

VIRGINIA:

IN THE CIRCUIT COURT OF FAIRFAX COUNTY

JOHN C. DEPP, II,

Plaintiff and Counterclaim Defendant,

v.

AMBER LAURA HEARD,

Defendant and Counterclaim Plaintiff.

FILED
CIVIL PROCESSING
2022 MAR 28 2:39

JOHN T. FREY
CLERK, CIRCUIT COURT
FAIRFAX, VA

Civil Action No.: CL-2019-0002911

**DEFENDANT AND COUNTERCLAIM PLAINTIFF AMBER LAURA HEARD'S
OBJECTIONS TO THE COUNTER-DESIGNATIONS OF PLAINTIFF AND
COUNTERCLAIM DEFENDANT JOHN C. DEPP, II, AND REBUTTAL
DESIGNATIONS OF DEPOSITION TESTIMONY FOR TRIAL
(And Objections and Counter-Designations to Walter Hamada)**

COMES NOW the Defendant and Counterclaim Plaintiff, Amber Laura Heard, by counsel, and pursuant to the Scheduling Order issued in this case on April 22, 2021, and hereby objects to Plaintiff and Counterclaim Defendant John C. Depp, II's Counter-Designations of deposition testimony for trial as follows, and designates the following rebuttal deposition testimony for trial.

All designations are subject to rulings on Motions *in Limine* and other rulings of the Court, and Defendant/Counterclaim Plaintiff reserves the right to modify or withdraw any designations based on rulings of the Court and/or other developments prior to or at trial.

Defendant and Counterclaim Plaintiff's Rebuttal designations set forth below are in addition to the deposition testimony previously designated or counter-designated, and those previous designations are hereby incorporated by reference into these Rebuttal designations.

To the extent that any initial designations of Plaintiff and Counterclaim Defendant overlap his counter-designations, Defendant and Counterclaim Plaintiff's objections to the initial designations are incorporated herein by reference.

KEY TO OBJECTIONS

R=Irrelevant or Immaterial: H=Hearsay: F/A=No Foundation or Authenticity: MIL=Currently the subject of Motions in Limine: P=Prejudice outweighs probative value: D=Document does not accurately and completely depict facts and events or is not authentic business document: IC= Document is incomplete: S=Settlement Communications: SS=Self-serving: NP=Not produced in discovery, although requested: SP=Speculative/Calls for Speculation: L=Leading: AF= Assumes Facts Not in Evidence: C= Compound: IR= Improper Use of Document/Attempt at Impeachment/Improper Attempt to Refresh Recollection: MS= Mischaracterizes/Misstates Testimony: AA=Asked and Answered: O=Designation of Objection: UN=Unresponsive.

Deposition of Laurel Anderson (February 21, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

22:21-23:12	MIL, R
43:14-44:1	O
159:11-160:1	R, SP
161:12-17	O
162:3-4	O
187:11-15	L, H
191:9-11	O
192:2-14	MIL, O
199:16-19	O
203:19-22	O
209:18-210:6	O

Defendant's Rebuttal Designations of Laurel Anderson: None.

Deposition of Amy Banks (February 7, 2022)

Page/Line Objections

51:17-19	IC
81:1-9	H

Defendant's Rebuttal Designations of Amy Banks:

Page Line

56	22
57	1-5

Deposition of Robin Baum (January 20, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

49:9-12	SP
53:13-15	R
65:16-21	SP
99:15-17	UN
144:19-145:4	O
147:15-18	O
156:9-16	SP
180:16-18	F/A

Defendant's Rebuttal Designations of Robin Baum

Page Lines

59	6-7 (through "heard")
61	5-7 and 12-14
63	18 ("I – I can't—")
64	9 (through "I")
77	13 (through first "think")
78	1-2 (through "that")
108	15
128	11-12
147	11 ("I did")
158	3 (through second "yeah") 19-20
169	9 and 14-18
172	21-22
173	1-2 and 4-5
196	14-15

Deposition of Lisa Beane (December 13, 2019)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

98:16-18	R, O
120:13-22	R, O
165:7-18	L, C
167:9-170:7	R
172:15-174:4	R
174:5-176:21	R
177:14-21	R
178:12-179:8	R
186:2-4	R
186:14-23	R
187:15-17	R
187:23-188:10	R
198:14-19	MS

Defendant's Rebuttal Designations of Lisa Beane

Page Lines

186	13
188	11-18
197	23-25
198	1-6
215	4-18
217	17-19

Deposition of Sean Bett (January 25, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

30:16-17	O
54:15-16	O

Defendant's Rebuttal Designations of Sean Bett

Page Lines

152	15-19
153	16-17 and 19-21
154	2-12
169	13-22
170	1-4

189	16-22
190	1-18 and 22
191	1-2 and 5

Deposition of Alan S. Blaustein (January 21, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

126:1-4	R, IC
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Defendant's Rebuttal Designations of Alan S. Blaustein

Page Lines

126	5-6
158	8-17
166	3
177	22
178	1-2

Deposition of Jacob Bloom (March 2, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

12:16-19 and 22	O, H
13:1-8	O, H, SS
17:6-7 and 21	R, H
33:14-16	R, H
34:6-8	O, H
43:11-18	R, H, SS
45:4-8	R, H, SS
46:9-10	R, H, SS
61:10-12	O, H, SS
70:18-21	R, H

Defendant's Rebuttal Designations of Jacob Bloom: None.

Deposition of Christian Carino, Day 1 (January 19, 2021)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

27:12-16	O
35:5-14	O
47:1-13	O
52:3-4	O
57:2-14	O
61:12-62:8	R
61:16-19	O
78:6-16	R, O
92:3-14	R, O
93:9-16	R
109:2-12	O
124:10-14	R, O
138:5-15	R, O
143:21-144:6	R, F/A
165:13-16	R

Defendant's Rebuttal Designations of Christian Carino

Page Lines

35	15 (through "that")
45	6-9
62	16-21
143	5 (through "don't") 8-13

Deposition of Connell Cowan (December 8, 2021)

Objections to Plaintiff's Counter-Designations: None.

Defendant's Rebuttal Designations of Connell Cowan

Page Lines

111	13-14 and 17-22
112:	1

Deposition of Officer Christopher Diener (November 23, 2021)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

30:2	R
33:2-4	R
42:6-17 and 21-22	R, H
43:1-2	R
50:10-17	R, H, O
52:22	O, H
53:1-8 and 18-22	O, R, H
54:1-14	R, H
81:7-15	O, R, H
91:9-12	R
105:17-22	O, H
106:1-4	O
106:6-7	R, H
108:1-5	R, H
116:7	R

Defendant's Rebuttal Designations of Christopher Diener: None.

Deposition of Stephen Deuters (February 24, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

28:5	O
48:20	O
130:4-6	O
130:22-131:1	O

Defendant's Rebuttal Designations of Stephen Deuters: None.

Deposition of Laura Divenere (January 15, 2021)

Objections to Plaintiff's Counter-Designations

Page/Line	Objections
82:21	O
83:12-13	O
104:8-11	O
105:5	O
105:14-15	O
113:16-20	IR
114:7-13	IR
115:1-21	IR
116:20-117:2	IR
117:7-118:4	IR
117:15-118:4	O
118:16-119:20	IR
138:10-17	IIR
139:6-141:21	IR
141:3-4	O
145:21-146:21	O
147:20-148:8	O

Defendant's Rebuttal Designations of Laura Divenere

Page	Lines
38	8-9 and 12

Deposition of Terence Dougherty (December 2, 2021)

Objections to Plaintiff's Counter-Designations

Page/Line	Objections
80:18-19	R
81:4-7	R
81:14-21	R
260:13-261:18	R, H, F/A, SP, L, O
288:8-278:4	R, H, F/A, SP, L, O
435:18	O

Defendant's Rebuttal Designations of Terence Dougherty

Page Lines

81	22
82	4-9 and 15-19
83	20-22
84	8-19

Deposition of Joshua Drew (November 19, 2019)

Objections to Plaintiff's Counter-Designations: None.

Defendant's Rebuttal Designations of Joshua Drew

Page Line

11	1-10, 16 and 20
264	1-6

Deposition of Erin Falati (February 4, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

93:12-16	O
215:13-216:1	H, SP

Defendant's Rebuttal Designations of Erin Falati

Page Lines

145	20-22
146	1-2

Deposition of Officer William Gatlin (November 23, 2021)

Objections to Plaintiff's Counter-Designations

Page/Line	Objections
27:13-14	R
51:1-2	R

Defendant's Rebuttal Designations of Officer William Gatlin

Page	Lines
82	22

Deposition of Eric George (April 5, 2021)

Page/Line	Objections
16:8-10	R
31:1-2	R,H,F
36:11-16	R
170:17-22	O, MIL, R, H, P
171:1,6-22	O, MIL, R, H, P
172:1-6,15-22	O, MIL, R, H, P
173:1-11,13-22	O, MIL, R, H, P
174:13-22	O, MIL, R, H, P
175:1-22	O, MIL, R, H, P
176:1-22	O, MIL, R, H, P
177:1-22	O, MIL, R, H, P
178:1-12,14-20	O, MIL, R, H, P
187:20-21	R
194:12-22	O, R, P
195:1-3	O, R, P
201:16-19	O, R, H, F, SP
202:3-4	O, R, H, F, SP
244:1-5,10-13	O, R, H, F, SP
245:2-14	O, MIL, R, H, F, P
250:7-22	O, MIL, R
251:1-5,11-13	O, MIL, R
252:5-22	O, MIL, R
253:1-4	O, MIL, R

Defendant's Rebuttal Designations of Eric George

Page Line

187	22
188	1-3

Deposition of Cornelius Harrell (January 13, 2021)

Page/Line Objections

35:2-6	R, MIL, P
35:10-12	R, MIL, P
53:7	H, R
162:3-5	SP

Defendant's Rebuttal Designations of Cornelius Harrell

Page Lines

103	1-2 and 5-6
114	19
115	1-3

Deposition of Melanie Inglessis (February 2, 2021)

Page/Line Objections

20:3-9	R, UR
75:14 and 16	R
88:4-6	SP
91:6-9	SP
93:33-94:7	MS, L, SP, R, F/A, H
112:8-10	SP
112:16-19	L, H, F
113:2-6	SP, H, F
114:8-9	L
115:3-5	L, C
116:11-13	UN
119:19-21	MS, 1
120:1-8	IR
139:21-22	L
140:4-6	L
145:17-18	L

148:6-8 and 12-14	L
154:20-155:1	L, H, F/A
156:19-22	L
160:3-6	L
161:22-162:3	L
166:3-4, 7-9 and 12-13	L
168:11-15	MS
171:5-7 and 10-13	L
179:2-6 and 10-12	L
189:4-5	SP
195:2-3 and 18-20	L

Defendant's Rebuttal Designations of Melanie Inglessis

Page Lines

32	12 - (from "that's") – 15
33	6 (from "I") – 9
58	17 (from "And") – 18
91	14-15 and 18
94	9 and 14-14
112	20
117	12 (from "So") – 15

Deposition of Tracey Jacobs (January 28, 2021)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

55:22	R, SP, IC, UN
62:15	R, F, IC, UN
63:13-15	R, SP, UN
72:9-11	R, SP, UN
82:2-3	R, SP, UN
99:14-16	F, SP

Defendant's Rebuttal Designations of Tracey Jacobs: None

Deposition of David Kipper (February 22, 2021)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

194:5-11	L
194:12-21	L, SP
196:22-197:4	L

Defendant's Rebuttal Designations of David Kipper

Page Lines

99	17-18
168	19

Deposition of Sergeant Peter Kouvelis (January 4, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

27:18-22	R, H
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Defendant's Rebuttal Designations of Sergeant Peter Kouvelis: None

Deposition of Jessica Kovacevic (March 1, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

41	3-4 and 8-14
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Defendant's Rebuttal Designations of Jessica Kovacevic: None

Deposition of Roberto Lopez (March 8, 2021)

Objections to Plaintiff's Counter-Designations: None.

Defendant's Rebuttal Designations of Roberto Lopez

Page Lines

96	13-15
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Deposition of Joel Mandel (January 26, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

58:22-59:1	R
170:18:171:3	O, R
172:20-21	R

Defendant's Rebuttal Designations of Joel Mandel

Page Lines

59	1
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Deposition of Elizabeth Marz (November 26, 2019)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

67:10-13 and 20-23	IR
265:15-20	O

Defendant's Rebuttal Designations of Elizabeth Marz

Page Lines

76	14-25
77	1-9
91	7-12
155	15-25

175	18-25
176	1-14
179	23-25
276	21-23

Deposition of Michelle Mulrooney (March 1, 2021)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

58:17-22, 59:1-10	R, F, H, P
66:21	R, H, F, P, IR
69:12-20	R, H
71:7-10	R, H, F

Defendant's Rebuttal Designations of Michelle Mulrooney: None.

Deposition of Tina Newman (February 11, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

13:20-22	IC, R, H, F
14:6-22, 15:1-14	IC, R, H, F, UN
15:21-22, 16:1-22, 17:1-22, 18:1-19	R, H, F, UN
19:19-22, 20 1-22	R, H, F, UN
22:5-22, 23:1-22	R, H, F, UN
36:10-20	F, H, R
36:21-22, 37:1-3	R, H, F

Defendant's Rebuttal Designations of Tina Newman: None.

Deposition of Detective Marie Sadanaga (March 12, 2021)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

59:4-6,13	R, F
64:10-11	R
181:12-22,182:1-4	R, F, H

Defendant's Rebuttal Designations of Detective Marie Sadanaga

Page Lines

130	13-14 and 18-22
131	1, 3-6 and 10
135	18-22
136	1

Deposition of Raquel Rose Pennington, Volume 1 & 2 (January 20-21, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

11:25-12:3	IR
13:13-15:8	IR
68:2-13	IR
74:17-21	F, SP
112:24-113:1	IR
135:5-12	H

Defendant's Rebuttal Designations of Raquel Rose Pennington, Volume 1

Page Lines

22	18-25
74	23
75	1-6
81	16-18 and 22-24
92	8-10

Objections to Plaintiff's Counter-Designations of Raquel Rose Pennington, Volume 2

Page/Line Objections

212:13-15	O
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Defendant's Rebuttal Designations of Raquel Rose Pennington, Volume 2: None.

Deposition of Debbie (Depp) Russel (March 10, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line	Objections
36:15-16	H
57:1-2	O

Defendant's Rebuttal Designations of Debbie (Depp) Russel

Page	Line
23	10-12
26	22
27	1-2 and 7-12
37	9-10 12 (from "I") - 14
43	8-11 16 (from "That") - 20 22 (from "And")
44	1-3 (through "thing") 5-6 20 -21 (through "but")
45	6-8 and 12-19
47	22
48	1-2 and 7
50	4-5, 8, 12-13 and 16
54	17-22
55	1-2 12 (from "So") - 16 18-22
56	1 2 (from "I") - 5
60	14-18 (through "suggested")
61	12 (from "I just") - 13
64	11-22
65	1
70	17-18

Deposition of Rami Sarabi (March 2, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line	Objections
23:22-24:4	O, SP, L
78:9-14	H, L
79:6-11	AA
79:12-14	L, AA
80:13-20	L, AA
81:1-4	L
82:2-4	H
82:5-12	L, H, AA
82:20-22	SP

Defendant's Rebuttal Designations of Rami Sarabi

Page	Line
82	15-19

Deposition of Kristina Sexton (December 18, 2019)

Objections to Plaintiff's Counter-Designations

Page/Line	Objections
44:16-18	O
45:20-22	O
47:22-24	O

Defendant's Rebuttal Designations of Kristina Sexton

Page	Lines
21	16
40	11-16
115	21-24
116	3-10 and 15-19
118	14-25
119	12-21 (through "all")
120	3-11 (through "Yes")

123	17-25
140	22-25
142	5 (from "Let's") – 16 19-20

Deposition of iO Tillett Wright (March 10, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line	Objections
59:4-6, 13	R, F
64:10-11	R
181:12-22, 182:1-4	R, F, H
252:3-8	R, F, H
355:17-18, 356:2-8	R, F, H
356:2-8	R, F, H
357:1-2, 7-12	R, F, H
358:21-22, 359:1-5	R, F, H
359:16-17-360:1-5	R, F, H
373:10-12	R, F, H

Defendant's Rebuttal Designations of iO Tillett Wright

Page	Lines
311	20-22
312	5-6
314	11-12
356	8 (from "I") – 15
358	21-22
359	1-5 and 16-17
360	1-5
373	10-12 and 20-22
374	1-3
375	1-4, 9-17 and 20-21
376	11-14

Deposition of Monroe Tinker (January 6, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

27:7-10	O
69:11-12	O

Defendant's Rebuttal Designations of Monroe Tinker: None

Deposition of Adam Waldman (February 15, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

21:16-19	O
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Defendant's Rebuttal Designations of Adam Waldman: None

Deposition of Jack Whigham (January 20, 2021)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

27:11	O
28:6	O
65:3-9	O
67:2-9	O

Defendant's Rebuttal Designations of Jack Whigham: None.

Deposition of Edward White (February 22, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line Objections

59:1-3	O
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Defendant's Rebuttal Designations of Edward White: None.

Deposition of Bruce Witkin (February 17, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line	Objections
22:6-9	O
42:7-10	O
98:18-20	O
103:1-4	O
104:11-16	O
106:1-4	O
138:9-13	O

Defendant's Rebuttal Designations of Bruce Witkin

Page	Lines
17	15-22

Deposition of Ben Wizner (November 17, 2021)

Objections to Plaintiff's Counter-Designations

Page/Line	Objections
65:6-20	F/A, SP, H, L, O
66:7-22	F/A, SP, H, L, O

Defendant's Rebuttal Designations of Ben Wizner

Page	Lines
62	6-11 and 14
63	7-11 and 14
64	19-22
65	4-5
68	10-18 and 21-22
69	4-10 and 15-22
70	4
335	20-22
336	1, 4-5, 11-12 and 15-19
337	5-8 and 10

**OBJECTIONS AND COUNTER-DESIGNATIONS TO PLAINTIFF
AND COUNTERCLAIM DEFENDANT JOHN C. DEPP, II'S
DESIGNATIONS OF DEPOSITION TESTIMONY OF WALTER HAMADA**

Deposition of Walter Hamada, Corp. Designee for Warner Bros.(March 15, 2022)

Objections to Plaintiff's Counter-Designations

Page/Line	Objections
13:2-6, 10	L, F, H
13:12-14,18	L, F, H
13:22-14:7	L, H
14:14-22	H, F
15:3-22	L, F, H
16:2-20	L, F, H
17:17-20	L, H, F
18:4-21	L, H, F
19:1-14	H, UR
19:19-21	R, H, F, P, O
20:18-20	O
21:3-20	L, H, F
21:22-22:5	L, H, F
22:7-22	L, H, F
23:1—8	L, H, F
23:9-24:13	L, H, F, IR
25:12-18	L, H, F, SP
26:7-9	R
27:1-11	L, R
27:16-22 through 28:1-11	L, H, F, IR, R. MIL
28:12-21	L, H, F
29:1-21	L, H, F
30:1-7	L, H, F
30:20-21, 31:1-14	H, F
31:18-22, 32:1-13	H, F
32:20-21, 33:1-3	H, F
33:9-22	H
34:2-4	L, H
34:5-11	H, F
34:13-19	L, H, F
34:21-22, 35:3	L
35:14-22-36:6	H, F
36:8-13	L, H, F
36:15-22, 37:1-2	L, H, F
37:4-18	L, H, F

37:20-22, 38:1-7	L, H, F
38:9-16	H, F, SP
38:18-21, 39:1-5	L, H, F
39:7-16	R, F
39:17-22, 40:1-6	L, H, F, IR, MIL, R
40:14-21	L, H, F
41:1-13	H, F, SP
41:15-21, 42:1-6	H, F, SP
42:8-13	L, H, F, SP
42:18-22, 43:1-12	L, H, F, IR, MIL
43:20-22, 44:1-11	L, H, F
44:21-45:1-2	H, F, IR, MIL
110:8-10	R

Defendant's Counter Designations of Walter Hamada, Corp. Designee for Warner Bros.

Page Line

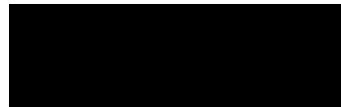
9	2-16
10	20-22
11	1-2 and 13-17
12	10 (from "what") – 15
15	1-2
17	12-14 (through first "2018")
45	7-10 and 12-22
46	1-22
47	1-3 and 16-22
48	1-3 8 (from "did") – 15 17 (from "Zach") – 18 20-22
49	10 (from "Did") – 13
50	9-12, 16-19 and 21-22
51	1-3, 6-9, 11-13 and 17-21
52	1-15 and 18-22
53	1-3, 5-13, 16-18 and 20-22
54	1 and 22
55	1-4, 7-8, 10-14, 17 and 19-20 [Replace "Exhibit Number 2" with Def Ex]
57	5-9, 15-17 and 19-22
58	1-5, 8-11, 13-16 and 19-20
62	9-10 [Replace "Exhibit Number 3" with Def Ex] 15 (from "And") – 22
63	1
66	7-12

	20 (from "I'm") – 22 [Replace "Exhibit Number 4" with Def Ex]
67	1-20
68	1-3 and 22
69	1-6 and 9-22
70	1-11, 14-17 and 19-22
71	5-17 [Replace "Exhibit Number 5" with Def Ex] 22
72	1-2, 5-7, 9-12, 15-20 and 22
73	1-6, 10-14, 17 and 19-21
74	3-16 and 18-21
75	2-13, 15-17 and 19
76	4-5 and 11-22 [Replace Exhibit Number 6" with Def Ex]
77	1-4, 8-11, 14, 16-18 and 21-22
78	2 (from "So") – 4 8 10 (from "Now") – 12 16, 18-29 and 22
79	1, 3-6, 9, 11-13, 17-20 and 22
80	1-9 18 (from "Now") – 20, and 22
81	2-7 and 14-22 [Replace "Deposition Exhibit Number 7"
82	1-10 and 13-16 18 (from "The") – 22
83	1-9, 13-15 and 19-22
84	1-7, 10, 12-15, 18-19 and 21-22
85	1-3, 6-7 and 9-13
86	3-7, 9-11 and 14-15
87	7-10, 13-14, 16-17
88	2, 4-14 and 22
89	1-8 [Replace "Deposition Exhibit Number 8" with Def Ex] 16-22
90	1-22
91	1-2, 5 and 7-9
92	16-20
93	1-4, 6, 9 and 12-22
94	1-11, 14-15 and 17-22
95	1-16
99	6-7, 10,12-18 and 22 (from "I")
100	1-3 and 5-6
101	10-17 and 21
103	10 (from "And") – 22
104	1-14 and 18-20
105	2-5, 9-13 and 15-17
106	1-15
107	1-14 [Replace "Deposition Exhibit Number 1" with Def Ex]

108	13-19 and 21-22
109	1

March 25, 2022

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 25th day of March, 2022, by email, by agreement of the parties, addressed as follows:

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