

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**JAMIE LEIGH JONES,
Plaintiff,**

v.

**HALLIBURTON COMPANY d/b/a
KBR KELLOGG BROWN & ROOT
(KBR);
Defendants.**

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CIVIL ACTION NO. H-07-2719

**DEFENDANT CHARLES BORTZ'S SUPPLEMENTAL OBJECTIONS TO
PLAINTIFF'S PAGE/LINE DEPOSITION EXPERTS
OF CHARLES BORTZ**

CHARLES BORTZ

<u>Page/Line</u>	<u>to</u>	<u>Page/Line</u>	<u>Objection</u>
15/11	-	20/19	No conviction, bad act is irrelevant
30/13	-	30/25	Optional completeness, misleading
31/01	-	31/09	Optional completeness, misleading
46/04	-	46/10	Speculation
47/21	-	47/25	Speculation
48/01	-	48/20	Speculation, relevance
49/03	-	49/09	Objection, relevance
49/10	-	49/01 (ends @ "know.")	Speculation, because of 50/01 to 50/02
53/14	-	53/25	Sidebar
60/14	-	60/21	Hearsay
60/25	-	61/18	Hearsay
75/11	-	75/16	No question
75/17	-	76/01	No question
116/16	-	116/23	Relevance and 403
118/03	-	118/10	Irrelevant, prejudicial
118/24	-	119/05	Inadmissible evidence, changing in drinking policy is a subsequent remedial measure
120/09	-	120/13	Hearsay, relevance and 403
158/13	-	158/19	Hearsay

Respectfully submitted,

MCKINNEY & COOPER, L.L.P.

By: /s/ Andrew T. McKinney IV

Andrew T. McKinney IV

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DEFENDANT CHARLES BORTZ

CERTIFICATE OF SERVICE

On June 11, 2011, I certify that a copy of **DEFENDANT CHARLES BORTZ'S OBJECTIONS TO PLAINTIFF'S PAGE/LINE DEPOSITION EXPERTS** was served and electronically filed on the CM/ECF system, which will automatically serve a Notice of Electronic Filing on the following attorneys:

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