-13:2 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403
David Maland Cross Designations	15:20-16:1 (Cross)	Improper cross examination on area not covered in direct. Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403
David Maland Cross Designations	17:13-18:20 (Cross)	Improper cross examination on area not covered in direct. Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403
David Maland Cross Designations	23:1-8 (Cross)	The offer is not in question/answer format; the designation does not include a question and then ends with a question with no answer.
David Maland Cross Designations	27:10-12 (Cross)	The offer is not in question/answer format; the designation does not include a question.
David Maland Cross Designations	34:3-4 (Cross)	The offer is not in question/answer format; the designation does not include a question.
David Maland Cross Designations	38:9 (Cross)	Objection not to be read to the jury.
David Maland Cross Designations	39:4 (Cross)	Objection not to be read to the jury.
David Maland Cross Designation	49:13-50:11 (Cross)	Hearsay. Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland Cross Designations	48:8-50:11 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403. The offer is not in question/answer format; the designation does not start with a question

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
David Maland Cross Designations	51:2-52:25(Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.. The offer is not in question/answer format; the designation does not start with a question.
David Maland Cross Designations	59:8-14 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403. The offer is not in question/answer format; the designation does not start with a question and only includes part of an answer.
David Maland Cross Designations	67:23-68:25 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403
David Maland Cross Designations	70:6-71:8 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403. The offer is not in question/answer format; the designation does not start with a question.
David Maland Cross Designations	77:1-78:2 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403. The offer is not in question/answer format; the designation does not include a question.
David Maland Cross Designations	82:15-83:5 (Cross)	The offer is not in question/answer format; the designation does not include a question. Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland Cross Designations	84:1-9 (Cross)	The offer is not in question/answer format the designation is an answer.
David Maland Cross Designations	84:25-85:12 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403
David Maland Cross Designations	86:16-87:21 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403
David Maland Cross Designations	89:12-19 (Cross)	The offer is not in question/answer format the designation is only part of an answer. Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland Cross Designations	89:20-92:8 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
David Maland Cross Designations	92:9-93:23 (Cross)	Irrelevant and immaterial under Fed. R. Evid. 402. Hearsay.
David Maland Cross Designations	94:11-12 (Cross)	The offer is not in question/answer format the designation is an answer.
David Maland Cross Designations	94:13-17 (Cross)	Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
David Maland Cross Designations	96:17-96:25 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403
David Maland Cross Designations	100:1-19 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403
David Maland Cross Designations	100:21-101:25 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403 The offer is not in question/answer format the designation is an answer.
David Maland Cross Designations	108:3-109:5 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403
David Maland Cross Designations	110:6-111:20 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403. Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland Cross Designations	111:21-112:3 (Cross)	Irrelevant and immaterial under Fed. R. Evid. 402. Cumulative under Fed. R. Evid 403
David Maland Cross Designations	112:14-24 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403
David Maland Cross Designations	114:14-19 (Cross)	Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland Cross Designations	116:2 (Cross)	The offer is not in question/answer format the designation is only two words of an answer.
David Maland Cross Designations	122:10-16 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	122:24-123:13 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
David Maland Cross Designations	126:20-127:17 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	129:6-130:19 (Cross)	Improper cross examination on area not covered in direct. Objection should not be read to the jury. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	135:23-140:8 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	142:3-142:19 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	143:3-145:5 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	146:5-148:4 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	148:6-13 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	149:7-18 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	149:21-150:17; 150:24-152:19 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	152:18-19 (Cross)	Leading. The offer is not in question/answer format; the designation is a question without any answer.
David Maland Cross Designations	152:22-153:25 (Cross)	Cumulative under Fed. R. Evid 403. The offer is not in question/answer format; the designation does not include a question
David Maland Cross Designations	155:21-156:24 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	157:3-161:11 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	160:4-7 (Cross)	Hearsay

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
David Maland Cross Designations	162:6-165:6 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403
David Maland Cross Designations	165:8-9 (Cross)	Leading and Speculation.
David Maland Cross Designations	163:6-15 (Cross)	Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland Cross Designations	163:24-165:13 (Cross)	Irrelevant and immaterial under Fed. R. Evid. 402.
David Maland Cross Designations	165:13-14 (Cross)	Leading. Speculation.
David Maland Cross Designations	165:16-20 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	168:12-175:25 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	176:12-180:14 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	181:5-182:24 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	183:9-24 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	187:8-16 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	187:21-188:1 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	189:5-191:5 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	192:10-193:14 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	199:9-21 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Maland Cross Designations	199:25-200:19 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
David Maland Cross Designations	200:21-23 (Cross)	Already included in Plaintiff's Designation of David Maland Deposition Testimony. Cumulative under Fed. R. Evid 403. The offer is not in question/answer format; the designation does not include a question

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Cynthia Paar	6:5-5	Optional completeness to avoid confusion.
Cynthia Paar	6:15-24	Optional completeness to avoid confusion.
Cynthia Paar	7:19-21	Optional completeness to avoid confusion.
Cynthia Paar	8:9-9:1	Optional completeness to avoid confusion.
Cynthia Paar	10:12-22	Optional completeness to avoid confusion.
Cynthia Paar	16:25	Objection not to be read to the jury.
Cynthia Paar	17:9-12	Leading
Cynthia Paar	17:13-14	Objection not to be read to the jury.
Cynthia Paar	17:15-16	Irrelevant and immaterial under Fed. R. Evid. 402.
Cynthia Paar	18:7-9-10	Leading. Speculation
Cynthia Paar	19:9	Leading. Speculation
Cynthia Paar	19:13-15	Leading
Cynthia Paar	19:17-19	Leading
Cynthia Paar	19:22-25	Leading.
Cynthia Paar	20:2-8	Leading.
Cynthia Paar	20: 15-18	Compound. Speculation. Lack of foundation for lay opinion testimony. Fed. R. Evid. 701.
Cynthia Paar	20:19-21	Compound. Speculation. Lack of foundation for lay opinion testimony. Fed. R. Evid. 701.
Cynthia Paar	20:24-21:2	Compound. Speculation. Lack of foundation for lay opinion testimony. Fed. R. Evid. 701.
Cynthia Paar	21:3-5	Leading. Compound. Speculation. Lack of foundation for lay opinion testimony. Fed. R. Evid. 701.
Cynthia Paar	23:15-18	Leading
Cynthia Paar	24: 2-8	Leading. Speculation. Lack of foundation for lay opinion testimony. Fed. R. Evid. 701.
Cynthia Paar	24:5-6	Objection not to be read to the jury.
Cynthia Paar	24:18-20	Leading. Speculation. Lack of foundation for lay opinion testimony. Fed. R. Evid. 701.
Cynthia Paar	24: 21 and 23	Objections not to be read to the jury.
Cynthia Paar	28:13-175	Leading
Cynthia Paar	28:16	Objection not to be read to the jury.
Cynthia Paar	28:21	Sidebar
Cynthia Paar Cross Designations	8:1 (Cross)	The offer is not in question/answer format; the designation does not include a question.
Cynthia Paar Cross Designations	15:25-16:24 (Cross)	Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	15:20-16:1 (Cross)	Leading



<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Cynthia Paar Cross Designations	17:1-17 (Cross)	Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	17:9-12 (Cross)	Leading.
Cynthia Paar Cross Designations	17:15-18:2 (Cross)	Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	18:7-9 (Cross)	Leading. Speculation. Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	19:9-10 (Cross)	Leading. Speculation. Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	19:13-15 (Cross)	Leading. Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	19:17-19 (Cross)	Leading. Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	19:22-25 (Cross)	Leading. Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	20:2-5 (Cross)	Leading. Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	20: 15-18 (Cross)	Compound. Speculation. Lack of foundation for lay opinion testimony. Fed. R. Evid. 701. Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	20:19-22 (Cross)	Compound. Speculation. Lack of foundation for lay opinion testimony. Fed. R. Evid. 701. Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Cynthia Paar Cross Designations	20:24-21:2 (Cross)	Compound. Speculation. Lack of foundation for lay opinion testimony. Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	21:3-5 (Cross)	Compound. Leading. Speculation. Lack of foundation for lay opinion testimony. Fed. R. Evid. 701. Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	23:15-18 (Cross)	Leading. Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	25:6-19 (Cross)	Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	27:25-28:15 (Cross)	Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	28:13-17 (Cross)	Leading
Cynthia Paar Cross Designations	28:17-21 (Cross)	Already included in Plaintiff's Designation of Cynthia Paar Deposition Testimony. Cumulative under Fed. R. Evid 403.
Cynthia Paar Cross Designations	28:21 (Cross)	Sidebar

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Peggy Thompson	8:20-9:11	Optional completeness to avoid confusion.
Peggy Thompson	10:9-11:12	Optional completeness to avoid confusion.
Peggy Thompson	15:21-16:11	Optional completeness to avoid confusion.
Peggy Thompson	19:16-20:4	Optional completeness to avoid confusion.
Peggy Thompson	24:24-25:3	Leading.
Peggy Thompson	25:4-7	Leading
Peggy Thompson	25:14-18	Leading. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
Peggy Thompson	25:3	Objection not to be read to the jury.
Peggy Thompson	25:6	Objection not to be read to the jury.
Peggy Thompson	25:16-17	Objection not to be read to the jury.
Peggy Thompson	26:2-7	Leading.
Peggy Thompson	26:5	Objection not to be read to the jury.
Peggy Thompson	26:22-25	Leading. Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701.
Peggy Thompson	26:24	Objection not to be read to the jury.
Peggy Thompson	27:5-6	Leading.
Peggy Thompson	27:7-11	Leading.
Peggy Thompson	27:9-10	Objections not to be read to the jury.
Peggy Thompson	27:18	Sidebar

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Rhonda Lafitte	24:4	Sidebar
Rhonda Lafitte Cross Designations	16:11-12 (Cross)	Irrelevant and immaterial under Fed. R. Evid. 402.
Rhonda Lafitte Cross Designations	17:22-18:1 (Cross)	Irrelevant and immaterial under Fed. R. Evid. 402.
Rhonda Lafitte Cross Designations	18:6-24 (Cross)	Irrelevant and immaterial under Fed. R. Evid. 402.
Rhonda Lafitte Cross Designations	22:24-23: 4 (Cross)	Already included in Plaintiff's Designation of Rhonda Lafitte Deposition Testimony. Cumulative under Fed. R. Evid 403.
Rhonda Lafitte Cross Designations	23:12-14 (Cross)	Already included in Plaintiff's Designation of Rhonda Lafitte Deposition Testimony. Cumulative under Fed. R. Evid 403.
Rhonda Lafitte Cross Designations	23:8-24:4 (Cross)	Already included in Plaintiff's Designation of Rhonda Lafitte Deposition Testimony. Cumulative under Fed. R. Evid 403.
Rhonda Lafitte Cross Designations	23:24-24:3 (Cross)	Already included in Plaintiff's Designation of Rhonda Lafitte Deposition Testimony. Cumulative under Fed. R. Evid 403.
Rhonda Lafitte Cross Designations	24:4 (Cross)	Already included in Plaintiff's Designation of Rhonda Lafitte Deposition Testimony. Cumulative under Fed. R. Evid 403. Sidebar.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
David Provines	13:21-14:3	Optional completeness to avoid confusion.
David Provines	23:15-25:2	Optional completeness to avoid confusion.
David Provines	29:12-15	Offer does not include a question.
David Provines	29:25-30:8	Optional completeness to avoid confusion.
David Provines	30:9-31:9	Optional completeness to avoid confusion.
David Provines	32:1-32:5	Leading
David Provines	32:5	Objection not to be read to the jury.
David Provines	32:6-7	Leading
David Provines	32: 8-10	Objections not to be read to the jury.
David Provines	35:16-18	Leading. The offer is not in question/answer format; the designation is a question without any answer.
David Provines	36:6-9	Leading. Improper predicate for lay opinion testimony. Fed. R. Evid. 701.
David Provines	36:10-11	Objections not to be read to the jury.
David Provines	36:12-20	Leading
David Provines	37:3-13	Leading
David Provines	38:2-14	Optional completeness to avoid confusion.
David Provines	37:7-8	Objections not to be read to the jury.
David Provines	38:15-40:9	Improper predicate for lay opinion testimony. Fed. R. Evid. 701.
David Provines	41:2-5	Leading. Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701.
David Provines	42:10	Leading. Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701.
David Provines	42:11-12	Objections not to be read to the jury.
David Provines	43:13	Leading. Speculation. Improper predicate for lay opinion testimony. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
David Provines	43:14-15	Objections not to be read to the jury.
David Provines	43:17-18	Leading. Improper predicate for lay opinion testimony. Fed. R. Evid. 701.
David Provines	43:19-20	Objections not to be read to the jury.
David Provines	43:22-24	Leading. Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701.
David Provines	43:24-44:1	Objections not to be read to the jury.
David Provines	44:3-7	Leading.
David Provines	44:8-13	Leading. Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701.
David Provines	44:11-12	Objections not to be read to the jury.
David Provines	44:16-21	Leading. Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
David Provines	44:19-20	Objections not to be read to the jury.
David Provines	44:22-24	Leading
David Provines	44:25-45:1	Objections not to be read to the jury.
David Provines	45:2-5	Leading. Speculation.
David Provines	45:4	Objection not to be read to the jury.
David Provines	45:6-16	Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701. Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
David Provines	45:8-9	Objection not to be read to the jury.
David Provines	45:17-18	Leading. Speculation. Improper predicate for lay opinion testimony. Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403. The offer is not in question/answer format; the designation is a question without any answer.
David Provines	46:3-6	Leading. Speculation. Argumentative. Improper predicate for lay opinion testimony. Fed. R. Evid. 701. The offer is not in question/answer format; the designation is a question without any answer.
David Provines	46:6-7	Objections not to be read to the jury.
David Provines	46:16	Leading. Argumentative. Improper predicate for lay opinion testimony. Fed. R. Evid. 701. Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
David Provines	46:21-22	Leading. Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701.
David Provines	46:23	Objection not to be read to the jury.
David Provines	46:25-47:3	Leading. Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701.
David Provines	47: 4-7	Objections not to be read to the jury.
David Provines	49:2-4	Sidebar.
David Provines Cross Designations	29:12-24 (Cross)	Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	31:13-33:25 (Cross)	Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
David Provines Cross Designations	34:12-17 (Cross)	Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	36:6-9 (Cross)	Leading. Improper predicate for lay opinion testimony. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	36:12-20 (Cross)	Leading. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	36:21-25 (Cross)	Irrelevant and immaterial under Fed. R. Evid. 402. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	37:3-6 (Cross)	Leading. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	36:17-37:6 (Cross)	Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	37:9-20 (Cross)	Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	38:15-40:9 (Cross)	Improper predicate for lay opinion testimony. Fed. R. Evid. 701. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403. The offer is not in question/answer format; the designation ends in only part of a question.
David Provines Cross Designations	41:2-5 (Cross)	Leading. Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701.
David Provines Cross Designations	41:23-45:18 (Cross)	Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	42:10 (Cross)	Leading. Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
David Provines Cross Designations	42:11-12 (Cross)	Objections not to be read to the jury.
David Provines Cross Designations	43:13 (Cross)	Leading. Speculation. Improper predicate for lay opinion testimony. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	43:14-15 (Cross)	Objections not to be read to the jury.
David Provines Cross Designations	43:17-18	Leading. Improper predicate for lay opinion testimony. Fed. R. Evid. 701. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	43:19-20 (Cross)	Objections not to be read to the jury.
David Provines Cross Designations	43:22-44:2 (Cross)	Leading. Speculation. Improper predicate for lay opinion testimony. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	43:24-44:1 (Cross)	Objections not to be read to the jury.
David Provines Cross Designations	44:3-7 (Cross)	Leading. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	44:8-13 (Cross)	Leading. Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	44:11-12 (Cross)	Objections not to be read to the jury.
David Provines Cross Designations	44:16-21 (Cross)	Leading. Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	44:19-20 (Cross)	Objections not to be read to the jury.



<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
David Provines Cross Designations	44:22-24 (Cross)	Leading. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	44:25-45:1 (Cross)	Objections not to be read to the jury.
David Provines Cross Designations	45:2-5 (Cross)	Leading. Speculation. Irrelevant and immaterial under Fed. R. Evid. 402. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	45:4 (Cross)	Objection not to be read to the jury.
David Provines Cross Designations	45:6-16 (Cross)	Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701. Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.
David Provines Cross Designations	45:8-9 (Cross)	Objection not to be read to the jury.
David Provines Cross Designations	45:17-18 (Cross)	Leading. Speculation. Improper predicate for lay opinion testimony. Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403. The offer is not in question/answer format; the designation is a question without any answer. Already included in Plaintiff's Designation of David Provines Deposition Testimony. Cumulative under Fed. R. Evid 403.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Faye Thompson	12:22-16:5	Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
Faye Thompson	12:25-13:13	Hearsay. Fed. R. Evid. 802.
Faye Thompson	14:12-14	Leading.
Faye Thompson	14:15	Objection not to be read to the jury.
Faye Thompson	14:16	Leading. Speculation
Faye Thompson	14:17	Objection not to be read to the jury.
Faye Thompson	14:19-21	Leading. Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701. Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
Faye Thompson	14:20	Objection not to be read to the jury.
Faye Thompson	14:22	Objection not to be read to the jury.
Faye Thompson	14:23-15:11	Improper predicate for lay opinion testimony. Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403
Faye Thompson	15:10-11	Leading. Improper predicate for lay opinion testimony.
Faye Thompson	15:12-13	Objections not to be read to the jury.
Faye Thompson	15:14-16	Leading
Faye Thompson	15:17-18	Objections not to be read to the jury.
Faye Thompson	15:19-22	Leading
Faye Thompson	15:21	Objection not to be read to the jury.
Faye Thompson	15:23-16:1	Leading. Speculation.
Faye Thompson	15:25	Objection not to be read to the jury
Faye Thompson	16:2	Objection not to be read to the jury.
Faye Thompson Cross designations	12:4-14:14 (Cross)	Already included in Plaintiff's Designation of Fay Thompson Deposition Testimony. Cumulative under Fed. R. Evid 403.
Faye Thompson Cross designations	12:22-16:5 (Cross)	Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403. Already included in Plaintiff's Designation of Fay Thompson Deposition Testimony. Cumulative under Fed. R. Evid 403.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Faye Thompson Cross designations	12:25-13 (Cross)	Hearsay. Fed. R. Evid. 802. Already included in Plaintiff's Designation of Fay Thompson Deposition Testimony. Cumulative under Fed. R. Evid 403.
Faye Thompson Cross designations	14:12-14 (Cross)	Leading. Already included in Plaintiff's Designation of Fay Thompson Deposition Testimony. Cumulative under Fed. R. Evid. 403.
Faye Thompson Cross designations	14:16-14:18 (Cross)	Leading. Speculation. Already included in Plaintiff's Designation of Fay Thompson Deposition Testimony. Cumulative under Fed. R. Evid 403.
Faye Thompson Cross designations	14:19-21 (Cross)	Leading. Speculation. Improper predicate for lay opinion testimony. Fed. R. Evid. 701. Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403. Already included in Plaintiff's Designation of Fay Thompson Deposition Testimony. Cumulative under Fed. R. Evid 403.
Faye Thompson Cross designations	14:23-15:11 (Cross)	Improper predicate for lay opinion testimony. Fed. R. Evid. 701. Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403. Already included in Plaintiff's Designation of Fay Thompson Deposition Testimony. Cumulative under Fed. R. Evid 403.
Faye Thompson Cross designations	15:10-11 (Cross)	Leading. Improper predicate for lay opinion testimony. Fed. R. Evid. 701. Already included in Plaintiff's Designation of Fay Thompson Deposition Testimony. Cumulative under Fed. R. Evid 403.
Faye Thompson Cross designations	15:14-16 (Cross)	Leading. Already included in Plaintiff's Designation of Fay Thompson Deposition Testimony. Cumulative under Fed. R. Evid 403.
Faye Thompson Cross designations	15:19-22 (Cross)	Leading. Already included in Plaintiff's Designation of Fay Thompson Deposition Testimony. Cumulative under Fed. R. Evid 403.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Faye Thompson Cross designations	15:23-16:1 (Cross)	Leading. Speculation. Already included in Plaintiff's Designation of Fay Thompson Deposition Testimony. Cumulative under Fed. R. Evid. 403.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Peter J. McAndrews	13:18-15:11	Improper predicate for opinion testimony Fed. R. Evid. 701, 702 and 703. Mr. McAndrews was not designated as an expert witness.
Peter J. McAndrews	44:1-47:18	Improper predicate for opinion testimony Fed. R. Evid 701, 702 and 703. Mr. McAndrews was not designated as an expert witness. Hearsay and Speculation. Fed. R. Evid. 802. Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
Peter J. McAndrews	48:13-49:22	Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
Peter J. McAndrews	55:12-56:18	Optional completeness to avoid confusion.
Peter J. McAndrews	65:17-68:9	Improper predicate for opinion testimony Fed. R. Evid 701, 703 and 703. Mr. McAndrews was not designated as an expert witness. Hearsay Fed. R. Evid. 802. Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
Peter J. McAndrews	68:10-70:14	Hearsay Fed. R. Evid. 802. Irrelevant and immaterial under Fed. R. Evid. 402.
Peter J. McAndrews	70:15-71:5	Hearsay Fed. R. Evid. 802. Improper predicate for opinion testimony Fed. R. Evid. 701, 702 and 703. Mr. McAndrews was not designated as an expert witness. Irrelevant and immaterial under Fed. R. Evid. 402. If deemed relevant, the probative value is outweighed by danger of unfair prejudice under Fed. R. 403.
Peter J. McAndrews	71:6-9	Optional completeness to avoid confusion.
Peter J. McAndrews	79:4-81:2	Hearsay Fed. R. Evid. 802.
Peter J. McAndrews	81:5-9	Optional completeness to avoid confusion.
Peter J. McAndrews	82:20-23	Nonresponsive
Peter J. McAndrews	83:25-84:11	Improper predicate for opinion testimony Fed. R. Evid 701, 702 and 703. Mr. McAndrews was not designated as an expert witness.
Peter J. McAndrews	84:12-13	Speculation.
Peter J. McAndrews	87:16-17	The offer is not in question/answer format; the designation is part of a question without any answer.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Peter J. McAndrews	87:18-21	Optional completeness to avoid confusion.
Peter J. McAndrews	89:1-91:8	Hearsay. Fed. R. Evid. 802.
Peter J. McAndrews	91:9-16	Improper predicate for opinion testimony Fed. R. Evid. 701, 702 and 703. Mr. McAndrews was not designated as an expert witness.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Richard Frenkel	12:20-13:1	The offer is not in question/answer format; the designation begins with an answer and no question.
Richard Frenkel	20:4-7	Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Richard Frenkel	20:7-8	Objections not to be read to the jury.
Richard Frenkel	24:23-25	Argumentative. Misstates facts.
Richard Frenkel	25:1-2	Objections not to be read to the jury.
Richard Frenkel	25:6-7	Argumentative.
Richard Frenkel	25:8-9	Objections not to be read to the jury.
Richard Frenkel	26:13-14	Optional completeness to avoid confusion.
Richard Frenkel	27:25-28:2	Argumentative.
Richard Frenkel	28:3-4	Objections not to be read to the jury.
Richard Frenkel	30:10-11	Argumentative.
Richard Frenkel	30:12-13	Objections not to be read to the jury.
Richard Frenkel	31:2-4	Argumentative. Misstates facts.
Richard Frenkel	31:5-6	Objections not to be read to the jury.
Richard Frenkel	31:8-10	Argumentative. Misstates facts.
Richard Frenkel	31:11-12	Objections not to be read to the jury.
Richard Frenkel	31:20-22	Argumentative.
Richard Frenkel	31:23	Objections not to be read to the jury.
Richard Frenkel	32:1-4	Argumentative.
Richard Frenkel	32:5	Objections not to be read to the jury.
Richard Frenkel	37:25-38:2	Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Richard Frenkel	38:3	Objections not to be read to the jury.
Richard Frenkel	38:6-7	Argumentative. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Richard Frenkel	38:8-9	Objections not to be read to the jury.
Richard Frenkel	38:19-20	Vague, ambiguous. Argumentative. Speculation.
Richard Frenkel	38:21-22	Objections not to be read to the jury.
Richard Frenkel	39:9-11	Argumentative. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Richard Frenkel	39:12-13	Objections not to be read to the jury.
Richard Frenkel	40:10-11	Argumentative. Misstates facts.
Richard Frenkel	40:12-12	Objections not to be read to the jury.
Richard Frenkel	40:17-24	Argumentative. Misstates facts.
Richard Frenkel	40:21; 40:25	Objections not to be read to the jury.
Richard Frenkel	41:2	Vague and ambiguous. Argumentative. Misstates facts.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Richard Frenkel	41:3-4	Objections not to be read to the jury
Richard Frenkel	41:11	Objections not to be read to the jury
Richard Frenkel	41:20-21	Objections not to be read to the jury
Richard Frenkel	42:4	Objections not to be read to the jury
Richard Frenkel	42:12-13	Objections not to be read to the jury
Richard Frenkel	42:17-25	Argumentative. Misstates facts.
Richard Frenkel	42:22-23	Objections not to be read to the jury
Richard Frenkel	43:1-2	Objections not to be read to the jury
Richard Frenkel	43:11	Vague and ambiguous, undefined terms.
Richard Frenkel	43:12-13	Objections not to be read to the jury.
Richard Frenkel	43:18-22	Argumentative. Compound.
Richard Frenkel	43:23-24	Objections not to be read to the jury.
Richard Frenkel	44:3-4	Argumentative. Misstates facts.
Richard Frenkel	44:5-6	Objections not to be read to the jury.
Richard Frenkel	44:8-9	Argumentative. Vague and ambiguous. Misstates facts.
Richard Frenkel	44:10-11	Objections not to be read to the jury
Richard Frenkel	44:15-16	Argumentative. Speculation.
Richard Frenkel	44:17-18	Objections not to be read to the jury
Richard Frenkel	44:22-24	Argumentative. Speculation.
Richard Frenkel	44:25	Objections not to be read to the jury.
Richard Frenkel	45:5-6	Cumulative. Fed. R. Evid. 403. Argumentative. Speculation.
Richard Frenkel	45:7-9	Objections not to be read to the jury.
Richard Frenkel	45:10	Cumulative. Fed. R. Evid. 403. Argumentative. Speculation.
Richard Frenkel	45:11	Objections not to be read to the jury.
Richard Frenkel	45:23-46:1	Argumentative.
Richard Frenkel	46:2-3	Objections not to be read to the jury.
Richard Frenkel	46:16-20	Argumentative. Vague and ambiguous.
Richard Frenkel	46:21-22	Objections not to be read to the jury.
Richard Frenkel	47:12-14	Argumentative. Speculation.
Richard Frenkel	47:15-16	Objections not to be read to the jury.
Richard Frenkel	49:3-5	Argumentative. Speculation.
Richard Frenkel	49:6	Objections not to be read to the jury.
Richard Frenkel	49:8	Argumentative. Ambiguous.
Richard Frenkel	49:9-10	Objections not to be read to the jury.
Richard Frenkel	49:13-18	Optional completeness to avoid confusion.
Richard Frenkel	49:21-50:19	Optional completeness to avoid confusion.
Richard Frenkel	51:18-21	Argumentative. Misstates facts.
Richard Frenkel	51:22	Objections not to be read to the jury.
Richard Frenkel	51:25	Objections not to be read to the jury.
Richard Frenkel	52:17	Optional completeness to avoid confusion.



<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Richard Frenkel	52:20-21	Optional completeness to avoid confusion.
Richard Frenkel	53:16-21	Optional completeness to avoid confusion.
Richard Frenkel	55:14-16	Discussion with counsel.
Richard Frenkel	56:12-13	Speculation.
Richard Frenkel	56:18-19	Argumentative.
Richard Frenkel	58:22-23	Privileged. Attorney client. Work product.
Richard Frenkel	58:24-18	Discussion with and among counsel.
Richard Frenkel	73:20-22	Argumentative. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Richard Frenkel	73:23-24	Objections not to be read to the jury.
Richard Frenkel	74:2-4	Argumentative. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Richard Frenkel	74:5	Objections not to be read to the jury.
Richard Frenkel	76:9-13	Argumentative. Speculation.
Richard Frenkel	76:14	Objections not to be read to the jury.
Richard Frenkel	76:16	Vague and ambiguous. Argumentative. Speculation.
Richard Frenkel	76:17	Objections not to be read to the jury.
Richard Frenkel	76:22-24	Optional completeness to avoid confusion.
Richard Frenkel	77:3-4	Optional completeness to avoid confusion.
Richard Frenkel	79:20-23	Argumentative. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Richard Frenkel	79:24-25	Objections not to be read to the jury.
Richard Frenkel	80:8	Argumentative. Misstates facts.
Richard Frenkel	80:9	Objections not to be read to the jury.
Richard Frenkel	80:11	Argumentative. Misstates facts.
Richard Frenkel	80:12	Objections not to be read to the jury.
Richard Frenkel	81:1-16	Optional completeness to avoid confusion.
Richard Frenkel	87:18	Sidebar.
Richard Frenkel	88:1	Sidebar.
Richard Frenkel	90:3-8	Argumentative. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Richard Frenkel	90:9	Objections not to be read to the jury.
Richard Frenkel	90:13-17	Argumentative. Speculative.
Richard Frenkel	90:18	Objections not to be read to the jury.
Richard Frenkel	95:7-8	Objections not to be read to the jury.
Richard Frenkel	97:9	Objections not to be read to the jury.
Richard Frenkel	101:15-18	Discussion with counsel.
Richard Frenkel	101:23-25	Argumentative. Speculation.
Richard Frenkel	102:1-2	Objections not to be read to the jury.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Richard Frenkel	114:17-18	Argumentative. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Richard Frenkel	114:19-20	Objections not to be read to the jury.
Richard Frenkel	114:23	Argumentative.
Richard Frenkel	114:24	Objections not to be read to the jury.
Richard Frenkel	115:5	Argumentative. Cumulative.
Richard Frenkel	115:6-7	Objections not to be read to the jury.
Richard Frenkel	115:10-11	Argumentative. Cumulative.
Richard Frenkel	115:12-13	Objections not to be read to the jury.
Richard Frenkel	115:16-17	Argumentative. Cumulative. Compound. Harassing.
Richard Frenkel	115:18-19	Objections not to be read to the jury.
Richard Frenkel	115:21	Argumentative. Cumulative. Compound. Harassing.
Richard Frenkel	115:22-23	Objections not to be read to the jury.
Richard Frenkel	116:13-14	Argumentative. Speculative.
Richard Frenkel	116:15	Objections not to be read to the jury.
Richard Frenkel	116:20-117:2	Sidebar.
Richard Frenkel	117:4-6	Argumentative. Misstates facts.
Richard Frenkel	117:7	Objections not to be read to the jury.
Richard Frenkel	117:13-14	Argumentative. Misstates facts.
Richard Frenkel	117:15	Objections not to be read to the jury.
Richard Frenkel	121:12	Objections not to be read to the jury.
Richard Frenkel	122:4-5	The offer is not in question/answer format; the designation begins with an answer and no question.
Richard Frenkel	123:6-8	Argumentative.
Richard Frenkel	123:9	Objections not to be read to the jury.
Richard Frenkel	123:12-14	Privileged. Attorney client. Work product.
Richard Frenkel	124:7-12	Privileged. Attorney client. Work product.
Richard Frenkel	125:4-7	Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Richard Frenkel	125:8	Objections not to be read to the jury.
Richard Frenkel	125:22-25	Argumentative. Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Richard Frenkel	126:1	Objections not to be read to the jury.
Richard Frenkel	128:17-21	This testimony involves the use of Cisco Privileged documents and/or (2) testimony that has been designated as Highly Confidential pursuant to the Protective Order in this case.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Richard Frenkel	129:15-21	This testimony involves the use of Cisco Privileged documents and/or (2) testimony that has been designated as Highly Confidential pursuant to the Protective Order in this case. This offer is not in question/answer format; the designation begins with an answer and no question.
Richard Frenkel	131:15-17	Optional completeness to avoid confusion.
Richard Frenkel	131:19-22	Optional completeness to avoid confusion.
Richard Frenkel	132:5-9	Speculation. Improper predicate for opinion testimony. Fed. R. Evid. 701, 702 and 703.
Richard Frenkel	132:10	Objections not to be read to the jury.
Richard Frenkel	132:23-133:11	Optional completeness to avoid confusion.
Richard Frenkel	133:16-20	Optional completeness to avoid confusion.
Richard Frenkel	141:1-144:21	This testimony involves the use of Cisco Privileged documents and/or (2) testimony that has been designated as Highly Confidential pursuant to the Protective Order in this case. This offer is not in question/answer format; the designation begins with an answer and no question.
Richard Frenkel	143:6-9	Sidebar.
Richard Frenkel	149:17-151:4	This testimony involves the use of Cisco Privileged documents and/or (2) testimony that has been designated as Highly Confidential pursuant to the Protective Order in this case.
Richard Frenkel	152:6-16	This testimony involves the use of Cisco Privileged documents and/or (2) testimony that has been designated as Highly Confidential pursuant to the Protective Order in this case.
Richard Frenkel	152:10-11	Argumentative. Misstates facts.
Richard Frenkel	152:12	Objections not to be read to the jury.
Richard Frenkel	152:25-153:14	Optional completeness to avoid confusion.
Richard Frenkel	155:15-16	This offer is not in question/answer format; the designation begins with an answer and no question.
Richard Frenkel	155:23-24	Argumentative. Speculation.
Richard Frenkel	155:25	Objections not to be read to the jury.
Richard Frenkel	156:2	Argumentative.
Richard Frenkel	156:3	Objections not to be read to the jury.
Richard Frenkel	156:6	Argumentative.
Richard Frenkel	156:7	Objections not to be read to the jury.
Richard Frenkel	156:10	Argumentative.
Richard Frenkel	156:11	Objections not to be read to the jury.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Richard Frenkel	156:14	Argumentative. Cumulative.
Richard Frenkel	156:15	Objections not to be read to the jury.
Richard Frenkel	158:8-159:1	Optional completeness to avoid confusion.

<b>Deponent</b>	<b>Page/Line</b>	<b>Objections</b>
Eric Albritton	154:12-14	Side bar. The offer is not in question/answer format the designation is a statement by a defendant's attorney.
Kurt Pankratz	27:4-5, 10, 20-21	Instructions to the witness not to be read to the jury.
Kurt Pankratz	28:3-7	Optional completeness to avoid confusion.
Kurt Pankratz	28:19-3	Testimony concerning privileged documents is highly confidential pursuant to the protective order and should not be used in open court.
Kurt Pankratz	29:4-8	Instructions to the witness not to be read to the jury. Sidebar.
Kurt Pankratz	34:4-22	Discussion between attorneys not to be read to the jury. Irrelevant and immaterial under Fed. R. Evid. 402. Hearsay,
Kurt Pankratz	34:4-35:15	Testimony concerning privileged documents is highly confidential pursuant to the protective order and should not be used in open court.
Douglas Kubehl	34:23	Objections not to be read to the jury
Douglas Kubehl	34:13-35:15	Improper opinion testimony, and no designation of this witness as an expert. Fed. R. Evid. 701, 702. Misstates that facts of the case.
Rachel Wilson	7:12-16	Optional completeness to avoid confusion.
Rachel Wilson Cross Designations	10:12-23	Already included in Plaintiff's Designation of Rachel Wilson Deposition Testimony. Cumulative under Fed. R. Evid. 403.
Shelly Moore	10:1-6	Optional completeness to avoid confusion.
Shelly Moore	11:25-12:6	Optional completeness to avoid confusion.
Shelly Moore	16:8-11	Optional completeness to avoid confusion.
Shelly Moore	16:21-17:6	Optional completeness to avoid confusion.
Shelly Moore	21:3-11	Optional completeness to avoid confusion.
Shelly Moore Cross Designations	24:16-28:9 (Cross)	Already included in Plaintiff's Designation of Shelly Moore Deposition Testimony. Cumulative under Fed. R. Evid 403.