

VIRGINIA :

IN THE CIRCUIT COURT OF FAIRFAX COUNTY, VIRGINIA

JOHN C. DEPP, II

*Plaintiff and Counterclaim
Defendant,*

v.

AMBER LAURA HEARD,

*Defendant and
Counterclaim Plaintiff.*

Civil Action No.: CL-2019-0002911

FILED
MAR 28 2022
JOHN T. FREY
Clerk of the Circuit Court
of Fairfax County, VA

**PLAINTIFF AND COUNTERCLAIM DEFENDANT JOHN C. DEPP, II'S
OBJECTIONS AND COUNTER-DESIGNATIONS OF DEFENDANT/COUNTERCLAIM
PLAINTIFF AMBER LAURA HEARD'S DEPOSITION DESIGNATIONS FOR TRIAL**

COMES NOW Plaintiff and Counterclaim Defendant John C. Depp, II ("Plaintiff"), by counsel, and pursuant to the Section XI of the Scheduling Order entered by this Court, submits the following objections to Defendant's designations of depositions, and Plaintiff's counter-designations of the depositions taken in this action, as deposition testimony that Plaintiff may introduce at trial, through video and audio display and/or via reading of the transcript. Plaintiff reserves the right to withdraw any of these objections or designations and/or to supplement these objections or designations as appropriate, including to the extent warranted based on any rulings of the Court or any counter-designations submitted by the Defendant. Plaintiff specifically reserves the right to use as counter-designations all deposition excerpts affirmatively designated by him in this action, and incorporates his affirmative designations by this reference, as well as any additional affirmative designations that may be made. Plaintiff further reserves the right to

supplement or otherwise amend his designations, counter-designations, and objections as appropriate.

**Deposition of Lauren Anderson, Ph.D., CCN
February 21, 2022**

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**Deposition of Amy Banks, M.D.
February 7, 2022**

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48	4-12	Hearsay (Va. R. S. Ct. 2:802); speculation, lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
49	13-17 and 19-22	Hearsay (Va. R. S. Ct. 2:802); speculation, lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403)	49:18
50	2 3 (from "what") – 10	Hearsay (Va. R. S. Ct. 2:802); speculation, lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403)	50:11-13, 17-19 51:2
52	2 (from "you") – 13 16-22		52:14-15
53	1-3 10 (from "I have") – 13 20-21	Incomplete designation as it began in the middle of an answer Hearsay (Va. R. S. Ct. 2:802); speculation, lacks foundation / personal knowledge (Va. R. S. Ct.	53:6-8, 9-10, 22

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		2:602); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
54	1-2 20 (from "And") – 22	Hearsay (Va. R. S. Ct. 2:802); speculation, lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	54:4-7
55	1-13 21 (from "Did") – 22	Lines 1-13: speculation, lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (R. 2:403); improper character evidence (Va. R. S. Ct. 2:404), assumes facts not in evidence; hearsay (Va. R. S. Ct. 2:802) Lines 21-22: hearsay (Va. R. S. Ct. 2:802); speculation, lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence	55:16-18 56:11-12, 14-19, 21 76:12-20 81:1-2, 4-9 84:18-20 86:5-8, 15-18
56	2-9	Hearsay (Va. R. S. Ct. 2:802); speculation, lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence	56:11-12, 14-19, 21 76:12-20 81:1-2, 4-9 84:18-20 86:5-8, 15-18
59	18-22 [Replace "Banks Exhibit 3" with Def. Ex.]		
60	1-20	Hearsay (Va. R. S. Ct. 2:802); speculation, lacks foundation / personal	60:21-22

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61	1-4 and 6-20	<p>Lines 1-4: speculation, lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (R. 2:403); improper opinion</p> <p>Lines 6-9: based on hearsay (Va. R. S. Ct. 2:802); lacks foundation / personal knowledge (Va. R. S. Ct. 2:602)</p> <p>Lines 10-20: hearsay (Va. R. S. Ct. 2:802); speculation, lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence; expert testimony; improper hypothetical</p>	56:11-12, 14-19, 21 76:12-20 84:18-20 86:5-8
62	18 (from "Amber") – 22	Line 22: hearsay (Va. R. S. Ct. 2:802)	
63	1-11 and 14-20	<p>Lines 1-8: hearsay (Va. R. S. Ct. 2:802); assumes facts not in evidence</p> <p>Lines 9-11, 14-20: hearsay (Va. R. S. Ct. 2:802); speculation, lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403)</p>	63:12-13, 21-22
64	1-3, 5-16, and 21-22	Lines 1-3: speculation, lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair	64:18-20 56:11-12, 14-19, 21 76:12-20 84:18-20

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		prejudice (Va. R. S. Ct. 2:403) Lines 5-20: hearsay (Va. R. S. Ct. 2:802); speculation, lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence; improper hypothetical	86:5-8
65	1-3 and 5-6 8 (from "what I meant") – 12	hearsay (Va. R. S. Ct. 2:802); speculation, lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence; improper hypothetical	65:7 56:11-12, 14-19, 21 76:12-20 84:18-20 86:5-8
71	12 (from "So") – 19 21-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403)	
72	1-2 and 4-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403), vague, expert testimony	72:3
73	1-9	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403), expert testimony	
74	16-17 and 20-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403), vague, hypothetical, expert testimony	74 :18-19
75	1-13 15 (from "is your") – 17 21-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403), vague, hypothetical, expert testimony	75:18, 20
76	1	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403), vague, hypothetical,	

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79	3-12	Hearsay (Va. R. S. Ct. 2:802); unfair prejudice (Va. R. S. Ct. 2:403)	
80	1 (from "So") – 18	Relevance (Va. R. S. Ct. 2:402): unfair prejudice (Va. R. S. Ct. 2 :403)	
83	15-18 and 21-22		
84	1-5 7 (from "And") -12 15-20	Lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); based on hearsay (Va. R. S. Ct. 2:802); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403)	
85	7 (from "you") – 12 15-22	Lines 7-9: hearsay (Va. R. S. Ct. 2:802); lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403) Lines 10-12, 15-22: hearsay (Va. R. S. Ct. 2:802); lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403)	85:13-14 56:11-12, 14-19, 21 76:12-20 84:18-20 86:5-8
86	1-4 and 9-14	Hearsay (Va. R. S. Ct. 2:802); lacks foundation / personal knowledge (R. 2:602); unfair prejudice (R. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403)	86:15-18 56:11-12, 14-19, 21 76:12-20 84:18-20 86:5-8
87	4-12	All lines: Lacks foundation / personal	56:11-12, 14-19, 21 76:12-20

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		<p>knowledge, calls for speculation (Va. R. S. Ct. 2:602); based on hearsay (Va. R. S. Ct. 2:802); unfair prejudice (Va. R. S. Ct. 2:403); improper opinion; assumes facts not in evidence</p> <p>Lines 4-8: improper character evidence (Va. R. S. Ct. 2:404)</p>	<p>84:18-20 86:5-8</p>

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November 22, 2019**

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29	2-3, 7-15 and 18-23 25 (from "what")		
30	2 (through "about") 9 (from "it was from") – 16 19 (from "but") – 20 24-25		
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38	4 (from "is") – 7		
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November 20, 2019**

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17	16-17 and 21-22	17:21-22 Relevance (Va. R. S. Ct. 2:402)	
18	1	Relevance (Va. R. S. Ct. 2:402)	
19	15 (from second "the amount") – 18	Relevance (Va. R. S. Ct. 2:402)	
20	1-2 3 (from "I can't") -11 22 (from second "over")		
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27	12 (from "Do") – 22		
28	1 4 (from "I don't") – 9	Vague & Ambiguous as to "certain point, "; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	28:2-3

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39	16-18	Vague & Ambiguous as to "career and reputation"; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	39:19-20
40	1-7 19 (from "has Mr.") - 20 22 (from "I think")		40:10-12, 40:21
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43	2 (from "yes") – 5 11 (from fourth "I") – 16 20-21	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	42:10-15, 43:6-10, 43:17-19
44	4-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	45:1-3
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46	6 (from "Do") – 22	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	

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48	1 and 4 6 (from second "do you") – 9 14-18	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	48:2-3, 49:9-12
51	9 (from "Were") – 22	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	52:3-5
52	1-2, 6-11 and 16-22	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	52:3-5, 52:12-13, 52:15
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58	9 (from "did") – 10 15-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	58:11-14, 59:1-4
59	7 (from "I overheard") – 17	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	59:1-4
60	5-19		60:20-21, 61:1
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63	6 (from "Do") – 8 11-16 18 (from "I mean") – 22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
64	1 and 4-8 9 (from "you") – 12 17-20	Vague & Ambiguous; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	64:2-3, 64:13-16
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69	15 16 (from "And") – 20	Vague & Ambiguous; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	69:21-70:3
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74	1-9 and 18-19	Lack of Authentication (Va. R. S. Ct. 2:901)	74:20-22
75	1-2, 4-6 and 11-19	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	75:7-10
76	13-17	Hearsay (Va. R. S. Ct. 2:802)	76:20-77:1
77	6-7 and 10-12 13 (from "I don't think") - 18	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	77:8-9, 77:19-22
78	2 (from "I") – 3 5-6 and 11-12	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	53:13-15, 78:7-9
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81	1-6, 10-15 and 19-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	81:7-9, 81:16-18

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85	2-4 and 17-19 22 (from second "I don't")	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	85:20-21
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88	1 (from "And") 3 (from "I don't") – 13	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
90	2 [Replace "Exhibit 6" with Def. Ex.] 4-5 13 (from "I'm") -15 18-20	Hearsay (Va. R. S. Ct. 2:802); Lack of Authentication (Va. R. S. Ct. 2:901); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	90:6-7, 90:12
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95	12-19	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
96	14-15	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
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105	4-5 and 7-8 13 (from "it's") – 14	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	105:9-11
107	5 [Replace "Exhibit 7" with Def. Ex.] 15-22	Lack of Authentication (Va. R. S. Ct. 2:901)	
108	1-14 and 17-22	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	108:16

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121	1-8 and 14-16 22 [Replace "Exhibit 14" with Def. Ex.]	Lack of Authentication (Va. R. S. Ct. 2:901); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
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124	1-7	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
126	9 – 17 [Replace "Exhibit 16" with Def. Ex.]	Lack of Authentication (Va. R. S. Ct. 2:901)	
127	5-9 13 (from "I") - 21	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	127:10-11
128	2, 4-5, 7, 13-15, and 18-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	128:8-10, 129:3-4

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131	1-7	Hearsay (Va. R. S. Ct. 2:802)	
134	14-22 [Replace "Exhibit 17" with Def. Ex.]	Lack of Authentication (Va. R. S. Ct. 2:901)	
135	1-2 and 6-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Authentication (Va. R. S. Ct. 2:901); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	135:3-4
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138	1-2 and 4-5	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	138:6-8
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January 21, 2022**

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40	1-2	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks foundation/personal knowledge, speculation (Va. R. S. Ct. 2:602)	40:13-15
41	16-20	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	
42	13-16	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	
43	6-8	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	
47	15 – 17 and 20-22	Lacks foundation, calls for speculation (Va. R. S. Ct. 2:602), relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), improper character evidence (Va. R. S. Ct. 2:404)	47:18-19
48	1-3, 5-9 and 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	
49	1 (from second “that”) - 2 11 (from second “I” – 19)	Improper character evidence (Va. R. S. Ct. 2:404), vague, ambiguous, lacks foundation and personal knowledge, calls for	45:1-15 49:3-9 49:20-22 50:1-2

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		speculation (Va. R. S. Ct. 2:602) as the question is based on an email which the witness had never seen	
50	3 (from "in") – 7 11 (from "in") – 13 16-17 18 (from "in") – 20	All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge/calls for speculation (Va. R. S. Ct. 2:602), improper character evidence (Va. R. S. Ct. 2:404) Lines 3-7: strike as nonresponsive Lines 11-13: assumes facts not in evidence, vague, ambiguous	50:8-10 50:14-15
51	2	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), improper character evidence (Va. R. S. Ct. 2:404)	
54	2-9 [Replace "Blaustein Exhibit 2" with "Def. Ex. "]		
55	2-7 and 13-22	Lines 13-22: hearsay (Va. R. S. Ct. 2:802), relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	
56	1-2 13 (from second "this is") - 20	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	
59	3-7	Relevance (Va. R. S. Ct. 2:402)	
60	4 (from second "what") – 7 12-21	Lines 4-7: relevance (Va. R. S. Ct. 2:402) Lines 12-14: relevance	60:22 – 61:15

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		(Va. R. S. Ct. 2:402), speculation (Va. R. S. Ct. 2:602) Lines 15-21: hearsay (2:802), lacks personal knowledge, speculation (Va. R. S. Ct. 2:602)	
62	17-18	Assumes facts not in evidence, vague, ambiguous	62:19-20
63	1-6, 20 (from "could") – 22		
64	1 2 (from second "what") – 4 5 (from second "What") – 9 17-22 [Replace "Blaustein 2" with "Def. Ex. "]	Improper character evidence (Va. R. S. Ct. 2:404), lacks foundation and personal knowledge, speculation (Va. R. S. Ct. 2:602)	
65	1-4 and 14 (from "And") - 22		
66	14 – 22 [Replace "Blaustein Exhibit 3" with "Def. Ex. "]		
67	1-2 3 (from second "is") – 21 22 from ("did")		
68	1-3 6 (from "And") – 10 12 (from "TC") – 13		
69	5-22	Lines 5-20: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	
70	1-4 and 15-20		
71	4 (from "do") – 7 9-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	71:8
72	1 2 (from "And") – 12 13 (from "And") – 21 22 (from "And")	Lines 8-12, 17-21: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
73	1-6 7 (from "And") – 10 12-22	Lines 7-10: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	
74	4-12 13 (from "And") – 18		
75	3-18	Lines 3-5: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403) Lines 15-20: lack of personal knowledge / speculation (Va. R. S. Ct. 2:602)	75:19-22 76:1
76	2-4 and 13-21	Lines 2-4: lack of personal knowledge / speculation (Va. R. S. Ct. 2:602) Lines 13-18: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	
77	7-9 18 (from "Does") – 22		
78	1 (from "does") – 9		
79	1-13 [Replace "Blaustein Exhibit 3" with "Def. Ex. "] 17-22		
80	1-5 6 (from "when") – 10 11 (from second "did") – 13 14 (from "were") - 22	Lines 6-13: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403) Lines 18-22: document speaks for itself	81:1-2
81	6 18-22 [Replace "Exhibit 4 to your deposition" with "Def. Ex. "]	Lines 18-22: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
82	1-6 7 (from second "she")	Lines 1-2: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R.	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
83	2-7 and 14-22	Lines 14-22: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403) Lines 14-18: hearsay (Va. R. S. Ct. 2:802)	
84	1-5 and 15-17	Lines 1-5: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), calls for expert testimony	
85	8 (from "in") – 10 and 15 (from "I") -22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), calls for expert testimony, asked and answered	85:11-15
86	1-4 and 6-17	All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), calls for expert testimony Lines 6-17: improper opinion / hypothetical (Va. R. S. Ct. 2:701), lacks personal knowledge/speculation (Va. R. S. Ct. 2:602), relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	
89	5 (from "and") – 8 9 (from second "this") – 12 13 (from "that's") – 20 22	All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403) Lines 9-16: lacks foundation / personal knowledge (Va. R. S. Ct. 2:602)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
90	1-8 9 (from second "I") 10 (from "do") – 15 20 (from second "do you") -22	All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	90:16-19
91	1-14, and 6-11 12 (from "what's") 15-22	All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403) Lines 12, 15: hearsay (Va. R. S. Ct. 2:802), lacks personal knowledge, speculation (Va. R. S. Ct. 2:602) Lines 16-20: lacks personal knowledge, speculation (Va. R. S. Ct. 2:602) Lines 21-22: calls for expert testimony	91:13-14
92	1-10	Lines 1-4: lacks personal knowledge / speculation (Va. R. S. Ct. 2:602) All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
93	6 (from "And") – 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
94	1 7-18 20-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
95	1-22	Relevance (Va. R. S. Ct. 2:402), unfair	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
96	1-8 9 (from "and you") – 13	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
97	10-22 [Replace "Exhibit 5 to your deposition" with "Def. Ex. "]	Lines 17-22: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
98	1-2 and 4-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
99	1-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
100	3-16 and 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
101	1-19	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	
102	15-21	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	
103	18-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct.	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		2:403), hearsay (Va. R. S. Ct. 2:802)	
104	1-7 12 (from "And") – 17	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
105	7-16	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
106	3 (from "Do") – 19	All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802) Lines 17-19: assumes facts not in evidence, lacks personal knowledge (Va. R. S. Ct. 2:602), argumentative, leading	106:20-22
107	1-4, 6-7, 9-13 and 15-17	All lines: Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks foundation / personal knowledge (Va. R. S. Ct. 2:602) Lines 6-7, 9-13, 15-17: assumes facts not in evidence	107:8 107:14
108	19-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
109	1-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
110	1-3		
111	11-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
112	1-17	All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403) Lines 7 – 17: needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
113	6-22	All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404) Lines 6-10: needlessly cumulative (Va. R. S. Ct. 2.403)	
114	1-22	All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2;404) Lines 8-14: needlessly cumulative Lines 18-22: hearsay (Va. R. S. Ct. 2:802)	
115	1-10 and 15 (from “And”) – 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	
116	1-17	Relevance (Va. R. S. Ct. 2:402)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Lines 15-17: lacks personal knowledge, speculation (Va. R. S. Ct. 2:602)	
117	9 (from "Do") – 19	Lines 9-13: lacks personal knowledge, speculation (Va. R. S. Ct. 2:602)	
120	5 (from "did Mr. Depp") – 8 9 ("did") – 13		
121	1-3 [Replace "Exhibit 9 to your deposition" with "Def. Ex. "] 8-9 14-17		
123	9-20 [Replace "Blaustein Exhibit 9 to your deposition" with "Def. Ex. "]		
124	18 (from "And") – 20		
126	13 (from "in") – 19		126:20-22
127	6 (from "you") – 8 18-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
128	1-2 4-19 and 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
129	1-15	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
131	12 (from "Now") – 15 [Replace "Blaustein 10" with "Def. Ex. "]	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		knowledge / speculation (Va. R. S. Ct. 2:602)	
132	7-17	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 132:18-21
133	1 (from "what") – 5 9-13 14 (from second "what") – 20 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 133:6-8
134	1-3 11 (from "If") – 13	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
135	7 (from second "what's") – 8 18 (from "And") – 20	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 135:21 – 136:9
136	5-9 20-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
137	1-11 12 (from "what other") – 18 19 (from "any other") – 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	
138	1-4 5 (from "and do") – 10 13-14 17-18 20-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 138:8-12 138:15-16, 19

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
139	1-7 and 20-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
140	1, 3-11 and 13-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
141	1-9 12 (from "as a") – 14 18-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 141:10-11
142	1 (through "to") 2 (from "himself") 3-6 10-11 13-15 17-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
143	1 (from "Now") – 4 (through "Yeah") [Replace "Blaustein 12" with "Def. Ex. "] 17 (from "And") – 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
144	1-3 15 (from "And") -22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
145	17-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
146	1-6 and 20-22	Relevance (Va. R. S. Ct. 2:402), unfair	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	
147	1, 3-5, 7-9, 11-19, and 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
148	1-5	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
149	14 (from "I'm") -22 [Replace "Blaustein 13" with "Def. Ex. "]	Lines: 18-22: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
150	3-19	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
151	15 (from second "and then") – 18 and 20-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
152	1-2, 7-9, 11-13, 15-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 152:3, 5
153	1 (from second "and") 3-15 17-19	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct.	126:1-4

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
	20-22	2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	
154	1-3, 5-11 and 14-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602) Lines 5-8: assumes facts not in evidence	126:1-4
155	1-3 [Replace "Blaustein 14" with "Def. Ex. "] 9 12-15 18-19	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 155:16-17 155:20-22 – 156:1
156	2 (from "The") – 4 8 (from "And") – 10 11 (from second "were") – 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 156:5-7
157	1-5 6 (From "what did") – 14 16 17 (from "Who") - 19	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 157:21- 158:7
159	4 (from "Turning") – 6 [Replace "Blaustein 15" with "Def. Ex. "] 13 (from "and what") – 18	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602) Lines 15-18: improper character evidence (Va. R. S. Ct. 2:404)	126:1-4 159:19-22
160	2-3, 5-8 9 (from "Do") – 14 16-17, 19-21	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal	126:1-4

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		knowledge / speculation (Va. R. S. Ct. 2:602)	
161	1 (from second "every day") – 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
162	1-7 and 9-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
163	1-20	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 163:21-22
164	1-6 and 19 (from "Next") -20	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
165	2-4 and 6-12	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 165:1, 5 165:13-21 166:4-11
166	17 (from "then") – 18 10-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
167	1, 3-5, 7-9 10 (from "Mr. Depp") – 18 19 (from "did he") – 21	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
168	3 (from "Turn") – 18 [Replace "Blaustein 16" with "Def. Ex. "] 20-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
169	1, 3, 6-20 and 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602), calls for expert testimony, improper opinion	126:1-4
170	1 (from "And") – 4, 6-10, 12-14 and 16	All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602) Lines 3-12: calls for expert testimony, improper opinion	126:1-4
171	13 (From "The") – 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
172	1, 11-12, 14-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
173	1-6 7 (from "and what does") – 10 11-19	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 173:20-22

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
174	2-15 and 17-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
175	1-6 and 8	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
176	1-16	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602) Incomplete designation that begins in the middle of answer.	126:1-4
177	1 (from "Turning") – 14 (through "perhaps")	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 177:17-21 178:17-19
178	3 – 12 and 20-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
179	1-6 and 13 (from "What's") -22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
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182	3-17	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 182:18 – 183:1
183	16 (From “Turning”) – 22 [Replace “Blaustein 148 with “Def. Ex. “]	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	
184	1-3 4 (from second “you”) – 21	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
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186	1-3 5 (from “relationship”) – 12 14-15 16-22	All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602) Lines 7-12: improper character evidence (Va. R. S. Ct. 2:404)	126:1-4
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189	1-8 and 20-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
190	3-7, 10-14	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4 190:1-2
191	1 (from "Turning") – 7 [Replace "Blaustein 19" with "Def. Ex. "]		
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193	1-9	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
195	5 (from "And") – 22	All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602) Line 22: improper character evidence (Va. R. S. Ct. 2:404)	126:1-4
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197	1 (from "what's") – 16 18-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602)	126:1-4
198	1-6, 8-12, 20-22	All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602). Lines 1-3: improper character evidence (Va. R. S. Ct. 2:404)	126:1-4
199	1-2, 4-13	All lines: relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), lacks personal knowledge / speculation (Va. R. S. Ct. 2:602) Lines 9-13: improper character evidence (Va. R. S. Ct. 2:404)	126:1-4

**Deposition of Jacob Bloom, Esq.
March 2, 2022**

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22	1-16 [Replace "Exhibit No. 3" with Def Ex]	Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	
23	1 and 3 12 (from "Do") – 15		23:16-18
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33	9-11 and 17	Relevance (Va. R. S. Ct. 2:402); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Leading	33:12-16
34	3-5 and 13-22	Relevance (Va. R. S. Ct. 2:402); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	34:6-8
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38	15-16 [Replace "Deposition Exhibit No. 5" with Def Ex] 18 (from "This") – 22		
39	1-6, 9-12 and 15-20 [Replace "Deposition Exhibit No. 5" with Def Ex]	Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	39:7-8, 39:13-14, 39:21-22
40	1-11 and 13-22	Hearsay (Va. R. S. Ct. 2:802); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
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44	5-22	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	45:2-8
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47	8-22 [Replace "Exhibit No. 6" with Def Ex]	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802)	
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50	6-11 and 14-22	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	51:2
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54	9-22 [Replace "Deposition Exhibit No. 7" with Def Ex]	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802)	
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56	1-4, 6-10, 13-16 and 18-20	Relevance (Va. R. S. Ct. 2:402); Vague & Ambiguous	56:5, 56:11-12, 56:21-22
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60	1-9 and 12-22	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	61:2-5, 61:10-12
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66	1-3, 5 and 9-22	Hearsay (Va. R. S. Ct. 2:802); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	66:4, 66:6-7
67	1-22	Hearsay (Va. R. S. Ct. 2:802); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
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**Deposition of Christian Carino
January 19, 2021**

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32	2-5 6 (from "when do") – 10	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
34	19-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
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71	1-4, 7-14 and 21-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Vague & Ambiguous as to time	
72	1-11	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
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85	9-20	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
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163	11 (from "What") – 16 18-22		
164	1, 16-17 and 22		164:18-19
165	1-12 and 21-22		165:13-16
166	1-2		
167	19-22		
168	1-11 and 14-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
169	1-8	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
170	16-18	Compound; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	170:19-20
171	4-8	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	

Deposition of Christian Carino, Volume 2
March 11, 2022

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
213	16 (from "So") – 18		
215	3-7 and 10	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
217	10 [Replace "Exhibit 16" with Def Ex 1024] 15 (from "you'll") – 19		
218	12-14 15 (from "And") - 18		
219	6 (from "And") – 11 and 18-19		
220	7-13 and 16 18 (from "I") – 22		
221	1, 4 and 6-8		
228	7 [Replace "Exhibit 17" with Def Ex 1022] 10 (from "You'll") – 13 (through "her")		
229	7 and 17-22		
230	1-4 and 19-22		
231	1 and 20-22		
232	1-7		
235	18-22		
236	1-2		
266	16-17 and 20		
350	5-11	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	

**Deposition of Candie Davidson-Goldbronn,
Designated Representative of Children’s Hospital Los Angeles
March 30, 2021**

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
13	3-4 (“Well, good morning, Ms. Goldbronn” only)		
20	22-25		
21	24-25		
22	1-4 and 10-23		
23	1-3 7 (from “So”) – 20 25		
24	1-19		
25	10-12, 20-23 and 25		
26	1 and 5 24 (from “So”) – 25	26:1 and 5: Incomplete.	26:2-4
27	1-9, 14-15 and 20-23		27:16-19
40	6 (from “Are”) – 8 12		40:9-11
41	6-7, 11-13, 15-16 and 23-25		41:8-10 41:17-22
42	14 (from “Are”) – 18 22	42:14-18 and 22: Incomplete and unintelligible.	42:19-22
43	19-20 and 24-25		43:21-23
44	2-4 and 8-11		44:5-7 44:15-21
45	8 (from “Ms.”) – 12 [Replace “Exhibit 3” with Def Ex] 16-21		45:5-46:5
46	3-4		45:5-46:5
49	21-23 and 25		
50	6 (from “Do”) – 9 13	Objection. Relevance. Va. R. S. Ct. 2 :402. Lack of Foundation/Personal Knowledge. Va. R. S. Ct. 2:602.	
67	13-18, 23 and 25	Objection. Relevance. Va. R. S. Ct. 2 :402. Lack of Foundation/Personal Knowledge. Va. R. S. Ct. 2:602.	67:19-22

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
68	1-2 and 6	Objection. Lack of Foundation/Personal Knowledge. Va. R. S. Ct. 2:602.	68:3-5 68:8-15
69	17 (from "In") – 20 24	Objection. Lack of Foundation/Personal Knowledge. Va. R. S. Ct. 2:602.	69:21-23
73	5 (from "In") – 10	Objection. Lack of Foundation/Personal Knowledge. Va. R. S. Ct. 2:602.	
83	21-23 [Referring to Deposition Exhibit 9; Replace with Def Ex]		83:15-23
91	5 (from "Do") – 11 15-16 and 18-22		91:5-22
92	10-14 and 18-19 21 (from "And") – 25		92:10-93:10
93	4 and 8-10	Objection. Incomplete/Unintelligible. Omits question.	92:10-93:10
96	2-25		
97	1-13 and 17 19 (from "Does") – 21 25		97:22-24
98	1-2		
102	10-25 [Referring to Deposition Exhibit 11; Replace with Def Ex]		
103	1-3, 7-8 and 20-25 [Referring to Depp 16; Replace with Def Ex]		103:4-6
104	1-20 and 24		104:21-23
105	2 (from "The") – 5 9-10 and 12-19	105:12-19: Objection, unintelligible, incomplete. The excerpted text includes the question but not the answer.	106:14-21
106	14 (from "when you say") – 25		
107	1-7, 15-17 and 21-22		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
109	5-8 9 (from "Now") – 13		109:3-16
113	5-20 and 25		113:21-24
114	2-5		
115	25 [Replace "Exhibit 14" with Def Ex]		
116	1-4 18 [Replace "Exhibit 15" with Def Ex] 22-25		
117	1-18 and 23-25		
118	1-14		118:15-119:10
119	11 (from "So between") – 14 23 (from "If") - 24		119:15-23
127	21-24 [Referring to Deposition Exhibit 16; Replace with Def Ex]		128:4-6
128	2-3 and 7-9		
135	21-24	Objection. Relevance. Va. R. S. Ct. 2 :402. Lack of Foundation/Personal Knowledge. Va. R. S. Ct. 2:602.	135:25-136:3
136	4 (from "Prior") – 6 8-10 and 18 21 (from "I'm") – 23 [Replace "Depp Exhibit Number 3" with Def Ex]	Objection. Relevance. Va. R. S. Ct. 2 :402. Lack of Foundation/Personal Knowledge. Va. R. S. Ct. 2:602.	136:11-17
137	9-11 and 19-20		
138	20-25	Incomplete. Omits response.	
139	2-3, 11-14, 16-19 and 25		139:2-25
140	1, 3-9, 14 and 23-25		140:10-13
141	7-9, 11-14, 22-23 and 25		141:1-6, 15-20
142	1-8 and 21-25		
143	3 and 5-24		
144	4-8, 11-18 and 20-21		
145	7 (from "So") – 23		145:24-25
146	12 (from "Let's") [Replace "2" with Def Ex] 14-21		146:22-24
147	2-4, 15 and 17-23		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
148	4-25	Objection to testimony and exhibit. Hearsay. Va. R. S. Ct. 2:802. Relevance. Va. R. S. Ct. 2 :402. Lack of Foundation/Personal Knowledge. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	
149	1-8, 14-15 and 17-23	Relevance. Va. R. S. Ct. 2:402. Lack of Foundation/Personal Knowledge. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	149:9-12
150	12-15 and 23-25	Relevance. Va. R. S. Ct. 2:402.	150:16-21
151	1-2, 4-6 and 10	Relevance. Va. R. S. Ct. 2:402. Lack of Foundation/Personal Knowledge. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	151:7-9
152	23 (from second "I'm") – 24 [Replace "Exhibit Number 7" with Def Ex]		
153	4-9		
154	8-25 [Referring to Deposition Exhibit 18; Replace with Def Ex]	Objection. Hearsay. Va. R. S. Ct. 2:802. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602.	
155	1 (from "So") – 3 6-9, 11-12 and 21-24		155:4-5 155:13-14 155:18-19
156	2 (from "So") – 8 18-22		156:9-17.
157	14-17	Objection. Relevance. Hearsay. Va. R. S. Ct. 2:802.	157:18-24

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
158	18-20	Objection. Relevance. Hearsay. Va. R. S. Ct. 2:802. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602.	
160	6 (from "And") – 7 (through "19") [Replace "19" with Def Ex] 12-16 and 25		
161	1-7, 10-12, 14-18 and 22-25		161:8-9
162	1-4 and 19-22	Objection. Relevance. Hearsay. Va. R. S. Ct. 2:802. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602.	
163	5-8, 10-12, 14-16 and 22-25	Objection. Relevance. Hearsay. Va. R. S. Ct. 2:802. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602.	162:23-163:4
164	1-2 and 5-6 11 (from "we'll") [Replace "Number 20" with Def Ex] 14-15 and 17-25		164:3-4
165	1-10, 14-18 and 20-22		165:11-13 165:23-166:1
166	2-3, 5-9, 12 and 14-15		165:23-166:1 165:10-11
167	23-25 [Referring to Deposition Exhibit 21; Replace with Def Ex]		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
168	1-5 and 8-9 10 (“up my Exhibit Number” and “22” only) [Replace “22” with Def Ex] 14-20 and 23-24	168:3-4 and 168:14-24: Objection. Relevance. Va. R. S. Ct. 2:402. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602.	168:6-7 168:21-22
169	2-3, 6 and 21-24	169:2-6: Objection. Relevance. Va. R. S. Ct. 2:402. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. 169:21-24: Objection. Relevance. Va. R. S. Ct. 2:402. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Hearsay. Va. R. S. Ct. 2:802.	169:4-5 169:25-170:2
170	8-9 and 12-19	170:8-9 and 170 :12-19: Objection. Relevance. Va. R. S. Ct. 2:402. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Hearsay. Va. R. S. Ct. 2:802.	170:20-24
172	10-11	Objection. Incomplete/Unintelligible. Omits question. Relevance.	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
174	22 (from "There") – 24	Objection. Incomplete/Unintelligible. Omits question. Relevance. Va. R. S. Ct. 2:402. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602.	
175	4-7 and 10 13 (from "Has") – 15 22-23	Relevance. Va. R. S. Ct. 2:402. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602.	175:8-9 175:16-20

**Deposition of Dr. Connell Cowan
December 8, 2021**

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
10	7-11		
13	3-5, 6 (from "For") -22		
14	1-11 and 16-22	14:9-11: Objection. Lacks Foundation, Speculation. Va. R. S. Ct. 2:602. 14:16-22: Objection. Lacks Foundation, Speculation. Va. R. S. Ct. 2:602.	
15	6-11, 12 (from "Have") - 17	15:15-19: Objection. Lacks foundation, speculation. Va. R. S. Ct. 2:602. Improper, incomplete hypothetical.	15:18-19
17	22	17:22-18:1: Objection. Lacks foundation, speculation. Va. R. S. Ct. 2:602. Improper, incomplete hypothetical.	18:2

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
18	1, 3 4 (from "And") – 10 13-22	17:22-18:1: Objection. Lacks foundation, speculation. Va. R. S. Ct. 2:602. Improper, incomplete hypothetical. 18:9-13: Objection. Lacks foundation, speculation. Va. R. S. Ct. 2:602. Improper Opinion of Lay Witness. Va. R. S. Ct. 2:701, 2:702.	
19	1-3, 4 (from "And") – 9 10 (from "all") – 13 14 (from "You") - 22	Objection to 18:14-22:20: Relevance. Va. R. S. Ct. 2:402. Improper Opinion of Lay Witness. Va. R. S. Ct. 2:701, 2:702.	
20	1-22	Objection to 18:14-22:20: Relevance. Va. R. S. Ct. 2:402. Improper Opinion of Lay Witness. Va. R. S. Ct. 2:701, 2:702.	
21	1-2, 3 (from "you") 16 17 (from "What") - 22	Objection to 18:14-22:20: Relevance. Va. R. S. Ct. 2:402. Improper Opinion of Lay Witness. Va. R. S. Ct. 2:701, 2:702.	
22	1-8, 10-14, 15 (from "And") – 20 21 (from "And") - 22	Objection to 18:14-22:20: Relevance. Va. R. S. Ct. 2:402. Improper Opinion of Lay Witness. Va. R. S. Ct. 2:701, 2:702.	
23	1-3, 5-17 18 (from "Have") -20		
26	14-22		
27	1		
28	3-4 15 (from "And") -17		28:5-14
30	13 (from "And") -16 17 (from "What") -22		
31	1-3, 13-14, 17-19, and 22	Objection. Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal	31:15-16; 31:20-21

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Knowledge. (Va. R. S. Ct. 2:602.)	
32	1-6, 11-13, 16-19 and 22	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.)	
33	1-4 and 7 8 (from "in") -11 14 (from "I") -16 22	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.)	
34	1-3, 10-11, 15 16 (from "And") -19, and 22	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.)	
34	10-11, 15	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.)	34:12-14
35	10 (from "in") -12 15-19, and 22	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Relevance. (Va. R. S. Ct. 2:402.)	35:13-14 35:20-21
36	1-7 and 10-11	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Relevance. (Va. R. S. Ct. 2:402.)	36:8-9
37	4 (from "Did") – 6, and 9	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct.	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		2:602.) Relevance. (Va. R. S. Ct. 2:402.)	
40	3 (from "in") - 4 8-22	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Relevance. (Va. R. S. Ct. 2:402.)	
41	1-4	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.)	
41	14-18 (Replace "Cowan 2" with Def's Ex) 19 (from "And") - 22		
42	1, 2 (from "And") -5 6 (from "And") - 7 9-11, 12 (from "And") - 22	42:12-21: Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Relevance. (Va. R. S. Ct. 2:402.)	
43	1-3, 6-8 9 (from "So") - 10 13, 14 (from "And") - 22	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.)	43:4-5 43:11-12
44	1-2 and 5-22	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.)	44:3-4
45	1, 4-8, and 12-19	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.)	45:2-3 45:9-11 45:20-21

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
46	1-2, 4, and 16-22	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.)	46:3
47	1-3, 6-8 9 (from "You") - 18 19 (from "And") - 22	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.)	47:4-5
48	1-8 and 11-22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.)	48:9-10
49	5-16, 17 (from "in") - 20	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) 49:17-20: Improper Opinion of a Lay Witness. (Va. R. S. Ct. 2:701.)	49:1-2
50	1, 2 (from "And") - 6 10-22 (Replace "Cowan 2" with Def's Ex)	50:1: Improper Opinion of a Lay Witness. (Va. R. S. Ct. 2:701.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	
51	7-16, 17 (from "So") - 20 21 (from "And") - 22 [Referring to Def's Ex] (Cowan 3)	Lack of Authentication as to any modification of the exhibit. (Va. R. S. Ct. 2:901.)	
52	1-22	52:14-22: Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R.	53:1-2

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		S. Ct. 2:802.) Lack of Authentication as to any modification of the exhibit. (Va. R. S. Ct. 2:901.)	
53	16 (from "Where") -22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.) Lack of Authentication as to any modification of the exhibit. (Va. R. S. Ct. 2:901.)	
54	16-22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.) Lack of Authentication as to any modification of the exhibit. (Va. R. S. Ct. 2:901.)	
55	1-16, 18-22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.) Lack of Authentication as to any modification of the exhibit. (Va. R. S. Ct. 2:901.)	
56	1-6	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.) Lack of Authentication as to any modification of the exhibit. (Va. R. S. Ct. 2:901.)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
57	9-10, 12-22 (Replace "Cowan 4" with Def's Ex)	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	
58	1-21	Hearsay. (Va. R. S. Ct. 2:802.)	
59	1-22		
60	1-5 6 (from second "how") – 7 10-22	60:6-7: Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	60:8-9
61	8-11, 12 (from second "she") (Replace "Cowan 5" with Def's Ex)		
62	2 (from "If") -22		
63	1-19		
64	13-22 (Replace "Cowan 6" with Def's Ex)		
65	1-8, 9 (from "Where") - 22		66:1-3
66	4-19 and 21-22		
67	1-11 and 14-22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	
68	1-3, 14-15 and 18-20	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	68:4-5
70	8-10 and 14-20	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	70:11-13 69:8-70:4
72	20-22 (Replace "Cowan 7" with Def's Ex)		
73	1-13 14 (from second "I don't") - 15 17-20	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va.	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	
74	1-11	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	
76	2-6, 10-20 (Replace "Cowan 8" with Def's Ex)	76:17-77:12: Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	76:21-22 77:11-12
77	1-10 and 14-22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	76:21-22 77:11-12
78	1-9 and 14-19	78:14-19: Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.) Improper Opinion. (Va. R. S. Ct. 2:602).	78:20-21
79	1 (from second "then") 9 10 (from second "was") - 12 14-22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.) Improper Opinion. (Va. R. S. Ct. 2:602). 79:10-12: Objection to form, compound.	79:13
80	1-8 and 13-22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.) Improper Opinion. (Va. R. S. Ct. 2:602).	163:20-165:4

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Lack of Authentication as to any modification of the exhibit. (Va. R. S. Ct. 2:901.)	
81	1-4 and 8	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.) Improper Opinion. (Va. R. S. Ct. 2:602.)	
82	17 (from second "in") -19 and 22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.) Improper Opinion. (Va. R. S. Ct. 2:602.) Objection to form: Leading.	82:20-21
83	1-8 15 (from "Dr.") -21 (Replace "Cowan 9" with Def's Ex)		
84	5 (from "And") – 13 14 (from "And") 18 19 (from "what") -22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	
85	1-6 and 16-22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.) Objection to form: Leading.	86:1-3
86	5-14 and 22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va.	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	
87	1-22 (Replace "Cowan 10" with Def's Ex)	Hearsay. (Va. R. S. Ct. 2:802.)	
88	1-3, 7-22		
89	1-14, 16-22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.)	
90	1-22	90:1-20: Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.)	
91	1-14 and 17-22	91:5-5-9; 91:13-18: Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.)	91:15-16
94	1-6		
95	11-22 (Replace "Cowan 10" with Def's Ex)	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	
96	1-19	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	
97	3-19 and 22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	97:20-21
98	1-9 17-22 (Replace "Cowan 11" with Ex)	98:1-9: Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	163:20-165:4

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Lack of Authentication as to modification of the document. (Va. R. S. Ct. 2:901.)	
99	1-11 and 17-22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	
100	6-14 and 22		
101	1-22 (Replace "Cowan 12" with Ex)		
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105	4-22	105:4-8: Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	
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116	1-4 and 15-22 (Replace "Cowan 16" with Ex)	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Relevance. (Va. R. S. Ct. 2:402.)	116:5-6
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118	1-4 and 7-22	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Relevance. (Va. R. S. Ct. 2:402.)	
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142	1-11	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Improper Opinion. (Va. R. S. Ct. 2:701.)	
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149	1-22	Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Hearsay. (Va. R. S. Ct. 2:802.)	
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300	1-22	Relevance. (Va. R. S. Ct. 2:402.) Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Improper Opinion. (Va. R. S. Ct. 2:701.)	
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305	1-17 and 20-22	Hearsay. (Va. R. S. Ct. 2:802.) Lack of Foundation; Speculation; Lack of Personal Knowledge. (Va. R. S. Ct. 2:602.) Improper Opinion. (Va. R. S. Ct. 2:701.)	
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**Deposition of Stephen Deuters
February 24, 2022**

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47	2-3, 7-10, 13-15, 17-18, 20 and 22	Vague & Ambiguous as to time; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	47:11-12, 47:19
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49	1-2 and 4 12 (from "can") – 13 [Replace "Depp 11242" (Depo Ex 2) with Def Ex] 22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	49:3
50	1-11 and 22 (from "Do")	Lack of Authentication (Va. R. S. Ct. 2:901)	
51	1-2, 7-15 and 19-21	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	51:3-4, 51:16-17. 51:22
52	11-19	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal	

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54	1-5, 8, 10 and 12-18	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	54:6-7, 54:11, 54:20-55:1
55	2-4, 6-8, 12-14 and 18-19 [Replace "Depp 11244" (Depo Ex 3) with Def Ex]	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	55:9-11
56	9-22	Hearsay (Va. R. S. Ct. 2:802)	
57	1-10, 13-14 and 17-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	57:11, 57:15-16
58	1-2, 4-6, 9-12, 14-17 and 20-21	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701)	58:7-8, 58:18-19
59	1 and 4-10 [Replace "H30.2" (Depo Ex 4) with Def Ex]	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	59:2-3
60	4-7, 10-12 and 14-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	60:8-9
61	1-8, 12-15, 17 and 20-22	Relevance (Va. R. S. Ct. 2:402); Compound; Vague & ambiguous as	61:9-11, 61:18-19

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62	2-22	Hearsay (Va. R. S. Ct. 2:802); Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602	
63	4-9, 11-13, 16-17 and 19-22	Hearsay (Va. R. S. Ct. 2:802); Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602	63:14-15
64	1-14 and 17-22 [Replace "Depp" with "Exhibit"; Replace with Def Ex]	Hearsay (Va. R. S. Ct. 2:802); Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602	64:15-16
65	1 [Replace "11296" with Def Ex] (Referring to Deposition Exhibit 5) 7-10, 12-13 and 15-22	Hearsay (Va. R. S. Ct. 2:802); Vague & Ambiguous; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602	65:11, 66:1-2
66	3-5, 7-9, 14-16, 18-19 and 22	Hearsay (Va. R. S. Ct. 2:802); Vague & Ambiguous; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602	66:10-13, 66:20-21
67	1-2 3 (from "can") – 5 [Replace "Exhibit 1" with Def Ex] 7-17	Hearsay (Va. R. S. Ct. 2:802); Vague & Ambiguous; Lack of Foundation, Speculation, Lack of Personal	

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69	2-12, 15, 17-18 and 20-22	Relevance (Va. R. S. Ct. 2:402); Vague & Ambiguous as to “hard”; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	69:13-14, 70:1-2
70	3-5, 7-9, 11, 13-14, 16 and 18-20	Relevance (Va. R. S. Ct. 2:402); Vague & Ambiguous as to “hard”; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	70:10, 70:15, 70:21-22
71	1-3, 5-9, 13-14 15-16 (through “please”) [Replace “Depp 11312” with Def Ex]	Compound; Relevance (Va. R. S. Ct. 2:402); Vague & Ambiguous as to “hard”; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	71:10-12
72	5-12 and 16-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	72:13-14
73	1-3 7 (from “can”) – 9 [Replace “Exhibit 1” with Def Ex] 11-22	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Vague &	73:4-5

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76	1-2 and 10-14	Vague & Ambiguous; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602	76:5-7
77	9-10 [Replace "ALH 17970" with Def Ex] (Referring to Deposition Exhibit 7)		
78	2-3 and 5-20	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602	78:21-22
79	1-4, 6-8, 18-20 and 22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602	79:9-11, 79:16-17
80	1-5, 8-10, 12-16 20-22 [Replace "ALH 17949" with Def Ex] (Referring to Deposition Exhibit 8)	Compound; Vague & Ambiguous; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602	80:6-7, 80:17-19
81	1, 6-8, 11-13, 15-17 and 20-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602	81:9-10, 81:18-19

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84	2-6, 9-10, 12-15, 19-20 and 22	Compound; Vague & Ambiguous as to "uncommon" and "drunken- or drug-induced stupors"; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602	84:7-8, 84:16-18
85	1 and 4-7 8 (from "can") – 9 [Replace "ALH 17968-69" with Def Ex] (Depo Exhibit 9) 17-19 and 22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602	85:2-3, 85:20-21
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88	6-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602	
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91	6-19	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602;	
92	1-2, 4, 6, 9, 11-13, 16-17 and 19-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602; Vague & Ambiguous as to "best self"	92:3, 92:7-8, 92:14-15
93	1-5, 8-11, 13-17 and 20-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602; Vague & Ambiguous; Compound	93:6-7, 93:18-19
94	2-3, 6-9, 11-18 and 21-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602; Vague & Ambiguous as to "normal"	94:4-5, 94:19-20
95	7-15 and 18-21	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602;	95:16-17
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106	1-6, 8-11, 13-14, 16-17 and 20-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602; Vague & Ambiguous	106:12, 106:18-19
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109	1-2 [Referring to Deposition Exhibit No. 10 recording; Replace with Def Ex] 13-15 and 19-21	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602; Vague & Ambiguous	109:22-110:1
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113	1-2, 5-9, 11-13 and 17- 18	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602; Vague & Ambiguous	113:3-4, 113:14-16
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115	4-6, 8-10, 13-15 and 18- 20 [Replace "Exhibit 1" with Def Ex] 22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602; Vague & Ambiguous	115:11-12
116	1-13, 17-18 and 20-22	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602	116:14-16
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120	1-9, 13-17 and 19-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602; Vague & Ambiguous; Compound	120:10-12
121	1, 4 and 20-21	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602;	121:2-3, 121:22
122	1-3, 5-9, 12-16, 18 and 20-21	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602;	122:10-11, 122:19
123	1-2, 5-7, 9-14, 17-18 and 20-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602; Vague and Ambiguous as to "his conduct"	123:3-4, 122:15-16, 124:7-17
124	1-3 [Replace "ALH 17950 to 17598" with Def Ex] (Referring to Depo Ex 11) 5 (from "you") – 20		

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136	1, 3-11, 14-15 and 17-19	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602; Vague & Ambiguous as to "felt bad"	136:12-13, 136:20-21
137	1-9, 12-13 and 15-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602; Vague & Ambiguous as to "done wrong"	137:10-11
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141	1, 3-17 and 21-22		
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147	6 (through "document") [Replace "document" with Def Ex] (Depo Exhibit 12) 10 and 16-22		
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152	2-6	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
153	1-11, 16-18 and 20-22 [Replace "Deuters 2853" with Def Ex] (Depo Ex. 13)	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602; Vague & Ambiguous as to "problem"; Relevance (Va. R. S. Ct. 2:402);	153:12-13, 153:19
154	4-5 and 9-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
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156	1-8 [Replace "Deuters 2887" with Def Ex] (Deposition Exhibit 14) 12-13, 15-17, 19-20 and 22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	156:18
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159	1-3, 6, 8-9, 11, and 15-16 [Referring to Depo Exhibit 15; Replace with Def Ex]	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	159:4-5, 159:10
160	1-2, 5-7 and 11-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	160:8-9
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169	1-2 [Replace "Exhibit 1" with Def Ex] 5-6 and 8-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S.	

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171	1-2, 5-8, 10-17 and 20-22 [Replace "Deuters 2884" with Def Ex] (Deposition Exhibit 16)	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	171:3-4
172	9-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
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176	1 and 3-8 [Replace "Depp 11297" with Def Ex] (Deposition Exhibit 17) 14-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	176:2
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181	1-20 and 22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
182	1-10, 15-20 and 22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	182:11
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184	1-2, 5-9, 11-18 and 22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701)	184:3-4, 184:19-21
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189	1 and 3-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
190	1-5 and 8-11 [Replace "Depp 11300" with Def Ex] (Deposition Exhibit 18) 17-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	190:6-7
191	1-5, 8-13 and 15-19	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Vague & Ambiguous	191:6-7. 191:20-22
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200	1-3 and 5-21	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Character Evidence (Va. R. S. Ct. 2:404)	200:22
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203	1-2 and 5-8 [Replace "Depp 11244" with Def Ex] (Deposition Exhibit 21) 14 (through "top") 16-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Character Evidence (Va. R. S. Ct. 2:404)	203:3-4
204	1-5 [Replace "Deuters 2853" with Def Ex] (Deposition Exhibit 22) 9-10 and 12-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
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207	1-4 7 (from "What's") – 18 [Replace "Depp 11414" with Def Ex] (Depo Exhibit 24]	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
208	1-12 and 14-18 [Replace "Depp 11253" with Def Ex] (Depo Exhibit 25) 22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	208:13
209	1 and 3-17	Hearsay (Va. R. S. Ct. 2:802); Relevance (Va. R. S. Ct. 2:402)	
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217	1-3, 5-7, 9-10, 12, 15 and 17-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	217:4, 217:11, 217:13-14
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219	2-3, 5-7, 9-12, 14-17 and 22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Compound	219:8, 219:18-19
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14	1-6	13:7-14:6: Objection. Relevance. Va. R. S. Ct. 2:402.	
15	7-13 [Replace "Defendant's Exhibit No. 22" with Def Ex]14 (from "if") -22	Objection. Relevance. Va. R. S. Ct. 2 :402. Lack of Foundation/Personal Knowledge. Va. R. S. Ct. 2:602.	
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27	5-9 [Replace "Defendant's Exhibit No. 1" with Def Ex]12 (from "I'm") - 22	27:5-28:16: Objection. Relevance. Lacks Foundation/Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Hearsay. Va. R. S. Ct. 2:802. Lack of Authentication. Va. R. S. Ct. 2:901.	
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51	3-22	Objection. Relevance. Va. R. S. Ct. 2:402. Speculation/Lack of Foundation/Personal Knowledge. Va. R. S. Ct. 2:602. Hearsay. Va. R. S. Ct. 2:901.	
52	1-21	Objection. Relevance. Va. R. S. Ct. 2:402. Speculation/Lack of Foundation/Personal Knowledge. Va. R. S. Ct. 2:602. Hearsay. Va. R. S. Ct. 2:901.	52:22-53:8
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56	1 2 (from “so”) – 6	Objection. Relevance. Va. R. S. Ct. 2:402.	

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70	1-22	70:3-22: Objection. Lack of Foundation, Lack of Personal Knowledge, Speculation as to the exhibit. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Hearsay. Va. R. S. Ct. 2:802. Relevance.	
71	1-2 3 (from "did") – 17 18 (from "And") – 22	71:18-22: Objection. Lack of Foundation, Lack of Personal Knowledge, Speculation as to the exhibit. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Hearsay. Va. R. S. Ct. 2:802. Relevance.	
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76	2 (from "And") – 13 and 15-19	Objection. Relevance. Lacks Foundation, Speculation. Va. R. S. Ct. 2:602.	
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79	1-4 5 (from "does") – 8 15-16 and 19-21	79:15-21: Lacks Foundation, Speculation. Va. R. S. Ct. 2:602.	
80	2-6 [Replace "Deposition Exhibit 3" with Def Ex] 7 (from "And") – 10 11 (from "that's") – 15 21-22	80:11-19: Objection. Lacks Foundation, Speculation. Va. R. S. Ct. 2:602.	80:16-19
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89	5 (from "Officer") – 15 [Replace "Deposition Exhibit 7" with Def Ex] 19-20	Objection. Lacks Foundation, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Assumes facts not in evidence. Relevance.	89:16-18
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96	1 and 3-8 20 [Replace "6" with Def Ex]	96:7-8: Objection. Hearsay. Va. R. S. Ct. 2:802.	
97	1-3 [Referring to Exhibit 6; Replace with Def Ex] 10-22	96:7-8: Objection. Hearsay. Va. R. S. Ct. 2:802. Lacks Foundation, Speculation. Va. R. S. Ct. 2:602.	
98	1-2 3 (from "so") – 5 6 (from "And") – 22	Objection. Hearsay. Va. R. S. Ct. 2:802. Lacks Foundation, Speculation. Va. R. S. Ct. 2:602.	
99	1-3 4 (from "And") – 7 11, 15-17 and 21-22	99:4-11: Objection. Hearsay. Va. R. S. Ct. 2:802. Lacks Foundation, Speculation. Va. R. S. Ct. 2:602. 99:15-17: Objection. Incomplete. Omits Question. Hearsay. Va. R. S. Ct. 2:802. Lacks	99:8-10 99:12 99:18-20

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102	2 [Replace "Defendant's Exhibit No. 5" with Def Ex] 4-15 [Replace "Defendant's Exhibit No. 5" with Def Ex] 17 (from "you") – 19 20 (from "What") – 21 22 (from And")		
103	1-2 3 (from "And") – 7 [Replace "Defendant's Exhibit No. 5" with Def Ex] 18 (from "how") – 21 22 (from "And")		
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109	12 [Replace "Defendant's Exhibit No. 4" with Def Ex] 14-22		
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111	4 (from "I'm") – 17 [Replace "Defendant's Exhibit 8" with Def Ex]	Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	
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113	4-5 [Replace "Defendant's Exhibit 9" with Def Ex] 11-13 and 15-22	113:4-13: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. 113:15-19: Objection. Relevance. Assumes facts not in evidence.	113:6-8

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		<p>Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.</p> <p>113:20-114:5: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.</p>	
114	1-2, 5, 10-13 and 19-22 [Replace "Defendant's Exhibit 11" with Def Ex]	<p>113:20-114:5: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.</p> <p>114:10-13: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.</p> <p>114:19-115:1: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S.</p>	114:3-7

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		Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	
115	1, 10-12 and 16-17 19 (from "you") – 22	<p>114:19-115:1: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.</p> <p>115:10-17: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.</p>	115:13-15
116	1-2 and 8 14-20 [Replace "Defendant's Exhibit 12" with Def Ex]	<p>116:1-8: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.</p> <p>116:14-20: Objection. No response to the question was given, as the question was re-asked on the following page. 114:19-115:1: Objection. Relevance. Assumes facts not in</p>	116:3-7

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		evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	
117	5-7, 11 and 13-22	Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	117:1 117:8-10
118	2-4, 8 and 10 17-20 [Replace "Deposition Exhibit 13" with Def Ex]	118:2-10: Objection. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. 118:17-20: Objection. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	118:5-7 118:21-119:1
119	2-7, 9-11 and 15-16 17 (from "you're") – 21	119:9-16: Objection. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of	119:12-14 119:22-120:3

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		<p>Authentication. Va. R. S. Ct. 2:901.</p> <p>119:18-120:6: Objection. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.</p>	
120	4-6 13-17 [Replace "Deposition Exhibit 14" with Def Ex] 21-22	120:13-121:3: Objection. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	120:18-20
121	1-3, 13-16 and 21-22	<p>121:1-3: Objection. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.</p> <p>121:13-22: Objection. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.</p>	121:17-20
122	2-4 5 (from "And") – 8	122:5-13: Objection. Assumes facts not in	122:9-12

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	13 20-22 [Replace “Defendant’s Exhibit 15” with Def Ex]	evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	
123	1-2, 7-9, 11-13, 17 and 20-22	As to all questions: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	123:14-18
124	4 8 (from “Officer”) – 12 17-20 and 22	As to all questions: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	124:1-3 124:13-16
125	1-3, 8-9, 11-14 and 19	As to all questions: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	125:4-7 125:15-18
126	4-8 [Replace “Defendant’s Exhibit 17” with Def Ex] 13-15 and 17-19	As to all questions: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of	126:9-12 126:20-22

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		Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	
127	2, 4-7 and 12 17-21 [Replace "Defendant's Exhibit 18" with Def Ex]	As to all questions: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	127:8-11 127:22-128:2
128	3-5, 7-9, 14 and 16-18	As to all questions: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	128:10-13 128:19-22
129	1 and 5-8 9 (from "Would") – 11 16-19 and 22	129:9-19: As to all questions: Objection. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Improper, Incomplete Hypothetical.	129:12-14
130	1 [Replace "Exhibit 1" with Def Ex] 4-9, 18-19 and 21-22	As to all questions: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge,	130:10-15

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		<p>Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Vague and Ambiguous. Calls for a Narrative. Hearsay. Va. R. S. Ct. 2:802.</p>	
131	1-22	<p>Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Vague and Ambiguous. Calls for a Narrative. Hearsay. Va. R. S. Ct. 2:802.</p>	
132	1 and 8-11	<p>132:1: As to all questions: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Vague and Ambiguous. Calls for a Narrative. Hearsay. Va. R. S. Ct. 2:802.</p> <p>132:8-11: As to all questions: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S.</p>	

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		Ct. 2:901. Vague and Ambiguous. Calls for a Narrative. Hearsay. Va. R. S. Ct. 2:802.	
133	1-2, 4-5 and 7-9 12 (from "and") – 14 18-20 and 22	Objection to the extent the questions refer to documents unauthenticated by the witness. As to all questions: Objection. Relevance. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Vague and Ambiguous. Calls for a Narrative. Hearsay. Va. R. S. Ct. 2:802.	133:6 133:15-17
134	1-3, 8, 10-11, 13-14 and 16-18	Objection to the extent the questions refer to documents unauthenticated by the witness. As to all questions: Objection. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Vague and Ambiguous. Calls for a Narrative. Hearsay. Va. R. S. Ct. 2:802.	134:4-7 134:12 134:19-22
135	1	Objection to the extent the questions refer to documents unauthenticated by the	

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		witness. As to all questions: Objection. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Vague and Ambiguous. Calls for a Narrative. Hearsay. Va. R. S. Ct. 2:802.	
136	14-16 and 21-22	Objection. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Vague and Ambiguous. Calls for a Narrative. Hearsay. Va. R. S. Ct. 2:802.	
157	6-9 and 12	Objection. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Leading.	157:10-11
158	1-4, 7-12 and 14 16 (from "So") – 22	Objection to all questions. Leading. 158:21-159:3: Objection. Leading. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602.	159:4-6
159	1-3, 7-8 and 10-22	As to all questions: Objection. Leading.	159:4-6

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		Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602.	
160	1-3, 7-8, 10-12, 16-17 and 19-22	As to all questions: Objection. Leading. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602.	160:4-6 160:13-15
161	1-3, 6-8 and 10-11 12 (from "You") – 22	As to all questions: Objection. Leading. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602.	161:4-5
162	1-3, 6-7, 9-12 and 14	As to all questions: Objection. Leading. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602.	162:4-5
163	15-20	Objection. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602.	163:21-164:2
164	7 10 (from "If") – 14 19-21	Objection. Argumentative. Incomplete Hypothetical. Assumes facts not in evidence. Lacks Foundation, Lack of	164:8 164:15-18

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		Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Relevance. Va. R. S. Ct. 2:402.	
165	2-6 and 11-13	Objection. Argumentative. Incomplete Hypothetical. Assumes facts not in evidence. Lacks Foundation, Lack of Personal Knowledge, Speculation. Va. R. S. Ct. 2:602. Relevance. Va. R. S. Ct. 2:402.	165:7-10

**Deposition of Laura Divenere
January 15, 2021**

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9	1-4 5 (from "is it") – 22	9:17-22: Relevance (Va. R. S. Ct. 2:402)	
10	1-19	10:5-19: Relevance (Va. R. S. Ct. 2:402)	
11	11-13 and 19-22	Relevance (Va. R. S. Ct. 2:402)	
12	1-11	12:2-11: Relevance (Va. R. S. Ct. 2:402)	
13	15 (From "I") – 22	13:15-22: Relevance (Va. R. S. Ct. 2:402)	
14	1-12	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802)	

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16	1-10, 14, 16-17 and 21	Leading; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Foundation (Va. R. S. Ct. 2.602); Lack of Authentication (Va. R. S. Ct. 2.907)	16:11-12; 16:18
17	1-3, 5, 7-9 and 22	Leading; Vague and Ambiguous; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Foundation (Va. R. S. Ct. 2.602); Lack of Authentication (Va. R. S. Ct. 2.907); Improper Opinion of a Lay Witness (Va. R. S. Ct. 2.702)	17:4; 17:10-17
18	1-4 and 6	Leading; Vague and Ambiguous; Overbroad; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Foundation (Va. R. S. Ct. 2.602); Lack of Authentication (Va. R. S. Ct. 2.907); Improper Opinion of a Lay Witness (Va. R. S. Ct. 2.702)	18:5; 18:12-15

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19	15 (from "at any time") – 17 20 and 22	19:15-20: Leading; Leading; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Foundation (Va. R. S. Ct. 2.602); Lack of Authentication (Va. R. S. Ct. 2.907) 19:21-22: Leading; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Foundation (Va. R. S. Ct. 2.602); Lack of Authentication (Va. R. S. Ct. 2.907)	19:18-20
20	1-22	Leading; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Foundation; Speculation (Va. R. S. Ct. 2.602); Lack of Authentication (Va. R. S. Ct. 2.907)	21:2-6
21	1, 9-10, 13, 15-16, 19 and 21-22	Leading; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Foundation (Va. R. S. Ct. 2.602)	21:11-12; 17-18
22	1-3, 11, 13-15 and 21	Leading; Vague and Ambiguous; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Speculation (Va. R. S. Ct. 2.602)	22:4-10; 16-20
23	1-4 and 12-20	23:1-4: Relevance (Va. R. S. Ct. 2:402); Vague and Ambiguous ; Lack of Foundation; Assumes Facts Not in Evidence	23:5-6 147:3-10

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24	8-9, 11-14, and 18-19	24:11-19: Leading; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Assumes Facts Not in Evidence; Lack of Foundation (Va. R. S. Ct. 2.602)	24:15-17 147:3-10
25	7 (from "we're") – 14	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Assumes Facts Not in Evidence; Lack of Foundation (Va. R. S. Ct. 2.602); Lack of Authentication (Va. R. S. Ct. 2.907)	147:3-10
26	15-22 [Referring to Depo Exhibit 2 – audio recording; Replace with Def Ex]	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Assumes Facts Not in Evidence; Lack of Foundation (Va. R. S. Ct. 2.602); Lack of Authentication (Va. R. S. Ct. 2.907)	147:3-10
27	1-2, 9-10 and 18-21	Leading; Vague and Ambiguous; Overbroad; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Authentication (Va. R. S. Ct. 2.907); Lack of Foundation (Va. R. S. Ct. 2.602)	27:3-4; 11-15; 22 147:3-10
28	1, 3-5, 8-9, 12, 14-17 and 21 (from "No")	Leading; Vague and Ambiguous; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Authentication (Va. R. S. Ct. 2.907); Lack of Foundation (Va. R. S. Ct. 2.602)	28:6; 10-12; 18-19
29	15 (from "Do") – 19	Hearsay (Va. R. Ct. 2.802); Lack of Foundation (Va. R. S. Ct. 2.602); Overbroad	29:6-11; 20

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30	11-13 [Referring to Depo Exhibit 3; Replace with Def Ex] 18-22	Leading; Vague and Ambiguous; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Authentication (Va. R. S. Ct. 2.907); Lack of Foundation (Va. R. S. Ct. 2.602)	31:2-5; 125:9-21; 126:7-13; 138:10-17; 139:6-141:11—Move to Strike after “yes”; 143:17-144:3
31	1, 7, 9-10, 13 and 17-22	Leading; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Foundation (Va. R. S. Ct. 2.602); Vague and Ambiguous	31:2-5; 11-12; 125:9-21; 126:7-13; 138:10-17; 139:6-141:11—Move to Strike after “yes”; 143:17-144:3
32	1-17 and 22	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Foundation (Va. R. S. Ct. 2.602); Assumes Facts Not in Evidence; Vague and Ambiguous	32:18-21; 89:8-16; 92:16-93:3; 93:9-17 97:21-98:9
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34	2, 4-5, 11 and 13-15	Hearsay (Va. R. Ct. 2.802); Lack of Foundation, Speculation (Va. R. S. Ct. 2.602); Assumes Facts Not in Evidence	34:1; 7-9; 16-19
35	3-5, 15-18, 20 and 22	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation (Va. R. S. Ct. 2.602); Improper Opinion of a Lay Witness (Va. R. S. Ct. 2.702)	35:6-12; 19

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38	14 (from "I") – 17, 20, and 22	Relevance (Va. R. S. Ct. 2:402); Speculation (Va. R. S. Ct. 2.602); Assumes Facts Not in Evidence	38:18-19
39	1-3 and 6	Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2.602); Assumes Facts Not in Evidence	37:10-13; 39:4-5; 104:4-17; 104:21-105:19; 106:2-7
41	19-22	Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2.602); Improper Opinion of a Lay Witness (Va. R. S. Ct. 2.702); Assumes Facts Not in Evidence; Vague and Ambiguous	37:10-13; 42:3-4
42	1-2, 7-10, 13, 15-17 and 20-22	Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2.602); Improper Opinion of a Lay Witness (Va. R. S. Ct. 2.702); Assumes Facts Not in Evidence; Vague and Ambiguous	37:10-13; 42:3-4; 11-12; 18-19
43	16-10	Incomplete/Unintelligible	
44	2, 4-7 and 10	Lack of Foundation; Speculation (Va. R. S. Ct. 2.602); Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Assumes Facts Not in Evidence	44:8-9; 143:17-144:3

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45	6-8, 10 and 12-14	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation (Va. R. S. Ct. 2.602); Hearsay (Va. R. Ct. 2.802); Assumes Facts Not in Evidence	45:9; 15-16
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48	2 and 4-7	Relevance (Va. R. S. Ct. 2:402); Speculation (Va. R. S. Ct. 2.602); Assumes Facts Not in Evidence	48:1; 8-11; 143:17-144:3; 114:7-13 115:2-21; 116:20-117:2; 119:15-20
55	7 (from "Let's") – 21	55:18-56:2: Hearsay (Va. R. Ct. 2.802); Lack of Foundation, Speculation (Va. R. S. Ct. 2.602);	55:22-56:1
56	2, 4-15, 18 and 20 (from "you didn't") – 22	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Foundation, Speculation (Va. R. S. Ct. 2.602);	55:7-17; 56:16-17
57	1, 5, 7-16 and 22	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Foundation, Speculation (Va. R. S. Ct. 2.602); Lack of Authentication (Va. R. S. Ct. 2.907)	57:2-4; 17-18; 82:19-22; 83:10-14

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59	1, 4-5, 7-9, 12-13 14 (from "if") – 20 [Referring to Depo Ex 4; Replace with Def Ex]	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. Ct. 2.802); Lack of Foundation, Speculation (Va. R. S. Ct. 2.602); Lack of Authentication (Va. R. S. Ct. 2.907)	59:2; 10-11; 143:17-144:3
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166	9 (from "talking") – 15 21-22	Hearsay (Va. R. Ct. 2.802); Lack of Foundation, Speculation (Va. R. S. Ct. 2.602)	166:16-18
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Deposition of Terence Dougherty (ACLU)
December 2, 2021

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307	1-22	307:11-22: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:702)	
308	1-12, 18-19, and 22	308:1-3: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
310	2-9	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
311	2-3, 8-14, and 18	311:12-18: Vague & Ambiguous; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:702)	311:15
313	1-4		
325	22 [Referring to Falati Exhibit 17; to be replaced with Def. Ex.]		
326	1-3 and 10-20		
328	7 (from "I'm") – 22 [Replace "Exhibit 18" with Def. Ex.]	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
329	1-6		329:20-330:2
330	4-5 and 7-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	329:20-330:2, 330:6
331	1	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
336	21 (from "do") – 22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	337:2
337	1, 3-6, and 8-13	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	337:2

**Deposition of Officer William Gatlin
November 23, 2021**

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
8	18-22		
9	1-22		
10	1-22		
11	1-9 and 13-15 16 (from "when") – 22	11:20-22: Relevance.	
12	1 8-15 [Replace "Exhibit No. Defendant's 22" with Def Ex] 16 (from "that's" – 18 19 (from "And") – 22	As to all questions: Relevance.	
13	1 2 (from "Does") – 4 5 (from "were") – 12 20-22	As to all questions: Relevance.	
14	1-2 and 4-11 12 (from "going") – 21	As to all questions: Relevance.	
15	1 (from "I") – 8 9 (from "Do") – 22	As to all questions: Relevance.	
16	1 and 4-22	As to all questions: Relevance.	
17	1-9 and 13-16 21-22 [Replace "Defendant's Exhibit 6" with Def Ex]	As to all questions: Relevance.	
18	1-9 10 (from "did") – 12 13 (from "when") – 15 16 (from "would") – 20 [Replace "Defendant's Exhibit 6" with Def Ex] 21 (from "And") – 22	As to all questions: Relevance.	
19	1-3 4 (from "would") – 12 13 (from "I") – 20 21 (from "Based") – 22	As to all questions: Relevance. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602.	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
20	1, 7-8 and 10-11 12 (from "And") – 22		
21	1-22		
22	1-22		
23	1-7 8 (from "Did") – 17 20-22		
24	1-6 (from "right") – 18 19 (from "does") – 22	Relevance. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602.	
25	1-22		
26	1-3 and 5 8 (from "Are") – 18	26:11-18: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701.	
27	4 (from "typically") – 12 15-22		27:13-14.
28	1-3 and 5-15 16 (from "who") – 22		
29	1-8 10 (from "let") – 11 15-22		
30	1-4 13 (from "were") – 14 16-18, 20 and 22		30:15
31	1 and 3-22		
32	1-22		
33	1-22		
34	1 3 (from "Did") – 4 5 (from "you") – 9 10 (from "And") – 22		
35	1-5 and 8 10 (from "what occurred") – 18 22	35:4-8: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602.	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
36	1-3 [Replace "Exhibit 1, Defendant's Exhibit 1" with Def Ex] 11 (from "I'm") – 22	<p>36:1-3: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Hearsay. Va. R. S. Ct. 2:802. Relevance. Va. R. S. Ct. 2:402.</p> <p>36:11-22: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Hearsay. Va. R. S. Ct. 2:802. Relevance. Va. R. S. Ct. 2:402.</p>	
37	1-16	<p>37:1-16: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Hearsay. Va. R. S. Ct. 2:802. Relevance. Va. R. S. Ct. 2:402. Assumes facts not in evidence.</p>	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
38	8 (from "What") – 13 19 and 21-22	<p>38:8-19: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Hearsay. Va. R. S. Ct. 2:802. Relevance. Va. R. S. Ct. 2:402. Assumes facts not in evidence. Improperly based on unauthenticated document.</p> <p>38:21-39:1: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Hearsay. Va. R. S. Ct. 2:802. Relevance. Va. R. S. Ct. 2:402. Assumes facts not in evidence. Improperly based on unauthenticated document.</p>	38:14-18
39	1, 3, 5-8, 11, 13-16, 18 and 20-22	As to all questions: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Hearsay. Va. R. S. Ct. 2:802. Relevance. Va. R. S. Ct. 2:402. Assumes facts not in evidence. Improperly based on unauthenticated document.	39:9-10 39:17

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
40	1 (from "what") – 3 8, 10-12, 14, 16-18 and 20-22	Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901. Hearsay. Va. R. S. Ct. 2:802. Relevance. Va. R. S. Ct. 2:402. Assumes facts not in evidence. Improperly based on unauthenticated document.	40:40-7 40:13 40:19
41	1-3 and 5-7 10 (from "did") – 13 19-21	41:1-7: Objection. Hearsay. Va. R. S. Ct. 2:802. 41:10-17: Objection. Improperly based on unauthenticated document. Lack of Authentication. Va. R. S. Ct. 2:901. Hearsay. Va. R. S. Ct. 2:802. Relevance. Va. R. S. Ct. 2:402. Assumes facts not in evidence. 41:19-42:1: Objection. Improperly based on unauthenticated document. Lack of Authentication. Va. R. S. Ct. 2:901. Hearsay. Va. R. S. Ct. 2:802. Relevance. Va. R. S. Ct. 2:402. Assumes facts not in evidence.	41:14-17 41:22
42	1 6 (from "I'm") – 22	As to all questions: Hearsay. Va. R. S. Ct. 2:802. Relevance. Lack of Foundation. Va. R. S. Ct. 2:602.	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
43	1 2 (from "this") – 16 22 (from "Did")	As to all questions: Hearsay. Va. R. S. Ct. 2:802. Relevance. Lack of Foundation. Va. R. S. Ct. 2:602.	
44	1-14 15 (from "it") – 22	As to all questions: Hearsay. Va. R. S. Ct. 2:802. Relevance. Lack of Foundation. Va. R. S. Ct. 2:602.	
45	1-22	As to all questions: Hearsay. Va. R. S. Ct. 2:802. Relevance. Lack of Foundation. Va. R. S. Ct. 2:602.	
46	1-5 and 11-15 17 (from "And") – 22	As to all questions: Hearsay. Va. R. S. Ct. 2:802. Relevance. Lack of Foundation. Va. R. S. Ct. 2:602.	
47	1-2 14 (from "By") – 20		47:21-22
48	1-7 9 (from "And") – 10 13-22	48:13-19: Objection. Lacks Foundation Va. R. S. Ct. 2:602.	
49	1-5 6 (from "And") – 9 14-21 [Replace "Defendant's Exhibit 2" with Def Ex]		49:22-50:2
50	4 (from "Do") – 6 9 11 (from "And" through "picture") 13 19-22 [Replace "Defendant's Exhibit 3" with Def Ex]	50:4-6: Lack of Foundation. Va. R. S. Ct. 2:602.	50:7-8
51	1 (through "person") 6-7, 9-10 and 13 15 (from "And") – 18	Lack of Foundation. Va. R. S. Ct. 2:602.	51:1-5

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
52	3 (from "I'm") – 8 [Replace "Defendant's Exhibit 4" with Def Ex] 11 (from "can") – 15 19-22		
53	1-5 and 7-18	53:7-18: Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602.	53:19-54:6
54	11 13 (from "Officer") – 22		
55	1 (from "And") – 3 4 (from "Do") – 10 11 (from "Can") – 14 15 (from "Can") - 22		
56	2, 4-7 and 9 10 (from "And") – 12 13 (from "you said")- 18 19 (from "Did") – 21 22 (from "And")		
57	1-13 19 (from "what") – 22		
58	1-4 and 16-20 22 [Replace "Exhibit 5" with Def Ex]	As to all questions: Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602.	
59	3-8 12 – 15 [Replace Defendant's Deposition Exhibit 4 with Def Ex]		
60	5 (from "I") – 10 14 and 16-22		
61	1-4 5 (from "can") – 8 9 (from "Can") – 11 12 (from "what") – 14 15 (from "Are") – 22		
62	1-2, 4 and 6-15 17 (from "do you") – 21		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
63	3-7 and 17-22	63:17-22: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Lack of Authentication. Va. R. S. Ct. 2:901.	
64	1-12 and 19-20	As to all questions: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Lack of Authentication. Va. R. S. Ct. 2:901.	64:13-18
65	5-10 [Replace "Defendant's Exhibit 8" with Def Ex] 12-15 and 21-22	As to all questions: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Lack of Authentication. Va. R. S. Ct. 2:901.	65:16-20
66	1 8-11 [Replace "Defendant's Exhibit 9" with Def Ex] 14-15 and 17-22	66:8-11: Lack of Authentication. Va. R. S. Ct. 2:901.	66:12-13
67	1 (from "are you in a") – 5 10	Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Lack of Authentication. Va. R. S. Ct. 2:901.	67:6-9

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
69	1-8 [Replace "Defendant's Exhibit 11" with Def Ex] 14 and 16 (from "Do") -20	As to all questions: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Lack of Authentication. Va. R. S. Ct. 2:901.	69:9-13
70	17-22 [Replace "Defendant's Exhibit 12" with Def Ex]	Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Lack of Authentication. Va. R. S. Ct. 2:901.	
71	1 and 5 10-16 [Replace "Defendant's Exhibit 13" with Def Ex] 20	As to all questions: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Lack of Authentication. Va. R. S. Ct. 2:901.	71:2-4 71:17-19
72	3-9 [Replace "Defendant's Exhibit 14" with Def Ex] 13 18-22 [Replace "Defendant's Exhibit 15" with Def Ex]	As to all questions: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Lack of Authentication. Va. R. S. Ct. 2:901.	72:10-12
73	1-2 and 6 11-16 [Replace "Defendant's Exhibit 16" with Def Ex] 20	As to all questions: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Lack of Authentication. Va. R. S. Ct. 2:901.	73:3-5 73:17-19

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
74	3-8 [Replace "Defendant's Exhibit 17" with Def Ex] 12 17-22 [Replace "Defendant's Exhibit 18" with Def Ex]	As to all questions: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Lack of Authentication. Va. R. S. Ct. 2:901.	74:9-11
75	4 6 (from "are") – 9 13 and 15-19 20 (from "your")	75:6-13: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Lack of Authentication. Va. R. S. Ct. 2:901.	75:1-3 75:10-12 75:21-22
76	1-4, 6-7, 10-11 and 15-16 18 (from "in") – 22	76:10-16: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Improper Opinion of Lay Witness. Va. R. S. Ct. 2:701. 76:18-22: 76:10-16: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Improper Opinion of Lay Witness. Va. R. S. Ct. 2:701.	76:12-14
77	1-8, 11-15 and 17-22	77:1-3: Objection. Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Improper Opinion of Lay Witness. Va. R. S. Ct. 2:701. Relevance.	
78	1-22		
79	1 (from "Are") – 4 7-9, 11-15 and 20-22	Objection. Argumentative. Calls for a Legal Conclusion.	79:5-6 79:16-19

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
80	1, 3-13 and 17-20	80:17-20: Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Improper Opinion of Lay Witness. Va. R. S. Ct. 2:701. Relevance. Assumes facts not in evidence. As to all questions: Argumentative.	80:21-81:2
81	16-19 and 21-22		81:14-15
82	1 14-21 [Replace "Defendant's Exhibit 23" with Def Ex]	Objection. Relevance. Incomplete Question. Assumes facts not in evidence.	83:2-10 83:14-17
83	1 and 18-22		
84	1 2 (from "there") – 5 9 (from "Does") – 11 17-22	84:2-4: Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602. Improper Opinion of Lay Witness. Va. R. S. Ct. 2:701. Relevance. Assumes facts not in evidence. Incomplete Hypothetical.	84:6-7 84:12-16
85	2-4 and 10	Lack of Foundation; Speculation; Lack of Personal Knowledge. Va. R. S. Ct. 2:602.	85:5-9
86	6 (from "What") – 8 17-21	Objection. Lack of Foundation. Va. R. S. Ct. 2:602. Relevance. Assumes facts not in evidence.	86:9-16
87	1-3, 11 and 13-21	Objection. Lack of Foundation. Va. R. S. Ct. 2:602. Relevance. Assumes facts not in evidence.	87:4-10

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
88	4-17 and 20-22	Objection. Objection. Lack of Foundation. Va. R. S. Ct. 2:602. Relevance. Assumes facts not in evidence.	88:18-19
89	1 3 (from "And") – 7 18-20	Objection. Lack of Foundation. Va. R. S. Ct. 2:602. Relevance. Assumes facts not in evidence.	

**Deposition of Eric George
April 5, 2021**

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
11	11-22		
12	1-22		
13	11-22	13:11-18: Relevance (Va. R. S. Ct. 2:402). 13:19-14:3: Relevance (Va. R. S. Ct. 2:402).	
14	1-22	14:4-9: Relevance (Va. R. S. Ct. 2:402). 14:10-14: Relevance (Va. R. S. Ct. 2:402). 14:15-21: Relevance (Va. R. S. Ct. 2:402).	
15	1-8 and 15-22	14:22-15:5: Relevance (Va. R. S. Ct. 2:402). 15:6-8: Relevance (Va. R. S. Ct. 2:402). 15:15-16:1: Relevance (Va. R. S. Ct. 2:402).	
16	1, 3-7 and 12-22		16:8-10
18	2-14		
22	13 (from "Mr.") – 21 (through "that")		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
24	1 (from "I'm") – 20	24:19-20: Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701).	
25	4 (from "And") – 13 19 (from "When") – 22	25:4-10: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	
26	1-14		
27	3 (from "In") – 13 14 (from "I'm") – 15 (through "4") [Replace "Exhibit No. 4" with Def Ex]20 (from "And") – 22	27:20-28:6: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	
28	1-14 19 (from "On") – 22	28:19-22: Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Lack of Authentication — (Va. R. S. Ct. 2:901); Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	
29	1-5 and 10-19 20 (from "why") – 22	29:1-19: Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802). 29:20-22: Incomplete Response	
31	1-22	31:11-32:2: Lack of	32:1-2

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802); Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	
31	1-4		
32	3 (from “Now”) - 22	32:3-22: Leading; Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	
33	12-15 17 (from “if”) – 19 [Replace “No. 5” with Def Ex]		
34	2 (from “it”) – 8 10-22	34:2-10: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802). 34:11-13: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802). 34:14-35:2: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	34:9
35	1-2		
36	12 (“Let’s go to No. 6” only) [Replace “No. 6” with Def Ex]	Incomplete Question	36:11-16
43	19 (from “What”) – 22		
44	5-11	Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802); Improper Opinion (Va.	44:1-2

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		R. S. Ct. 2:701)	
45	7 (from "Now") – 14 17-22	45:7-17: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802). 45:18-46:10: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
46	1 and 4-10		
47	3 (from "Mr.") – 5 [Replace "Exhibit No. 9" with Def Ex]9-22	47:9-14: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802). 47:19-48:8: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	48:1
48	2-11 (through "judgment") 13-22	48:13-9: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	
49	1-12 and 19-22	49:10-12; 12-20: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	
50	1-19	49:21-50:12: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802). 50:13-19: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	
51	1 (through "series") [Replace "No. 10" with	51:16-52:11: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S.	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
	Def Ex] 12 (from "I'm") - 22	Ct. 2:802); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701);	
52	1-22	52:1-11: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802). 52:15-53:2: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	
53	1-11 and 21-22	53:1-11: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	
54	1-20	53:21-54:6: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802). 54:7-20: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802); Lack of Foundation; Speculation.	
55	12 ("if we can go to Exhibit No. 11" only) [Replace "Exhibit No. 11" with Def Ex]	Incomplete Question	
56	1 (from "I'm") – 12 16-22	56:1-12: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802); Secondary evidence, the document speaks for	56:13-14

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>itself (Va. R. Sup. Ct. 2:1002).</p> <p>56:16-1: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802); Secondary evidence, the document speaks for itself (Va. R. Sup. Ct. 2:1002).</p>	
57	1-6 and 10-17 19 (from “let’s”) – 20 (through “12”) [Replace “No. 12” with Def Ex]	57:2-17: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	57:7-9
58	15 (from “Now”) – 21	58:15-59:17: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	58:22-59:1
59	2-17	58:15-59:17: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
60	4-22 [Replace "Exhibit 13" with Def Ex]	60:4-61:3: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
61	1-3 and 6-13 15 ("let's go to 14" only) [Replace "14" with Def Ex] 20-22	61:6-13: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	61:4-5
62	1-11	61:20-62:11: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	62:12-13; 62:21-63:3
63	5 and 8-13	63:5-13: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	63:6-7
64	10-19 [Replace "Exhibit 15" with Def Ex] 21-22	64:10-65:2: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	64:20
65	1-2		
67	19-22 [Replace "Exhibit No. 18" with Def Ex]	67:19-22: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	

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68	1-8 15 (from "Now") – 16 (through "19") [Replace "Exhibit No. 19" with Def Ex]	68:1-8: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
71	18-21	71:18-72:5: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	71:22-72:1
72	2-5 and 12-22 [Replace "Exhibit No. 21" with Def Ex]	72:12-22: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
73	1-22	73:1-22: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
74	1-3 and 6-12	74:1-12: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct.	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		2:701); Hearsay — (Va. R. S. Ct. 2:802).	
76	1-22	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
77	1-22	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
78	1-10 and 14-22	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	78:11-13
79	1-22	79:1-10: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802). 79:11-80:2: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	

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		Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
80	1-2 4 (from “Do”) – 7 [Replace “Exhibit No. 22” with Def Ex] 8 (from “Now”) – 16 21 (from “was”) -22	81:1-82:13: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	
81	1-9 and 15-22		
82	1-13		
83	1-13	83:1-13: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	
86	17 (from “I’m”) – 22 [Replace “Deposition Exhibit No. 25” with Def Ex]	86:17-87:9: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
87	1-21	87:10-18: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802). 87:19-88:5: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	87:22-88:1
88	2-5 7 (from “go to”) – 8 [Replace “26” with Def Ex] 12-20	88:12-20: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	

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90	1-7		
92	2-8 [Replace “Deposition Exhibit 28” with Def Ex] 11-16	92:2-16: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	92:9-10
94	12-22 [Replace “Deposition Exhibit No. 30” with Def Ex]	94:12-95:6: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	

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95	1-6 and 9-15 22 (from "I'm")	95:9-15: Relevance (Va. R. S. Ct. 2:402; Hearsay — (Va. R. S. Ct. 2:802).	95:7-8
96	1-21 [Replace "Deposition Exhibit 32" with Def Ex]	96:2-21: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	96:22
97	1-8	97:2-8: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
98	10-22 [Replace "Deposition Exhibit 33" with Def Ex]	98:10-99:16: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	99:8-9
99	1-7 and 10-16	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
101	12 (from "So") -21 [Replace "Deposition Exhibit 35" with Def Ex]	101:12-21: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge	101:22-102:1

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102	4-21	102:4-11: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802). 102:19-103:2: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
103	1-2, 8-15 and 22	103:8011: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
104	1-13 [Replace “Plaintiff’s Exhibit – or Exhibit No. 36” with Def Ex]		
107	8-13 and 16-22	107:8-108:3: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va.	107:14-15

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		R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
108	1-3		
109	17-20		
110	9 (from “I filed”) – 16		
112	4 (from “Was”) – 6 12-22 [Replace “Exhibit No. 40” with Def Ex]	112:4-6: Relevance (Va. R. S. Ct. 2:402) 112:12-21: Relevance (Va. R. S. Ct. 2:402).	
113	1-3	Relevance (Va. R. S. Ct. 2:402).	
151	20-22		
152	1-5 and 11-16	152:2-16: Relevance (Va. R. S. Ct. 2:402).	152:17-22; 153:1-5
155	13 (from “Let’s”) – 22		
156	1-22	156:1-18: Relevance (Va. R. S. Ct. 2:402).	
157	1-8 and 21-22		
158	11 (from “So”) – 12 15-16	158:11-16: Relevance (Va. R. S. Ct. 2:402).	
159	4-7, 11-14 and 21-22	159:4-7: Relevance (Va. R. S. Ct. 2:402). 159:11-14: Relevance (Va. R. S. Ct. 2:402).	
160	1-12 and 17-19	160:1-12: Relevance (Va. R. S. Ct. 2:402). 160:17-19: Relevance (Va. R. S. Ct. 2:402).	
163	16-22		
164	6-12 and 18-22	164:9-12; 164:18-20: Relevance (Va. R. S. Ct. 2:402).	
165	1, 7-11, 13-14 and 18-22	164:21-165:1: Relevance (Va. R. S. Ct. 2:402). 165:7-11: Relevance (Va. R. S. Ct. 2:402).	
166	1-12 and 16-22	165:18-166:9: Relevance (Va. R. S. Ct. 2:402);	

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		Hearsay — (Va. R. S. Ct. 2:802). 166:10-22: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	
172	7-14	172:7-14: Relevance (Va. R. S. Ct. 2:402).	170:17-172:6; 172:15-173:11
173	12-18	173:12-18: Relevance (Va. R. S. Ct. 2:402).	
178	13 and 21-22	178:13; 178:21-179:6: Relevance (Va. R. S. Ct. 2:402).	174:13-178:12; 178:14-20
179	1-6		
187	4 (from “Going”) – 7 10-19	187:4-7; 187:10-19: Relevance (Va. R. S. Ct. 2:402).	187:20-21
188	19-22	188:19-189:4: Relevance (Va. R. S. Ct. 2:402).	
189	1-4 and 6-22	189:6-21: Relevance (Va. R. S. Ct. 2:402).	
190	1-9	189:22-190:9: Relevance (Va. R. S. Ct. 2:402).	
192	6 (from “Anything”) – 22	192:6-22: Relevance (Va. R. S. Ct. 2:402).	
193	1-22	Relevance (Va. R. S. Ct. 2:402).	
194	1-10 (through “Nevada”)	Relevance (Va. R. S. Ct. 2:402).	
195	2 [Replace “Exhibit 1” (which is Depo Ex 48) with Def Ex] 7-19	Incomplete statement; not testimony	194:12-195:3
199	7-22		
200	1-5, 9-15 and 20-22	200:3-5; 200:9-12: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	

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		200:20-201-4: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
201	1-4, 7-9 and 13-15	201:4; 201:7-9; 201:13-15: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	201:16-19; 202:3-4
202	5-8 22 (from "I")	202:5-8; 202:22-203:2: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	
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220	13-16	220:13-16: Relevance (Va. R. S. Ct. 2:402).	
240	9-13	240:9-13: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602).	
244	14-22	244:14-245:1: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	244:1-13; 245:2-14
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249	2 (from "Have") – 3 [Replace "Exhibit 9" (which is Depo Ex 52) with Def Ex] 8-22	249:12-20: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	
250	1-6	249:21-250:6: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	250:7-251
251	5-10 and 14-22	Incomplete statements; not testimony	251:11-13; 252:5-12
252	1-4	Incomplete statements; not testimony	252:5-253:4
290	19-22	290:19-291:2; 291:5: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802); Improper Opinion (Va. R. S. Ct. 2:701).	291:3-4
291	1-2 and 5		
303	9-16 21 (from "The") – 22	3039-16; 303:21-304:5: Leading; Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	303:17-20
304	1-5		
306	1-3 and 7-12 13 (from "What") – 16 19-20	306:1-3; 3-6:7-12: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802).	306:4-6; 306:17-18

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13	1 and 10-22	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701)	13:2-9
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15	12-21	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701)	
18	6-8 16 (from "Was") – 22	18:6-8: Vague; Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation	18:14-16 (to "believe").
19	1 and 20-22		
20	1-22	20:6-12: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701)	
21	1-5 and 10-14		
22	10 13 (from ""Not") -19		22:8-9
23	4-22		

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25	1 (from "And") – 5		
26	7 (from "What") – 19	Relevance (Va. R. S. Ct. 2:402)	
27	5-17 18 (from "so") – 19 22	Relevance (Va. R. S. Ct. 2:402)	27:20-21
28	8-18		
29	11 (from "Approximately") – 22	29:11-17: Speculation; Improper Opinion (Va. R. S. Ct. 2:701)	
30	1-3 (through "footage") 9 (from "And") – 14		30:15-31:1
36	8 (from "Back") – 13	Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802)	35:2-22
41	5-16	41:5-8: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802) 41:9-16: Relevance (Va. R. S. Ct. 2:402);	
44	5 (from "so") – 10 14-22	44:5-10: Relevance (Va. R. S. Ct. 2:402); Hearsay — (Va. R. S. Ct. 2:802) 44:18-20: Relevance (Va. R. S. Ct. 2:402);	44:11-13
48	18-19 and 22		48:20-21
49	1-22	49:7-19: Hearsay (Va. R. S. Ct. 2:802). 49:20-50:6: Hearsay — (Va. R. S. Ct. 2:802)	
50	1-6 20 (from "why did") – 22	50:20-22: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay	

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51	1-7 and 9-22	51:1-7: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802) 51:9-22: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	51:8
52	1-18 (through “her”)	52:1-18: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	52:18 (from “and”) -53:7
54	8-14 and 18-22	54:8-22: Leading; Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	54:15-17
55	1-15	55:1-8: Vague; Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S.	55:16-18

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		Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802) 55:9-12: Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802)	
56	10-15	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Hearsay — (Va. R. S. Ct. 2:802).	56:9; 56:16-19
57	1-3 6-8 (through “footage”)	57:6-8: Hearsay — (Va. R. S. Ct. 2:802).	57:4-5; 57:8 (from “and”) – 10.
58	12 (from “When”) – 14 17-22		58:15-16
59	1-2 (through “back”)		59:2 (from “but”) - 14
66	14 (from “the”) – 18		66:10-14 (to “misunderstand”)
68	12-22	Hearsay — (Va. R. S. Ct. 2:802)	
69	1-5	Hearsay — (Va. R. S. Ct. 2:802).	
73	1-3 [Replace “Deposition Exhibit 2” with Def Ex] 8-11		
75	21 (from “is”) – 22		
76	1-3 and 9-12 (through “so”)	Leading; Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper	76:4-7; 76:12 (from “it’s”) – 22; 77:1-3

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83	1-6	Hearsay — (Va. R. S. Ct. 2:802).	
84	8-9 and 12-14		84:10-11
85	14 (from "how") – 19		
87	8-13 14 (from "so") – 19	Leading; Relevance (Va. R. S. Ct. 2:402).	
88	10-13 [Replace "Harrell Deposition Exhibit 5" with Def Ex] 17-20	Lack of Foundation; Lack of Authentication — (Va. R. S. Ct. 2:901).	88:21-22
89	1-2 7-16 [Replace "Harrell Exhibit 6" with Def Ex] 20-22 [Replace "Harrell Exhibit 7" with Def Ex]	89:7-16: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Lack of Authentication — (Va. R. S. Ct. 2:901).	
90	3-10 16 (from "Mr.") – 19 20 (from "if") -22 [Replace "Harrell Exhibit 8" with Def Ex]	90:3-10: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Lack of Authentication — (Va. R. S. Ct. 2:901).	
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93	12-15 and 18 21-22 [Replace “Harrell Exhibit 9” with Def Ex]	93:12-18: Relevance (Va. R. S. Ct. 2:402)	93:16-17
94	1-6 10-14 [Replace “Harrell Exhibit 10” with Def Ex] 18-20	94:1-6: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Lack of Authentication — (Va. R. S. Ct. 2:901). 94:10-14: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Lack of Authentication — (Va. R. S. Ct. 2:901).	
95	6-7 (through “at”) 7 (from “Harrell”) – 12 [Replace “Harrell Exhibit 11” with Def Ex] 16-22 [Replace “Harrell Exhibit 12” with Def Ex]	95:6-12: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Lack of Authentication — (Va. R. S. Ct. 2:901). 95:16-96:1: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Speculation; Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	

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106	1-4, 9-18, 20 and 22	106:1-4; 9-10: Leading; Relevance (Va. R. S. Ct. 2:402); Lack of Foundation; Hearsay — (Va. R. S. Ct. 2:802).	106:5-8; 106:19; 106:21

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January 18, 2021**

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62	16-22	Incomplete designation of a question but not the answer Hearsay (Va. R. S. Ct. 2:802); Unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 4:404); calls for speculation (Va. R. S. Ct. 2:602)	63:13-15

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63	1, 17-18 and 20	Unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 4:404); calls for speculation (Va. R. S. Ct. 2:602); vague	63:13-15 63:19
66	22	Relevance (Va. R. S. Ct. 2:402)	
67	1-3, 6 and 18-20	Relevance (Va. R. S. Ct. 2:402)	67:4-5 67:21-22
68	1, 13-18 and 21-22	Relevance (Va. R. S. Ct. 2:402)	
69	1-5, 7-8, 10, 16-17, 20 and 22	All lines: Relevance (Va. R. S. Ct.2:402) Lines 16-17, 20, 22: unfair prejudice (Va. R. S. Ct. 2:403)	69:6 69:21
70	1-2, 7-8, 12 and 21-22 [Replace "Deposition Exhibit 8" with Def Ex]	Lines 1-2: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403) Lines 7-8, 12: relevance (Va. R. S. Ct. 2:402); vague; ambiguous	70:11
71	3-16 and 22	Lines 10-16, 22: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); lacks foundation / personal knowledge / calls for speculation (Va. R. S. Ct. 2:602)	
72	1 and 7-8	Lines 7-8: improper designation of a question without the answer Relevance (Va. R. S. Ct. 2:402)	72:9-11
73	14-18	Relevance (Va. R. S. Ct. 2:402)	
74	1-13	Relevance (Va. R. S. Ct. 2:402)	
75	21-22		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
76	1-2, 15-17 and 19-20	Lines 15-17, 19-20: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	76:18
77	4 (from "I") – 14 18-21	Lines 4-11: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403) Lines 12-14, 18-21: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	77:15-16 77:22-78:1
78	4		
81	13 (from "In") – 16 19-21		81:17-18 81:22 – 82:3
82	5 (from "I don't") – 22	Lines 5-20: speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	
83	1-13	Lines 9-13: speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	
84	21 (from "And") – 22	Lacks foundation / personal knowledge (Va. R. S. Ct. 2:602)	
85	1-2 and 9-16	Lines 1-2: Lacks foundation / personal knowledge (Va. R. S. Ct. 2:602)	
88	20-22		
89	1-8, 12-13 and 17-22	Relevance (Va. R. S. Ct. 2:402)	89:15-16
90	1-21	Relevance (Va. R. S. Ct. 2:402)	
91	10-13 and 16	Relevance (Va. R. S. Ct. 2:402)	
94	14-15 and 19-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	94:16-17
95	6-8	Relevance (Va. R. S. Ct. 2:402)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
98	15 (from "You") – 21	Calls for speculation (Va. R. S. Ct. 2:602)	98:22 – 99:1
99	3-5, 7-9, 13 and 17-21 [Replace "Exhibit 10" with Def Ex]	All lines : Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403) Lines 8-9, 13: speculation (Va. R. S. Ct. 2 :602) Lines 4-5: argumentative	99 :6 99 :10-12 99 :14-16
100	1-7	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403); assumes facts not in evidence	
101	21-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403); improper character evidence (Va. R. S. Ct. 2:404)	
102	1 and 8-11	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403); improper character evidence (Va. R. S. Ct. 2:404)	
104	9-11	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403); improper character evidence (Va. R. S. Ct. 2:404); vague	104:12
118	7 (from "during") – 12, and 15	Relevance (Va. R. S. Ct. 2:402)	118:13-14
125	9 (from "Now") – 13	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403); jury confusion (Va. R. S. Ct. 2:403); assumes facts not in evidence	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
126	6-9 [Replace "Deposition Exhibit 9" with Def Ex] 13-17 and 20-21	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403); jury confusion (Va. R. S. Ct. 2:403); assumes facts not in evidence; lacks personal knowledge (Va. R. S. Ct. 2:602)	126:12 126:18-19
127	16-17 and 19-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403); jury confusion (Va. R. S. Ct. 2:403); assumes facts not in evidence; argumentative	127:18
128	5-10 and 21	Lines 5-8: unfair prejudice (Va. R. S. Ct. 2 :403); jury confusion (Va. R. S. Ct. 2:403); assumes facts not in evidence Lines 9-10, 21: lacks foundation / personal knowledge / calls for speculation (Va. R. S. Ct. 2:602); assumes facts not in evidence; vague; ambiguous; unfair prejudice (Va. R. S. Ct. 2:403)	128: 11-18
129	2-10	lacks foundation / personal knowledge / calls for speculation (Va. R. S. Ct. 2:602); assumes facts not in evidence; unfair prejudice (Va. R. S. Ct. 2:403)	
144	19 ("Exhibit 5") - 20 [Replace "Exhibit 5" with Def Ex]		
145	6 (from "I don't") – 8 13 and 19-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
146	1-7	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
188	12-15, 19 and 22	Argumentative	188:16-18
189	1-2 and 4-6		189:3
190	21-22	Relevance (Va. R. S. Ct. 2:402)	
191	1, 3 and 8-12	Relevance (Va. R. S. Ct. 2:402)	
194	5-15 [Replace "Jacobs Exhibit 2" with Def Ex] 20 [Replace "Deposition Exhibit 3" with Def Ex]	Lines 5-8: Improper designation of only an answer without a question All lines: Relevance (2:402)	
195	10-22	Relevance (Va. R. S. Ct. 2:402); jury confusion (Va. R. S. Ct. 2:403)	
196	1-12	Relevance (Va. R. S. Ct. 2:402); jury confusion (Va. R. S. Ct. 2:403)	
197	7-10 and 19-22	Lines 7-10: Speculation (Va. R. S. Ct. 2:602) Lines 19-22: speculation (Va. R. S. Ct. 2:602)	
198	1-17 and 19-20	All lines: speculation (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:603) Lines 14-17, 19-20: improper character evidence (Va. R. S. Ct. 2:404); needlessly cumulative (Va. R. S. Ct. 2:403); asked and answered	198:18 198:21 – 199:1

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199	7	speculation (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:603); improper character evidence (Va. R. S. Ct. 2:404); needlessly cumulative (Va. R. S. Ct. 2:403); asked and answered	
202	7-15 [Replace "Deposition Exhibit 5" with Def Ex]	Relevance (Va. R. S. Ct. 2:402)	
203	3-8, 10-11 and 20-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403)	
204	1-22	All lines : relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403) Lines 7-13: hearsay (Va. R. S. Ct. 2:802)	
205	1-3 11 (from "I thought") – 20	All lines : relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403) Lines 18-20: argumentative	205:21-22
206	8-11 and 22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403)	
207	1-4 and 6-11	Lines 1-4, 6 : Speculation (Va. R. S. Ct. 2 :602) ; needlessly cumulative (Va. R. S. Ct. 2 :403) ; unfair prejudice (Va. R. S. Ct. 2 :403) Lines 7-11: relevance (Va. R. S. Ct. 2:402)	207:5

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
209	22	Incomplete designation of only an answer but no question Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403) ; speculation / lacks personal knowledge.(Va. R. S. Ct. 2 :602)	
210	1-3 8 (from "So") – 12 16-20	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403) ; speculation / lacks personal knowledge (Va. R. S. Ct. 2 :602); needlessly cumulative (Va. R. S. Ct. 2:403); assumes facts not in evidence	210:13-14 210:21-22
211	2-6, 10-14 and 18-21	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403) ; speculation / lacks personal knowledge (Va. R. S. Ct. 2 :602); needlessly cumulative (Va. R. S. Ct. 2:403); assumes facts not in evidence	211:7-9 211:15-17 211:22 – 212:2
212	3-10	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403) ; speculation / lacks personal knowledge (Va. R. S. Ct. 2 :602); assumes facts not in evidence; leading	212:11-18
213	1-11, 15 and 18-20	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403) ; speculation / lacks personal knowledge (Va. R. S. Ct. 2 :602); assumes facts not in evidence	213:12-14 213:21-22

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
214	5 and 10-16	Line 5: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403) ; speculation / lacks personal knowledge (Va. R. S. Ct. 2 :602); assumes facts not in evidence	

Deposition of Tracey Jacobs
May 13, 2008
Depp, et al. v. Bloom, et al.
Superior Court of the State of California

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
10	19 (through "Jacobs")	This deposition was not taken and has not been admitted in this action. This deposition is not properly designated, and objection is made to Ms. Heard's designations in their entirety on that basis. To the extent that the Court allows Ms. Heard to designate depositions from other actions over Mr. Depp's objections, Mr. Depp expressly reserves the right to counter-designate following a ruling of the Court to authorizing Ms. Heard.	
12	13 (from "When") – 25		
13	1-14 and 24-25		
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45	21-25 [Replace "Exhibit 243" with Def Ex]		
46	1-25		
47	1 and 5-10		
55	1-25		
56	1-7		
57	2-8		
63	5 [Replace "Plaintiff's Exhibit 246" with Def Ex] 9-25		
64	1-13 and 20-23		
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68	3-8		
71	5-6 (through "247" [Replace "Exhibit 2427" with Def Ex] 9-19		
72	20-25 [Replace "Exhibit 248" with Def Ex]		
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79	12-25 [Replace "Exhibit 249" with Def Ex]		
80	1 and 21-25 [Replace "Exhibit 250" with Def Ex]		
81	1-3 and 8-25		
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Deposition of Tracey Jacobs

May 30, 2018

Depp, et al. v. The Mandel company, Inc. d/b/a The Management Group, et al.

Superior Court of the State of California

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
15	15-20	This deposition was not taken and has not been admitted in this action. This deposition is not properly designated, and objection is made to Ms. Heard's designations in their entirety on that basis. To the extent that the Court allows Ms. Heard to designate depositions from other actions over Mr. Depp's objections, Mr. Depp expressly reserves the right to counter-designate following a ruling of the Court to authorizing Ms. Heard.	
16	9-25		
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20	1		
21	9 (from "So") – 13		
23	4-5		
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46	7-21		
52	2-14		
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64	1-13 and 20-25		

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74	1-2, 8-19 and 25		
75	1-2 and 18-25		
76	1-2, 7, 9-13, 16-17 and 22-25		
77	1-5 and 24-25 [Replace "47" with Def Ex]		
78	1-25		
79	1-22		
80	1-25		
81	1-12		
84	23 and 25 [Referring to Exhibit 50; Replace with Def Ex]		
85	1-2 and 6-25		
86	1-17 (through "No") and 18		
87	20-25 [Referring to Exhibit 51; Replace with Def Ex]		
88	1-17		
90	3 and 5-11 [Referring to Exhibit 53; Replace with Def Ex]24-25		
91	1-8		
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95	3 and 5-25 [Replace "Exhibit 55" with Def Ex]		
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98	10-19 and 23-25		
99	1-14 and 16-25 [Replace "Exhibit 56" with Def Ex]		
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107	1-3 and 5-11 [Replace "Exhibit 58" with Def Ex]		
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139	1-11 [Replace "Exhibit 63" with Def Ex] 13-25		
140	1-11 [Replace "Exhibit 64" with Def Ex] 14-25 [Replace "Exhibit 64" with Def Ex]		
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144	10 [Replace "Exhibit 65" with Def Ex] 12-23		
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153	13 [Replace "Exhibit 67" with Def Ex] 15-25		
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160	5-9 and 11 [Replace "Exhibit 70" with Def Ex] 13-25 [Replace "Exhibit 70" with Def Ex]		
161	1-6, 10 and 13-25		
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164	1-25 [Replace "Exhibit 72" with Def Ex]		

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169	1-12 and 15-25		
170	1-2 and 6 [Replace "Exhibit 73" with Def Ex] 8-25 [Replace "Exhibit 73" with Def Ex]		
171	1-11 and 17-25		
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173	3-5, 9 and 11-16 25 [Replace "Exhibit 74" with Def Ex]		
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187	1-11, 19 and 21-25 [Replace "Exhibit 75" with Def Ex]		
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**Deposition of David Kipper, M.D.
February 22, 2021**

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18	1, 2 (from second "and") -22	18:1-18: Relevance (Va. R. S. Ct. 2:402)	
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23	18-22	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	24:2-3
24	1	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	24:2-3
24	4-6	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge	24:2-3

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
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31	2-21 (through first "issues"), and 22 (from "did')		
32	11-22 (Replace "Kipper 3" with Def's Ex)		
33	1-22		
34	1-4		
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36	1 and 18-22 (Replace "Kipper 4" with Def's Ex)		
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38	1-22 (Replace "Kipper 4" with Def's Ex)		
39	1-17, 20-22		
40	1-12, 17-22 (Replace "Kipper 5" with Def's Ex)		
41	1-4 7 (from "So") -21 (Replace "Kipper 5" with Def's Ex)	41:1-4: Incomplete/ Unintelligible; Relevance (Va. R. S. Ct. 2:402)	
42	21 (through "up")		
43	1-18	43:10-18: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	
44	6-8 (Replace "Kipper 5" with Def's Ex) 17- 22		
45	10 (from "And") -13, 16-22 (Replace "Kipper 5" with Ex)		
46	1-2 and 18-22		

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51	1-4	Hearsay (Va. R. S. Ct. 2:802)	
52	5 (from second "and") - 8 11-14 (Replace "Kipper 6" with Def's Ex) 15 (from "let's" -22 (Replace "Kipper 5" with Def's Ex)	52:5-14: Hearsay (Va. R. S. Ct. 2:802)	
53	1-11 and 13-16	53:1-16: Hearsay (Va. R. S. Ct. 2:802)	53:12
56	22 (referring to Kipper 7)	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
57	1-18 19 (from second "and") - 21 22 (from second "and") (referring to Kipper 7)	57:1-11: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
58	1-4, 5 (from "And" - 9 11-22 (referring to Kipper 7)		
59	1-3, and 4 (from second "wasn't") - 9 19-21, and 22 (from second "this") (Replace "Kipper 7" with Def's Ex)		
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65	1 (from "Do") – 5 6 (from second "is it") - 14 (Replace "Kipper 5" with Def's Ex) 16-22	65:10-22: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	65:15, 66:3
66	1-2 (referring to Kipper 5)	(see below)	(see below)
66	1-2, 5-7 8 (from third "you") - 10 13-15 16 (from "And") – 18 19 (from second "and patient") - 22	66:1-7: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602) 66:8-10: Incomplete/ Unintelligible; Needlessly Cumulative (Va. R. S. Ct. 2:403) 66:22: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	65:15, 66:3
67	1-4, and 5 (from second "was") - 7	67:1-7: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	67:20-68:3
68	13-22 (Replace "Kipper 5" with Def's Ex)	68:21-22: Hearsay (Va. R. S. Ct. 2:802)	69:4, 193:22-194:21
69	1-3, 5-9 and 14-22 (Replace "Kipper 8" with Def's Ex)	69:14-19 (including "Kipper 8"): Hearsay (Va. R. S. Ct. 2:802)	69:4, 193:22-194:21. 196:4-197:4, 202:15-203:1
70	1-3 5 (from second "this") - 7 12-15 and 16 (from "It's") – 18 20-22		193:22-194:21, 196:4-197:4, 202:15-203:1

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73	3 (from second "she") - 15 (Replace "Kipper 8" with Def's Ex)	73:3-15: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Character Evidence (Va. R. S. Ct. 2:404)	73:1, 193:22-194:21, 196:4-197:4, 202:15-203:1
74	6-19 and 22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Character Evidence (Va. R. S. Ct. 2:404)	196:4-197:4, 202:15-203:1
74	22	(see above)	(see above)
75	1-6, 10-17 and 20-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Character Evidence (Va. R. S. Ct. 2:404)	75:18-19, 193:22-194:21, 196:4-197:4, 202:15-203:1
76	1-18	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	196:4-197:4, 202:15-203:1

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78	1, 3-19 and 21-22	78:1: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Character Evidence (Va. R. S. Ct. 2:404) 78:13-22: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	78:2 78:20, 79:1
79	2, 7-17 and 22	79:2: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	79:1
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84	1-9, 12-16, and 20-22 (Replace "Kipper 5" with Def's Ex)	84:7-14: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602) 84:15-20: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	84:10 84:17-18
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88	8-10 and 12-22	Vague & Ambiguous; Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	88:11

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90	1-4 and 10-20 (Replace "Kipper 5" with Def's Ex)	<p>90:1-4: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)</p> <p>90:10-20: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Character Evidence (Va. R. S. Ct. 2:404)</p>	<p>89:22</p> <p>91:7</p>
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92	1-2, 4-6, 7 (from second "and") -10 18-22	<p>92:1-6: Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Character Evidence (Va. R. S. Ct. 2:404)</p> <p>92:7-21: Leading; Vague & Ambiguous; Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)</p> <p>92:22: Hearsay (Va. R. S. Ct. 2:802)</p>	92:3 92:11-17, 93:10-94:4
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97	1-12	97:1-12: Incomplete/ Unintelligible; Hearsay (Va. R. S. Ct. 2:802)	97:13-15 (through "text")
98	9-14 and 16-19	98:9-12: Hearsay (Va. R. S. Ct. 2:802) 98:13-19: Vague & Ambiguous; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	98:15, 98:20-99:4
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139	1-14 18-22 (Replace "Kipper 19" with Def's Ex)	139:18-22 (and "Kipper 19"): Hearsay (Va. R. S. Ct. 2:802)	
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159	1-20 and 22	Hearsay (Va. R. S. Ct. 2:802); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	159:21
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161	1-3 and 11-22 (Replace "Kipper 27" with Def's Ex)	<p>161:11-13 (and "Kipper 27"): Hearsay (Va. R. S. Ct. 2:802)</p> <p>161:19-22: Hearsay (Va. R. S. Ct. 2:802)</p>	
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165	1-4, and 5 (from second "that's) - 6 18-22	<p>165:18-22: Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Lack of Authentication (Va. R. S. Ct. 2:901)</p>	
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172	2-5 and 12-19	172:1-5: Hearsay (Va. R. S. Ct. 2:802); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	171:21-22
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195	18 (from "after") -22		
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235	22 [Referring to Def's Ex](Kipper 17)	Hearsay (Va. R. S. Ct. 2:802); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
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260	15-22 [Referring to Def's Ex](Kipper 15)	260:15-21:Hearsay (Va. R. S. Ct. 2:802); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Lack of Authentication (Va. R. S. Ct. 2:901)	
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**Deposition of Sergeant Peter Kouvelis
 Designated Representative – Los Angeles Police Department
 January 4, 2022**

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 March 1, 2022**

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34	1-17 and 22		
35	1-2, 7-11 and 17-22	35:17-22: Lack of Foundation, Speculation, Improper Opinion (Va. R. S. Ct. 2:701), Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
36	1-13	36:1-2: Lack of Foundation, Speculation, Improper Opinion (Va. R. S. Ct. 2:701), Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
37	7-11		
38	12-20	36:1-2: Lack of Foundation, Speculation, Improper Opinion (Va. R. S. Ct. 2:701), Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
39	12-13, 19 and 21-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
40	1-15	Hearsay (Va. R. S. Ct. 2:802), Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	40:16-41:2 41:16-18
41	19-22		
42	1-5		
45	11 (from "Ms.") – 22 [Replace "Exhibit 17" with Def Ex]		
46	5-19 and 22		
47	1-11 1 (from "did you assist") – 19		
48	3-15 and 19-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S.	

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52	7 (from "now") – 8 (through "18") [Replace "Exhibit 18" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
53	5-13 17 (from "Yes") – 22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
54	1-5 and 9-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
55	1-8 and 13-21	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
56	11-13 and 17-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
57	1-6 11 (from "I") – 18 20 (from "let's") – 21 [Replace "Exhibit 2" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
58	17-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
59	1-11 and 20-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
60	9-11 and 15-21	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	

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61	5-10	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
64	4-22 [Replace "Depp Exhibit 4" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
65	1-8 and 11-16	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
66	5-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
67	1-22	67:1-6: Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	67:7-22
68	1 and 7-22		68:1; 68:19-22
69	1-22	69:4-22: Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602, Improper Opinion (Va. R. S. Ct. 2:701)	69:1-3
70	1-6 and 11-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
71	1-13 and 17-20	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Improper Opinion (Va. R. S. Ct. 2:701)	
73	15-17 21 (from "I") – 22	73:22 (from "She"): Speculation, Improper	

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75	17-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
76	5-13 and 15-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
77	1-21	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
78	3-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Improper Opinion (Va. R. S. Ct. 2:701)	
79	1-20	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
80	1 [Replace "Exhibit 19" with Def Ex] 22 (from "did you")	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Lack of Foundation	
81	1-12 and 16-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Lack of Foundation, Speculation	81:16-22

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83	2-10 12 ("Exhibit 5" only) [Replace "Exhibit 5" with Def Ex] 21-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation, Lack of Foundation	
84	1-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
85	3-5, 9-11, 16-17 and 19-22	Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
86	1-9 and 19-22	86:1-9: Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Improper Opinion (Va. R. S. Ct. 2:701)	
87	1-17 19 (from "Exhibit") [Replace "Exhibit 6" with Def Ex]	87: 19 (from "Exhibit"): Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Lack of Foundation	
89	6-14 (through "right")	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
91	3-4, 8-14 and 18-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Improper Opinion (Va. R. S. Ct. 2:701)	
92	1-20	Improper Opinion (Va. R. S. Ct. 2:701), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
93	3-11	93:18 ("Exhibit 7"): Speculation, Lack of Personal Knowledge	

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	18 (“Exhibit 7” only) [Replace “Exhibit 7” with Def Ex]	(Va. R. S. Ct. 2:602), Hearsay (Va. R. S. Ct. 2:802), Lack of Foundation	
94	10 (from “At”) – 22	94:18-22: Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Hearsay (Va. R. S. Ct. 2:802)	
95	19 (from “Looking”) – 22	Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Hearsay (Va. R. S. Ct. 2:802)	
96	1-3	Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Hearsay (Va. R. S. Ct. 2:802)	
97	2 (from “Let’s”) [Replace “Exhibit 8” with Def Ex] 12-22	Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Hearsay (Va. R. S. Ct. 2:802)	
98	1-18	Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Hearsay (Va. R. S. Ct. 2:802)	
99	4 (from “And”) – 8 [Replace “Exhibit 8” with Def Ex] 15-22	Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Hearsay (Va. R. S. Ct. 2:802), Improper Opinion (Va. R. S. Ct. 2:701)	
100	1-10 12 (“Exhibit 9” only) [Replace “Exhibit 9” with Def Ex]	Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Improper Opinion (Va. R. S. Ct. 2:701), Hearsay (Va. R. S. Ct. 2:802)	
101	5-20	Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Hearsay (Va. R. S. Ct. 2:802)	

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104	1-17 20 (“Exhibit 11” only) [Replace “Exhibit 11” with Def Ex]	Improper Opinion (Va. R. S. Ct. 2:701), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
106	7 (from “were”) – 22	Hearsay (Va. R. S. Ct. 2:802)	
107	1-22	Speculation	
108	1	Speculation	
112	20-22 (through “13”) [Replace “Exhibit 13” with Def Ex]	Hearsay (Va. R. S. Ct. 2:802)	
114	21 (from “This”) – 22	Hearsay (Va. R. S. Ct. 2:802)	
115	1-19	Speculation	
119	18 (“Exhibit 14” only) [Replace “Exhibit 14” with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
121	9 (from “And”) – 22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
122	1-5 and 10-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
123	1-5 21 (“Exhibit 15” only) [Replace “Exhibit 15” with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
124	11-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
125	1-6	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
131	21 (from “I’m”) – 22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
132	1-2 and 11-16	Speculation, Hearsay (Va. R. S. Ct. 2:802)	

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135	1-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Improper Opinion (Va. R. S. Ct. 2:701)	
136	1-14 and 21-22	Speculation, Improper Opinion (Va. R. S. Ct. 2:701)	
137	1-22	Speculation, Improper Opinion (Va. R. S. Ct. 2:701), Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
138	1-16	Speculation, Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
141	1 (from "Has") – 2 5-9, 11-13, 15-17 and 19-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Foundation	
142	1-7 and 12-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
143	1-5	Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
145	3-20	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
146	19-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
147	1-2 and 6-20	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
148	11 (from "Has") – 22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal	

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151	21-22		
152	1-3 [Replace "Exhibit 21" with Def Ex] 11-17 [Replace "Exhibit 21" with Def Ex]		
156	5-13 and 20-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
157	1-8	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
158	4-6 and 10-15	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
159	4-6 and 8-22		
160	7-11 and 14-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation, Improper Opinion (Va. R. S. Ct. 2:701)	
161	1-5, 8 and 10-17	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
162	11-12 19 (from "I") – 21		
163	6-9	Hearsay (Va. R. S. Ct. 2:802)	
164	6-8 [Replace "Exhibit 21" with Def Ex]		
165	2-10 and 14-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
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167	1-10 and 13-14 15 (from "So") – 20 [Replace "Exhibit 21" with Def Ex] 22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation, Vague and ambiguous	
168	1-16 and 20-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation, Leading, Lack of Foundation	
169	1-8, 10-11, 13-16 and 21-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation, Lack of Foundation	
170	1-6	Leading, Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation, Lack of Foundation	
171	5-15 and 21-22	Leading, Lack of Foundation, Speculation,	
172	1-14	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
174	5-6 [Replace "Exhibit No. 4" with Def Ex] 9-14, 17-19 and 22	Hearsay (Va. R. S. Ct. 2:802), Leading, Lacks Foundation, Argumentative	
175	1-22	Hearsay (Va. R. S. Ct. 2:802)	
176	1-18	Hearsay (Va. R. S. Ct. 2:802), Argumentative, Leading, Lacks Foundation	
177	4-5, 9-11 and 19-20	Hearsay (Va. R. S. Ct. 2:802), Leading, Lacks Foundation, Argumentative	
178	2-9 and 22	Leading, Hearsay (Va. R. S. Ct. 2:802)	

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180	1-4 and 13-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
181	1 and 4-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
182	7-13 and 21-22 [Replace "Exhibit No. 6" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
183	3-7 and 9-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
184	3-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
185	5 (from "I'm") – 7 17-22 [Replace "Exhibit No. 7" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
186	1-16 and 19-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
187	3-16 and 22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
188	1-2 [Replace "Exhibit No. 8" with Def Ex] 6-13, 16, 18 and 20-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S.	

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190	13-21 [Replace Exhibit No. 9" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Lack of Foundation	
191	4-15 and 18-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Lack of Foundation	
192	1 (from "And") – 3 6-22	Leading, Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Lack of Foundation	
193	1 and 4-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Lack of Foundation	
194	1-15	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Lack of Foundation	
195	1 (from "I'm") – 22 [Replace Exhibit No. 11" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Speculation	
196	4-13 and 15-22	Hearsay (Va. R. S. Ct. 2:802), Speculation	
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201	5-22 [Replace "Exhibit No. 13" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802)	
202	1-7, 12-16 and 19-21	Leading	
203	8-15 [Replace "Exhibit No. 14" with Def Ex] 18-22	Hearsay (Va. R. S. Ct. 2:802)	
204	1-18 and 21-22	Hearsay (Va. R. S. Ct. 2:802), Improper Opinion (Va. R. S. Ct. 2:701), Leading	
205	1-4 and 12-22 [Replace "Deposition Exhibit 15" with Def Ex]	205:1-4: Improper Opinion (Va. R. S. Ct. 2:701), Leading	
206	1-22	Hearsay (Va. R. S. Ct. 2:802)	
207	2-5 and 16-22 [Replace "Deposition Exhibit No. 17" with Def Ex]	207:2-5: Improper Opinion (Va. R. S. Ct. 2:701), Leading 207:16-22: Hearsay (Va. R. S. Ct. 2:802)	
208	1-5 and 13-22 [Replace "Deposition Exhibit No. 18" with Def Ex]	208:1-5: Improper Opinion (Va. R. S. Ct. 2:701), Leading 208:13-22: Hearsay (Va. R. S. Ct. 2:802)	
209	1-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
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213	5-16 [Replace "Exhibit No. 19" with Def Ex] 18 (from "Did") – 22	Hearsay (Va. R. S. Ct. 2:802)	
214	1-6, 9-11 and 19-22 [Replace "Exhibit 21" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
215	1-14 and 16-19	Improper Opinion (Va. R. S. Ct. 2:701)	
216	2-13 14 (from "And") – 22		
217	1-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
218	4-8 and 10-20	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation, Improper Opinion (Va. R. S. Ct. 2:701), Leading	
219	2-4 and 13-22 [Replace "Exhibit No. 22" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802)	
220	1-6 and 9-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Leading	
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224	1-6 and 10-22	Improper Opinion (Va. R. S. Ct. 2:701), Speculation	
225	1-6, 10-13, 15 and 18-22	Improper Opinion (Va. R. S. Ct. 2:701), Speculation	
226	1-10 and 13-22	Improper Opinion (Va. R. S. Ct. 2:701), Speculation, Leading	
227	1-2, 6-16 and 20-22	Improper Opinion (Va. R. S. Ct. 2:701), Speculation, Leading, Lack of Foundation	
228	1-22	Improper Opinion (Va. R. S. Ct. 2:701), Speculation	
229	1, 4-9 and 12	Leading, Lack of Foundation	
230	11-21	Compound, Leading, Argumentative	
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232	1, 3-7 [Replace "Exhibit 21" with Def Ex] 10-22	Speculation, Improper Opinion (Va. R. S. Ct. 2:701), Lack of Foundation	
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235	3-22 [Replace "Exhibit 26" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
236	1-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Personal Knowledge (Va. R. S. Ct. 2:602), Speculation	
237	1-2, 12-13 and 17-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Foundation	
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240	16-22 [Replace "Deposition Exhibit No. 27" with Def Ex]	Speculation, Lack of Foundation	
241	1-9 and 16-19	Speculation, Lack of Foundation	
242	9-11	Irrelevant, Improper attorney testimony	
243	12-14	Irrelevant, Improper attorney testimony	
244	8-22 [Replace "Exhibit No. 28" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802)	
245	1-2, 4-8 and 21-22 [Replace "Exhibit No. 29" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Leading, Speculation	
246	1-5, 8-12 and 20-21 [Replace "Exhibit No. 30" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Speculation	
247	2-6, 10-18 and 22	Hearsay (Va. R. S. Ct. 2:802), Leading, Speculation, Lack of Foundation	
248	1 and 8-22 [Replace "Deposition Exhibit 34" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802)	
249	1-17 and 20-22	Hearsay (Va. R. S. Ct. 2:802)	
250	1-3 4 (from "And") – 7 10-14 and 15-16 [replace "30" with Def Ex] 18-22	Leading, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
251	1-22	Hearsay (Va. R. S. Ct. 2:802)	
252	1-22	Hearsay (Va. R. S. Ct. 2:802)	
253	1-10 and 13-15 17 (from "There's") – 18	Hearsay (Va. R. S. Ct. 2:802), Speculation, Leading	
254	3-8 and 15-22 [Replace "Exhibit No. 31" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Speculation	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
255	1-16 and 19-22	Hearsay (Va. R. S. Ct. 2:802), Speculation	
256	1, 4-5 and 13-22 [Replace "No. 35" with Def Ex]	Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
257	1-12	Hearsay (Va. R. S. Ct. 2:802)	
258	3 (from "I'm") – 22 [Replace "Deposition Exhibit No. 36" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802)	
260	8-16		
261	2 (from "What") – 4 7-14, 18-19 and 21-22	Hearsay (Va. R. S. Ct. 2:802), Lack of Foundation. Speculation, Improper Opinion (Va. R. S. Ct. 2:701)	
262	1-10 19 (from "I'm") – 22 [Replace "Deposition Exhibit No. 40" with Def Ex]	Speculation, Improper Opinion (Va. R. S. Ct. 2:701)	
263	1-22	Hearsay (Va. R. S. Ct. 2:802)	
264	1-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
265	1-3 and 6-22	Leading, Lack of Foundation, Hearsay (Va. R. S. Ct. 2:802)	
266	3-22	Leading, Lack of Foundation, Hearsay (Va. R. S. Ct. 2:802), Speculation	
267	1 (from "You") – 5 17-20 and 22	Irrelevant, Speculation	
268	3-13, 16-17 and 21-22	Irrelevant, Speculation, Hearsay (Va. R. S. Ct. 2:802)	
269	1-11, 13-16 and 19-22	Hearsay (Va. R. S. Ct. 2:802), Leading, Compound	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
270	1-5, 9-15 and 17-22	Speculation, Vague and Ambiguous	
271	1-22	Hearsay (Va. R. S. Ct. 2:802)	
272	1-9	Speculation	
273	2-7 and 10-14 [Replace "Depp's Exhibit No. 21" with Def Ex] 17 19-20 [Replace "41" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Speculation, Leading	
274	5-22 [Replace "Deposition Exhibit No. 41" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802)	
275	1-4, 8-10, 14-16 and 20-22	Speculation, Improper Opinion (Va. R. S. Ct. 2:701)	
276	1-3 and 6-15	Speculation	
279	6-11 and 14 [Replace "Depp's Exhibit No. 21" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Leading	
280	16-22 [Replace "Deposition Exhibit No. 48" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802), Lack of Foundation	
281	1-6, 9-12, 15, 17-19 and 22	Legal Conclusion, Leading, Speculation	
282	1-3, 6-10, 12-15 and 18-22	Hearsay (Va. R. S. Ct. 2:802), Speculation	
283	1-2, 5, 13-15, 17-20 and 22	Leading, Hearsay (Va. R. S. Ct. 2:802)	
284	1	Hearsay (Va. R. S. Ct. 2:802)	
285	9-14 and 16-21	Hearsay (Va. R. S. Ct. 2:802), Leading	
286	7 (from "remember") – 13 15-21	Hearsay (Va. R. S. Ct. 2:802), Leading	
287	1-4, 6-13, 15-17 and 19-22	Hearsay (Va. R. S. Ct. 2:802), Leading	
288	2-3 4 (from "I'm") – 18 [Replace "Deposition Exhibit No. 52" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
289	12-22	Hearsay (Va. R. S. Ct. 2:802), Speculation, Lack of Personal Knowledge	
290	1-3, 7-15, 17-18 and 21-22	Speculation, Improper Opinion (Va. R. S. Ct. 2:701)	
291	1-5 and 8-22	Hearsay (Va. R. S. Ct. 2:802)	
292	1, 4-6, 9-12, 15, 17 and 19-22	Leading, Improper Opinion (Va. R. S. Ct. 2:701)	
293	1-3, 6-14 and 16-18	Improper Opinion (Va. R. S. Ct. 2:701)	
294	18-20	Leading, Lack of Personal Knowledge	
295	1, 14-18 and 21-22	Leading, Lack of Personal Knowledge, Improper Opinion (Va. R. S. Ct. 2:701)	
296	1-9 10 (from "Are") – 12 15, 17-19 and 22	Improper Opinion (Va. R. S. Ct. 2:701), Leading	
297	1-9 and 12-16	Improper Opinion (Va. R. S. Ct. 2:701)	
298	6-9 and 12-14	Improper Opinion (Va. R. S. Ct. 2:701)	
299	4 (from "The") – 9 13-22	Improper Opinion (Va. R. S. Ct. 2:701)	
300	1 9 (from "Did") – 10 13-14 and 16-19	Improper Opinion (Va. R. S. Ct. 2:701), Lack of Foundation	
301	1 2 (from "What") – 5 [Replace "Deposition – Depp Deposition Exhibit No. 21" with Def Ex] 9-13 and 17-18	Improper Opinion (Va. R. S. Ct. 2:701), Legal Conclusion, Speculation, Lack of Foundation, Hearsay (Va. R. S. Ct. 2:802)	

**Deposition of Armand Lemoyne
Designated Representative – Los Angeles Police Department
March 9, 2021**

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
6	10-14 and 22		
7	1-8 18-19 [Replace "Exhibit 1" with Def Ex]		
8	1-22	8:7-18: Relevance (Va. R. S. Ct. 2:402).	
9	1-5, 10-16 and 21-22		
10	1-22	10:3-13: Relevance (Va. R. S. Ct. 2:402) 103:15-22: Relevance (Va. R. S. Ct. 2:402)	
11	1-5 and 15-22	11:1-4: Relevance (Va. R. S. Ct. 2:402) 11:15-22: Relevance (Va. R. S. Ct. 2:402)	
12	1-10 and 21-22	12:1-5: Relevance (Va. R. S. Ct. 2:402) 12:8-10: Relevance (Va. R. S. Ct. 2:402)	
13	1-22	13:7-10: Relevance (Va. R. S. Ct. 2:402) 13:14: Relevance (Va. R. S. Ct. 2:402)	
14	1-8	14:2-5: Relevance (Va. R. S. Ct. 2:402)	
17	15 (from "Now") – 22	17:15-19: Relevance (Va. R. S. Ct. 2:402)	
18	1-14	18:7-8: Relevance (Va. R. S. Ct. 2:402) 18:12: Relevance (Va. R. S. Ct. 2:402)	
19	1-2 and 8-22	19:1-2: Relevance (Va. R. S. Ct. 2:402); Beyond Scope of List of Designated Deposition Topics. 19:13-16: Relevance (Va. R. S. Ct. 2:402) 19:18-22: Relevance (Va. R. S. Ct. 2:402);	19:3-6.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Vague & Ambiguous as to "around"; Beyond Scope of List of Designated Deposition Topics	
20	1, 4-8 and 11-22	<p>20:6-8: Relevance (Va. R. S. Ct. 2:402); Beyond Scope of List of Designated Deposition Topics</p> <p>20:18-19: Relevance (Va. R. S. Ct. 2:402)</p> <p>20:20-21: Relevance (Va. R. S. Ct. 2:402); Speculation (Va. R. S. Ct. 2:602).</p>	<p>20:2-3.</p> <p>20:9-10.</p>
21	1, 5-15 and 17-18	<p>21:5-6: Relevance (Va. R. S. Ct. 2:402)</p> <p>21:11-15: Relevance (Va. R. S. Ct. 2:402); Speculation (Va. R. S. Ct. 2:602).</p>	<p>21:3-4.</p> <p>21:16.</p>
27	17-22	27:17-20: Relevance (Va. R. S. Ct. 2:402)	
28	1-15, 17 and 20-22	<p>28:3-6: Relevance (Va. R. S. Ct. 2:402)</p> <p>28:12-17: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Vague & Ambiguous.</p>	28:16; 28:18-19.
29	1-8, 10 and 13-22	<p>29:6-8: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)</p> <p>29:18-20: Relevance (Va. R. S. Ct. 2:402)</p>	29:9; 29:11.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
30	1-8		
31	20 (from "In") – 22	31:20-22: Relevance (Va. R. S. Ct. 2:402)	
32	1-13 and 20-22	32:7-9: Relevance (Va. R. S. Ct. 2:402) 32:11-13: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Compound; Vague & Ambiguous; Beyond Scope of Designated Deposition Topics.	32:14-19
33	1-11 and 13-18	33:9-11: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Compound; Vague & Ambiguous; Beyond Scope of Designated Deposition Topics.	33:12.
39	22 (from "If")		39:12-14.
40	1-5 and 7-22	40:1-5: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Vague & Ambiguous; Calls for Conclusion. 40:8: Relevance (Va. R. S. Ct. 2:402) 40:18-22: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Vague & Ambiguous;	40:6.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Compound; Calls for Conclusion	
41	3-5		41:1-2.
45	3 (from "Sergeant") – 5 8-14 and 18-22	45:3-5: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602) 45:10-14: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602) 45:20-46:1 Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802); Vague & Ambiguous.	45:6-7. 45:15-16.
46	1 and 5-9 [Replace "Exhibit 14" with Def Ex] 12-22	46:12-15: Relevance (Va. R. S. Ct. 2:402) 46:17-19: Relevance (Va. R. S. Ct. 2:402) 46:21-22: Relevance (Va. R. S. Ct. 2:402)	46:2.
47	1-4	47:1-4: Relevance (Va. R. S. Ct. 2:402)	
50	5-8 and 10-11	50:5-8: Relevance (Va. R. S. Ct. 2:402); Calls for a Conclusion as to Interpretation of Document That Speaks for Itself	50:1-2; 50:9.
53	20 (from "Now") – 22	53:20-22: Relevance (Va. R. S. Ct. 2:402)	
54	1-15 and 18-21	54:1: Relevance (Va. R. S. Ct. 2:402)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		54:3-5: Relevance (Va. R. S. Ct. 2:402) 54:7-14: Relevance (Va. R. S. Ct. 2:402); Calls for a Conclusion as to Interpretation of Document That Speaks for Itself 54:18-21: Relevance (Va. R. S. Ct. 2:402); Speculation (Va. R. S. Ct. 2:602); Vague & Ambiguous; Poses an Incomplete Hypothetical	54:16-17. 54:22.
55	7-8		55:1; 55:3-4.
57	16 (from "Is") – 21	57:16-21: Relevance (Va. R. S. Ct. 2:402); Speculation (Va. R. S. Ct. 2:602); Vague & Ambiguous; Poses an Incomplete Hypothetical; Calls for a Conclusion as to Interpretation of Document That Speaks for Itself; Misstates Document	57:13-15; 57:22.
58	1 17 (from "And") -22	58:17-59:1: Relevance (Va. R. S. Ct. 2:402); Speculation (Va. R. S. Ct. 2:602); Vague & Ambiguous; Poses an Incomplete Hypothetical; Calls for a Conclusion as to Interpretation of Document That Speaks for Itself; Misstates Document	
59	1 and 6-16	59:11-15: Relevance (Va. R. S. Ct. 2:402)	59:2-5.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
60	6 (from "I'm") – 7 [Replace "Deposition Exhibit 3" with Def Ex]		
63	4 (from "Have") – 15	63:4-7: Relevance (Va. R. S. Ct. 2:402) 63:9-13: Relevance (Va. R. S. Ct. 2:402)	
68	17 (from "Do") – 19 and 22	68:17-19: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	68:20-21.
69	1, 3-5 and 9-10	69:3-5: Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802);	69:6-7.
73	9 (from "Would") – 13 18-22	73:9-13: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Compound; Vague & Ambiguous	
74	1		
88	13 (from "Now") -22	88:13-22: Relevance (Va. R. S. Ct. 2:402).	
89	1-8	89:1-2: Relevance (Va. R. S. Ct. 2:402)	
92	19 (from "And") – 22	92:19-22: Relevance (Va. R. S. Ct. 2:402)	
93	1-10	93:1-9: Relevance (Va. R. S. Ct. 2:402)	
95	14 (from "is") – 20	95:14-20: Relevance (Va. R. S. Ct. 2:402); Poses an Incomplete Hypothetical; Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602);	95:21-22
96	2-22	96:2-22: Relevance (Va. R. S. Ct. 2:402)	96:1
97	1-7 and 11 13 (from "This") – 15	97:1-7: Relevance (Va. R. S. Ct. 2:402); Vague & Ambiguous; Lack of Foundation, Lack of	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Document Speaks for Itself 97:13-14: Relevance (Va. R. S. Ct. 2:402)	
103	1 (from "I'm") – 10 [Replace "Deposition Exhibit 49" with Def Ex] 13-22	103:13-14: Relevance (Va. R. S. Ct. 2:402) 103:16-17: Relevance (Va. R. S. Ct. 2:402) 103:19-22: Relevance (Va. R. S. Ct. 2:402)	
104	1-11 and 21-22	104:1-3: Relevance (Va. R. S. Ct. 2:402) 104:5-11: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Compound; Poses an Incomplete Hypothetical; Calls for a Legal Conclusion; Calls for Inadmissible Expert Opinion (Va. R. S. Ct. 2:701); Vague & Ambiguous.	104:12-20.
105	1-2		
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107	1-10 and 12-14	107:1-4: Relevance (Va. R. S. Ct. 2:402) 107:6-9: Relevance (Va. R. S. Ct. 2:402)	107:11.
115	14-22	115:14-16: Relevance (Va. R. S. Ct. 2:402) 115:18-21: Relevance (Va. R. S. Ct. 2:402); Compound; Vague & Ambiguous.	
116	6-10 and 12-17		116:1-2.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		116:6-10: Relevance (Va. R. S. Ct. 2:402); Asked & Answered.	116:11.
122	13 (From "I") – 22	122:13:22: Relevance (Va. R. S. Ct. 2:402)	
123	1-22	123:1-22: Relevance (Va. R. S. Ct. 2:402)	
124	1-22	124:1-22: Relevance (Va. R. S. Ct. 2:402)	
125	1-10	125:1-10: Relevance (Va. R. S. Ct. 2:402)	
127	22 (from "So")		
128	1-20	128:1-20: Relevance (Va. R. S. Ct. 2:402)	
133	6 (from "Do") – 20	133:6-20: Relevance (Va. R. S. Ct. 2:402)	
139	16 (from "So we") – 22	139:16-22: Relevance (Va. R. S. Ct. 2:402)	
140	1-19	140:1-19: Relevance (Va. R. S. Ct. 2:402)	
145	16 (from "Exhibit") [Replace "Exhibit 14" with Def Ex]		
146	3 (from "Ms.") – 22	146:3-22: Relevance (Va. R. S. Ct. 2:402)	
147	1-5	147:1-5: Relevance (Va. R. S. Ct. 2:402)	
150	10-15 and 18-22	150:10-22: Relevance (Va. R. S. Ct. 2:402)	
151	1-5	151:1-5: Relevance (Va. R. S. Ct. 2:402)	
153	7-10 and 14-22	153:7-22: Relevance (Va. R. S. Ct. 2:402)	
154	1	154:1: Relevance (Va. R. S. Ct. 2:402)	
155	14 (from "Can") -22	155:14-22: Relevance (Va. R. S. Ct. 2:402)	
156	1-13	156:1-13: Relevance (Va. R. S. Ct. 2:402)	
157	1 (from "Did") – 12 19-22	157:1-12: Relevance (Va. R. S. Ct. 2:402) 157:19-22: Relevance (Va. R. S. Ct. 2:402)	
158	1-17	158:1-17: Relevance (Va. R. S. Ct. 2:402)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
159	2-7	159:2-7: Relevance (Va. R. S. Ct. 2:402)	
167	4-8 and 12-22	167:4-22: Relevance (Va. R. S. Ct. 2:402)	
168	1-6 and 14-19	168:1-6: Relevance (Va. R. S. Ct. 2:402) 168:14-19: Relevance (Va. R. S. Ct. 2:402)	
181	3 (from "I") – 6 9-13 and 17	181:3-17: Relevance (Va. R. S. Ct. 2:402)	
185	4 (from "you") – 12 17-22	185:4-12: Relevance (Va. R. S. Ct. 2:402) 185:17-22: Relevance (Va. R. S. Ct. 2:402)	
186	1-2	186:1-2: Relevance (Va. R. S. Ct. 2:402)	
189	12 (from "Now") -22	189:12-22: Relevance (Va. R. S. Ct. 2:402)	
190	1-11, 14-15 and 20-22	190:1-8: Relevance (Va. R. S. Ct. 2:402) 190:9-11: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602). 190:20-22: Relevance (Va. R. S. Ct. 2:402)	190:12-13.
191	1-6	191:1-6: Relevance (Va. R. S. Ct. 2:402)	
193	4-10 [Replace "Plaintiff's Exhibit 15" with Def Ex] 14-22	193:4-10: Relevance (Va. R. S. Ct. 2:402); Vague & Ambiguous; Beyond the Scope of Designated Deposition Topics; Compound. 193:14-22: Relevance (Va. R. S. Ct. 2:402)	193:11-13.
194	1-3	194:1-3: Relevance (Va. R. S. Ct. 2:402)	
195	12 (from "So") – 22	195:12-22: Relevance (Va. R. S. Ct. 2:402)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
196	1	196:1: Relevance (Va. R. S. Ct. 2:402)	
200	10 (from "If") – 14 21-22	200:10-14: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence; Misstates Prior Testimony; Mischaracterizes Document, Which Speaks for Itself; Vague & Ambiguous; 200:21-22: Relevance (Va. R. S. Ct. 2:402)	200:15-20.
201	1-3	201:1-3: Relevance (Va. R. S. Ct. 2:402)	
208	16 (from "You") – 21	208:16-21: Relevance (Va. R. S. Ct. 2:402); Leading	208:22.
209	6-14 and 19-22	209:6-8: Relevance (Va. R. S. Ct. 2:402) 209:9-14: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Vague & Ambiguous; Leading; Poses an Incomplete Hypothetical; Misstates Prior Testimony.	209:15-18.
214	2 (from "let me refer") – 11 12 (from "So") – 14 21	214:2-10: Relevance (Va. R. S. Ct. 2:402) 214:12-20: Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Speculation (Va. R. S. Ct. 2:602); Beyond the Scope of the Noticed Deposition Topics	214:15-20.

**Deposition of Debra Lloyd, APRN
March 8, 2022**

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
11	12-20		
17	16-19	Relevance (R. 2:402)	
21	4-9 and 20-22		
22	1-22		
23	1-6		
24	2-13 and 18-22		
25	1-22		
26	1-13		
29	29 (from "How") – 2 20 (from "Did") – 22		
30	1		
32	1-5 and 9	Relevance (R. 2:402)	
34	9-17		
35	5 (from "Was") – 10 22		
36	1 and 16-22		
37	1-5 and 10-11		
39	10-17 [Replace "Exhibit 1" with Def Ex 1069]		
40	12-22		
41	1-8 15 (from "let's") – 22		
42	1-19		
43	15-22		
44	1-18 and 21-22	Lines 14-18, 21-22: hearsay (R. 2:802); relevance (R. 2:402); improper character evidence (R. 2:404); unfair prejudice (R. 2:403)	44:19
45	1-4 and 6	Hearsay (R. 2:802); relevance (R. 2:402); improper character evidence (R. 2:404); unfair prejudice (R. 2:403)	45:5, 7-10
46	5-16 and 19	Hearsay (R. 2:802); relevance (R. 2:402); improper character evidence (R. 2:404);	46:17

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		unfair prejudice (R. 2:403)	
47	7-17 and 20	hearsay (R. 2:802); relevance (R. 2:402); improper character evidence (R. 2:404); unfair prejudice (R. 2:403)	47:18
48	9-20	Lines 21-22: hearsay (R. 2:802); relevance (R. 2:402); improper character evidence (R. 2:404); unfair prejudice (R. 2:403)	
49	2-5 and 12-22	Lines 2-5, 7: hearsay (R. 2:802); relevance (R. 2:402); improper character evidence (R. 2:404); unfair prejudice (R. 2:403)	50:6
50	1-5, 7, and 16-19		
52	11-13 [Replace "Lloyd Exhibit 2" with Def Ex 263]		
54	1 (from "do") – 8 10 (from "the gray") -19 21-22	Lines 19, 21-22: hearsay (R. 2:802); unfair prejudice (R. 2:403)	54:20
55	1-8 and 15-22	hearsay (R. 2:802); improper character evidence (R. 2:404); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	55:9, 11
56	1 9-15 [Replace "Lloyd Exhibit 2" with Def Ex 263]		
57	3-8, 12-16 and 22	hearsay (R. 2:802); improper character evidence (R. 2:404); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	57:9-11 57:17-19
58	1-3		
59	3-7 [Replace "Lloyd Exhibit 2" with Def Ex		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
	269] 12 (from "Do") – 13 18-19		
61	3-6 and 10-17		
62	1-3, 12-19 [Replace "Lloyd 4" with Def Ex 269] 22 (from "And")		
63	1-2, 5-15 and 17	hearsay (R. 2:802); improper character evidence (R. 2:404); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	63:3-4 63:16
64	4 (from "So") - 6 [Replace "Lloyd Exhibit 1" with Def Ex 1069] 8 (from "And") - 17	hearsay (R. 2:802); improper character evidence (R. 2:404); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	64:18-19, 21-22 65:1-4
65	19-21		
67	1-4 and 16-22	hearsay (R. 2:802); improper character evidence (R. 2:404); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
68	6-9 18 (from "Lloyd Exhibit 5")- 22 [Replace "Lloyd Exhibit 5 with Def Ex 283]		
69	1-15 and 19-22	Lines 19-22: relevance (R. 2:402)	69:16-18
70	1-7 19 (from "Do") – 21	Lines 1-7: relevance (R. 2:402)	
71	1-2 [Replace "Exhibit 1" with Def Ex 1069] 12-22		73:12-14, 17
72	1-2		
74	11-22	Improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation	75:5-12

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75	1-4 and 13-19	Improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); hearsay (R. 2:802)	75:5-12
76	11 (from "And") – 22	Improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); hearsay (R. 2:802)	78:1-3, 6
77	1-22	Improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); hearsay (R. 2:802)	
78	7-17 and 22 (from "And")	Improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation/ personal knowledge (R. 2:602); hearsay (R. 2:802)	
79	1-2, 4-7 and 21-22	Improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); hearsay (R. 2:802)	79:8-11
80	1-3 and 6-22	Improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation	80:4-5 81:3-5, 9-10

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82	21 (from "Ms.") – 22 [Replace "Exhibit 6" with Def Ex 300]		
83	1-4 and 7-22	Relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); hearsay (R. 2:802)	
87	10-11 [Replace "Exhibit 8" with Def Ex 307] and 22 (from "Mr.")		
88	1-11		
89	22		
90	1-2 [Referring to Exhibit 9 = Def Ex 304]		
93	19-22	Improper character evidence (R. 2:404); lacks foundation / personal knowledge (R. 2:602); hearsay (R. 2:802)	
94	1-8 and 18-22	Lines 1-8: Improper character evidence (R. 2:404); lacks foundation / personal knowledge (R. 2:602); hearsay (R. 2:802)	94:9-10, 16
95	4 and 11 [Replace "Exhibit 10" with Def Ex 319]		
96	3-14	Relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); hearsay (R. 2:802)	
97	12-17		
98	17 (from "Exhibit") – 22 [Replace "Exhibit 11 with Def Ex 328]		
99	1-16		
100	6 (from "And") – 11	Hearsay (R. 2:802);	100:12

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101	4-5 and 10-14		101:6-9
102	19-22 [Replace "Exhibit 12" with Def Ex 335]		
103	1-13, 16-18 and 22	Relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
104	1-22	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
105	1-22	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
106	1-22	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
107	1-15 16 (from "And") – 22	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
108	1-13 and 17-18	Hearsay (R. 2:802);	108:14-16

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
	20 (from "So") -21	improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); assumes facts not in evidence	
109	1-2 and 11-22	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602)	
110	1-22	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
111	1-3	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
113	1-3		
114	11-12 and 15-22	Improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence	
117	2-22 [Replace "Exhibit 13" with Def Ex 336]	Hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	

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119	1-7 and 9-12	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
120	4-5 and 8-22	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
121	1-2 and 22	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
122	1-3 and 7-21	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
123	1-6	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	

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125	1-2 and 17-22 [Replace "Lloyd 14" with Def Ex 351]	Hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602)	
126	1-12 and 22 (from "as")	Hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602)	
127	1-14 and 20-22	Hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602)	
128	1-3 and 5-16		
129	10 (from "do") – 22		
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134	1-2 and 4-9	Lines 1-2: compound	134:3
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137	11-19		
138	14 (from "Do") – 16 and 21	Hearsay (R. 2:802); relevance (R. 2:402); lacks foundation / personal knowledge (R. 2:602)	138:17-20
139	8-21 [Replace "Exhibit 15" (2 pgs) with Def Exs 614+391]	Hearsay (R. 2:802); relevance (R. 2:402); lacks foundation / personal knowledge (R. 2:602)	
140	7 (from "Do") – 15, and 20-21	Hearsay (R. 2:802); relevance (R. 2:402); lacks foundation / personal knowledge (R. 2:602)	140:16-19
141	10-22	Hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
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144	8 (from "If") – 22	Hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
145	1	Lacks foundation / personal knowledge (R. 2:602)	
147	6 (from "Ms.") – 9 16 (from "Exhibit") – 17 (through "145") [Replace "Exhibit 16" with Def Ex 395]] 20-22		
148	1-22	Relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
149	1-22	Unfair prejudice (R. 2:403); relevance (R. 2 :402)	
150	1-12		
151	2-22		
152	1-16		
153	12 (from "And") – 21		
155	2-22 [Replace "Lloyd 17" with Def Ex 405]		
156	1-5, 9 and 19-22 [Replace "Lloyd Exhibit 18" with Def Ex 407]		
157	1 19 (from "So") – 22	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R.	

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159	1-7 and 9-14	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
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161	1 (from "And") – 22	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
162	1 (from "Do") – 3 and 12-22	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
163	1 and 5-22 [Replace "Exhibit 1" with Def Ex 1069]	Hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602)	
164	1-6, 8-10 and 14-20	Hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602)	164:7, 11-13, 21-22
165	2, 4-6 and 12-22	Hearsay (R. 2:802); improper character evidence (R. 2:404); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602)	165:7-11
166	1 and 4-22	Hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602)	
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169	1-21 [Replace "Lloyd 19" with Def Ex 443]	Lines 11-17: Hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602) Lines 20-21: assumes facts not in evidence; calls for speculation (R. 2:602)	169:22 – 170:3 170:4-6
170	4-6 and 8-14		
171	1-14 [Replace "Exhibit 20" with Def Ex 455] 17-22	Line 22: Hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks personal knowledge (R. 2:602)	
172	1-18	Hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks personal knowledge (R. 2:602)	
173	5 (from "And") -10 12 (from "And") – 22 [Replace "Exhibit 1" with Def Ex 1069]	Hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks personal knowledge (R. 2:602)	
174	1-22	Hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks personal knowledge (R. 2:602); relevance (R. 2:402)	
175	1-6	Hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks personal knowledge (R. 2:602); relevance (R. 2:402)	
176	4 (from "And") – 7 21 (from "Ms.") – 22 [Replace "Exhibit 21" with Def Ex 414]	Lines 4-7: hearsay (R. 2:802); relevance (R. 2:402)	
177	1-19	Relevance (R. 2:402); lacks foundation / personal knowledge (R. 2:602)	
178	5-8 and 11-22	Hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks personal knowledge (R. 2:602);	

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191	9 [Replace "Exhibit 24" with Def Ex 247] 11-22		
192	1-8 and 15-22		
193	10-20 [Referring to Exhibit 23; Replace with Def Ex 1076]	193:21-22: Incomplete/ Unintelligible	194:1-10
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203	7-8 [Replace "Exhibit 23" with Def Ex 1076] 21-22		
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208	5 ("So") – 17		
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240	1-7		
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246	17-18 [Replace "Exhibit14" with Def Ex 351] 22 (from "I'd")		

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251	5 (from "Do") – 9 12-14		251:15-252:4
252	13-14 (through "23") [Replace "Exhibit 23" with Def Ex 1076]		
253	2-5 9 (from "Directing") – 17		253:6-8
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256	1-2 7 (from "Do") – 13 15-18		
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262	10-22 [Referring to Exhibit 27; Replace with Def Ex 402]		
263	1-18 and 22		263:19-21
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267	4-18 (through "23") [Replace "Exhibit 23" with Def Ex 1076]		267:1-3
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11	20 (from "is") – 22	11:20-22: Relevance (Va. R. S. Ct. 2:402)	
12	1-16	12:1-16: Relevance (Va. R. S. Ct. 2:402)	
17	12-22 [Replace "Exhibit Number 3" with Def Ex]	17:12-22: Relevance (Va. R. S. Ct. 2:402)	
18	1-15 and 18	18:1-13: Relevance (Va. R. S. Ct. 2:402) 18:14-15: Relevance (Va. R. S. Ct. 2:402); Vague & Ambiguous.	18:17 ; 18:20.
19	1-3 5 (from "But") -8 [Replace "Exhibit Number 3" with Def Ex]12-15 and 17-19 (through "page")	19:1-3: Relevance (Va. R. S. Ct. 2:402) 19:5-8: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602) 19:17-19: Relevance (Va. R. S. Ct. 2:402)	19:10-11.
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25	1-2 and 8-15 17 (from "Mr.") – 20	25:1-2: Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Document Speaks for Itself. 25:17-20: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Vague & Ambiguous.	25:3-4. 25:21-22.
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33	20 (from "And") – 22	33:20-22: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Beyond the Scope of the Designated Deposition Topics; Vague & Ambiguous.	
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38	1-5 and 8-22	38:1-22: Relevance (Va. R. S. Ct. 2:402)	
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40	1-6 7 (from "So") – 22	40:1-22: Relevance (Va. R. S. Ct. 2:402)	
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49	1-22 [Replace "Lopez Exhibit Number 3" with Def Ex]	49:1-22: Relevance (Va. R. S. Ct. 2:402)	
50	1 and 20-22	50:20-22: Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Document Speaks for Itself.	
51	5-22	51:5-22: Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Document Speaks for Itself	51:1-2.
52	1-5	52:1-5: Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Document Speaks for Itself	52:6-8.
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54	1-7 12 (from "Let's") – 19	54:1-7: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Document Speaks for Itself. 54:12-19: Relevance (Va. R. S. Ct. 2:402)	54:9-10.
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57	2-22	57:2-18: Relevance (Va. R. S. Ct. 2:402).	

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64	18 (from "Then") – 22	64:18-22: Relevance (2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	
67	1-11, 14 and 20-21	67:1-8: Relevance (Va. R. S. Ct. 2:402). 67:9-14: Relevance (2:402); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Document Speaks for Itself.	67:12; 67:15-18.
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76	1-14, 17-19 and 21-22	76:1-13: Relevance (Va. R. S. Ct. 2:402) 76:14: Relevance (Va. R. S. Ct. 2:402); Beyond the Scope of the Noticed Deposition Topics. 76:17-22: Relevance (Va. R. S. Ct. 2:402)	76:15-16.
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17	1-4 12 (from "in") – 22	Lines 12-22: relevance (Va. R. S. Ct. 2:402)	
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34	13 and 18-22	<p>Line 13: Hearsay (Va. R. S. Ct. 2:802), lacks personal knowledge (Va. R. S. Ct. 2:602); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)</p> <p>Lines 18-22: assumes facts not in evidence; speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)</p>	34: 11-12, 16-17
35	7-16 and 18-19	Lines 7-16: hearsay (Va. R. S. Ct. 2:802), assumes facts not in evidence, lacks personal knowledge/ speculation (Va. R. S. Ct. 2:602); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	35:1-5 35:20-22

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36	5-13 and 16-22	<p>Lines 5-8: Incomplete designation (Counsel designated an answer that was not in response to the question posed); lacks personal knowledge/speculation (Va. R. S. Ct. 2:602), assumes facts not in evidence; relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)</p> <p>Lines 9-13, 16-22: vague and ambiguous, calls for speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)</p>	36:4, 14-15
37	1-7 and 11-22	<p>Calls for speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)</p>	37:8-10

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39	3-9 and 12-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	39:10-11
40	1, 4-5 and 7 9 (from "You") – 18 21-22	All lines: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404) Lines 16-18, 21-22: vague, ambiguous	40:19-20
41	1-10 and 22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
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45	1-6 and 9-18	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); vague; ambiguous; compound	45:7-8
46	6-9 and 13-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); vague; ambiguous; compound	46:10-11
47	1-5 and 8-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
48	1-16	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
50	8-22 [Replace "Mandel Deposition Exhibit No. 2" with Def Ex]	Relevance (Va. R. S. Ct. 4:202); unfair prejudice (Va. R. S. Ct. 4 :403); assumes facts not in evidence	
51	1-22	Lines 1-2: Relevance (Va. R. S. Ct. 4:202); unfair prejudice (Va. R. S. Ct. 4 :403); assumes facts not in evidence Lines 3-22: hearsay (Va. R. S. Ct. 2:802);	

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53	1-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	
54	17-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	
55	1-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	
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58	1-3 and 16-19	Lines 1-3: speculation / lacks personal knowledge (Va. R. S. Ct. 2:602) Lines 16-19: relevance (Va. R. S. Ct. 2:402)	58:20-59:1
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60	3-5 15 (from "With") – 22	Lines 3-5: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402) Lines 15-22: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:403)	60:1-2
61	1-5 and 13-17	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:403)	
64	5 (from "Did") – 12 (through "checks")	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	64:12 (from "It") - 14

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66	1-14 and 16-22	<p>Lines 1-14, 16: Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence</p> <p>Lines 17-22: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence</p>	
67	3-16 and 19-22	<p>All lines: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence</p> <p>Lines 14-16, 19-22: speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)</p>	67:1-2 67:17-18
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71	1, 5-8 and 11-12	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	71:2-4
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75	1-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
76	1-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	
77	1-14 and 17-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	77:15-16
78	1-2 and 4-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	78:3
79	1-12 and 15 17 (from "Now") – 22	Lines 1-12, 15: Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct.	79:13-14

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81	5-21	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence; improper character evidence (Va. R. S. Ct. 2:404)	
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83	18 (from "Mr.") -19 (through "No. 3") [Replace "Exhibit 3" with Def Ex]		
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88	1-4 13-19 [Replace "Exhibit No. 5" with Def Ex] 21-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); lacks foundation / calls for speculation (Va. R. S. Ct. 2:602); assumes facts not in evidence	
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90	1-2, 6-10, 14-15 and 19-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); lacks foundation / calls	90:3-5 90:11 90:16-18

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94	3-21 [Referring to Exhibit 2; Replace with Def Ex]	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	94:22 – 95:2
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97	1 12-22 [Replace "Deposition Exhibit No. 7" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	97:2-3
98	1-2, 5-7, 10-16 and 20-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	98:3-4 98:8-9 98:17-19
99	1-3 and 6-7 14 (from "do") – 17 21-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	99:4-5 99:18-20
100	1-3	All lines: Relevance (Va. R. S. Ct. 2:402); unfair	100:14-15 100:22 – 101:4

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	7-8 [Replace "Exhibit 8" with Def Ex (Video)] 13 and 19-21	<p>prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence</p> <p>Lines 19-21: vague, ambiguous</p>	
101	5-6, 8-9, 12-13 and 16-22	<p>Lines 5-6: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence</p> <p>Lines 8-9, 12-13, 16-22: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence</p>	101:10-11 101:14-15
102	(through "up") (from "Exhibit") - 22 [Replace "Exhibit No. 2" with Def Ex]	Lines 13-22: hearsay (Va. R. S. Ct. 2:802); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	

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103	1-3, 6, 8-9, 12-14 and 17-22	Hearsay (Va. R. S. Ct. 2:802); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	103:4-5, 7
104	1-16 and 19-21	Hearsay (Va. R. S. Ct. 2:802); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	104:17-18
105	2-9, 18-20 and 22	Speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	
106	1-2 and 4-5 (through "2015") 8 (from "Mr.") – 12 15-22	Speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	
107	1-2, 5-6, 10-17 and 20-21	Speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	107:3-4 107:7-9 107:22 – 108:1
108	2, 4-10 and 15-22	Lines 2, 4-6: Speculation / lacks personal knowledge (Va. R. S. Ct. 2:602) Lines 7-10, 15-22: relevance (Va. R. S. Ct. 2:402); improper hypothetical; unfair prejudice (Va. R. S. Ct. 2:403)	
109	1-13 and 17-21	Speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence; improper hypothetical	109:14-16

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110	2, 4-12 and 16-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403); lack of personal knowledge (Va. R. S. Ct. 2:602)	110:13-15
111	1-3 and 9-22	Lack of personal knowledge / speculation (Va. R. S. Ct. 2:602); hearsay (Va. R. S. Ct. 2:802)	
112	1-8, 11-16 and 19-21		
114	1 (from "And") – 5 13 -22 [Replace "Deposition Exhibit 9" with Def Ex]	Lines 13-22: lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
115	1-10, 14-17 and 22	Hearsay (Va. R. S. Ct. 2:802); lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	115:11-13
116	1-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	
117	1-11 and 18	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper	117:12-16

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		character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	
118	10 (from second "I asked") – 12 15	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	
119	6 (from "there") – 11	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence; jury confusion (Va. R. S. Ct. 2:403)	
120	14-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence; jury confusion (Va. R. S. Ct. 2:403)	
121	9-20 [Replace "Exhibit No. 10" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	
122	6-13 and 20-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence	122:15-19
123	1-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair	

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124	1-8 and 12-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	124:9-11
125	1-2 12-22 [Replace "Deposition Exhibit No. 11" with Def Ex]	All lines: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence Line 22: hearsay (Va. R. S. Ct. 2:802)	
126	1-4 and 9-19	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence	126:5-8 126:20-22
127	1 and 3-13	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence	
128	17-22 [Replace "Exhibit" with Def Ex] (Referring to Depo Ex 2)	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	

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129	1-19	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	129:20-22
130	1-3, 5-12 and 17-22	<p>Lines 1-3, 5: Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence</p> <p>Lines 6-12, 17-22: Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); compound; calls for speculation (Va. R. S. Ct. 2:602); assumes facts not in evidence</p>	130:13-16
131	1-5, 9-10, 12-18 and 22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); assumes facts not in evidence	131:6-8

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132	1 (“been marked as Exhibit No... 12” only) 2 (from “And”) – 8 17 -22 [Replace “Deposition Exhibit No. 13” with Def Ex]	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); assumes facts not in evidence	
133	1-10 and 14-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); assumes facts not in evidence	133:11-13
134	3 (from “Do”)- 6 9-18 and 22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	134:7-8 134:19-20
135	1-8, 11-13 and 15-17	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	135:9-10 135:14
137	21-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct.	

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		2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	
138	1-22 [Replace "Deposition Exhibit No. 14" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	
139	1-10 and 14-19	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	139:11-13
140	6-22 [Replace "Exhibit No. 15" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	
141	1-6 (through "lawyer")	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct.	

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146	13-22 [Replace "Exhibit No. 16" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	
147	1-6 and 8-16	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	147:17-22
148	7-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	
149	1-3, 5-14 and 17-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403);	149:15-16

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		assumes facts not in evidence	
150	1 10-22 [Replace “Exhibit No. 17” with Def Ex]	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); assumes facts not in evidence	
151	1-8 and 11-21	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	151:9-10 151:22 – 152:2
152	3-4 14 (from “that’s”) – 16 19-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	
153	5-6, 8-9 and 12-18	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	153:1-4 153:19 – 154:1 (to “question”)
154	1 (from “The”) – 11 13-15	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403);	

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		needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	
155	5-12 [Replace "Exhibit No. 18" with Def Ex] 15-20 [Replace "Exhibit 8" with Def Ex]	All lines: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence Lines 16-20: misstates the record	155:21-22
156	1-6 and 12-22	Misstates the record; relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	156:7-11
157	1-2, 7-14 and 16-21	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	157:3-6
158	1-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct.	

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159	3-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	
160	1-6 and 9-17	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	
161	6-22 [Replace "Deposition Exhibit 19" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	
162	1-6, 9-16 and 19-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va.	

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164	1-4 and 8-12 20-22 [Replace "Exhibit No. 20" with Def Ex]	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	164:5-7
165	1-12 and 14-21	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	
166	2-19 21-22 [Replace "Exhibit 2" with Def Ex]	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); assumes facts not in evidence	
167	5 (from "I'm") – 22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct.	

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169	2-21	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	
170	7 (from "It") – 13	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	170:14 – 171:3
171	4-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence; non-responsive	
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174	1-3, 7-12 and 15-21	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); assumes facts not in evidence	
175	1 (from "Now") – 3 and 7-14	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	175:4-6 175:15-16
176	1-2 14-15 [Replace "Deposition Exhibit 21" with Def Ex] 16 (from "And")- 22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence	
177	1-12, 14-15, 17-18 and 20	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence	177:13 177:16 177:19
178	1-3, 6 and 8-17	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence; misstates testimony	178:4-5 178:7 178:21 – 179:1

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182	4-10	Relevance (Va. R. S. Ct. 2:402)	
183	4-6 16 – 18 [Replace “Exhibit No. 23” with Def Ex] 20-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence	183:7
184	22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence	
185	1-6 and 12-13	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence	185:7-11
186	5-8, 10-13 and 17-22	All lines: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence Lines 11-13: calls for speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	186:9 186:14-16
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188	5-9	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence	

**Deposition of Elizabeth Rae Marz
November 26, 2019**

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60	12-14 and 16-23 25 (from "But")	Hearsay (Va. R. S. Ct. 2:802); Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
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62	15 (from "And") – 17		
63	9-16 18 (from "So") – 20 21 (through "yes") 22 (from second "I don't") - 25	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
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67	1-9		67:10-13, 67:20-23
68	3 (from "Would") – 7 (through first "I don't know") 23-25 [Replace "Exhibit 3" with Def Ex. 1]		
72	18 (from "Do") – 25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
73	1-11 and 15	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	73:17-23, 74:20
75	15 (from "So") – 25		
76	1-6		76:7-13
77	17-22	Vague & Ambiguous	77:10-16
79	19 (from "And") – 25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
82	2-6		
85	1 (from "At") – 25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
86	1-6 20 (from "When") – 25	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
87	1-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
88	15-19 22 (from "when") – 24	Lack of Foundation, Speculation, Lack of	

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90	1-3 and 7-25	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
91	1-2	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	91:3-6
92	11-12, 14-16 and 19-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Non-responsive	
93	24-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	93:8-19
94	1-7 and 22-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	91:3-6, 93:8-19
95	1-11 and 20-22	Improper Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
96	11-15 and 19-25	Improper Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	96:16-18
97	1-4, 10-12, 14-23 and 25	Improper Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Speculation, Lack of Personal	

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106	6-25	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
107	1-12	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
108	9-24	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
109	2, 5-6, 8-10 and 12-13 14 (from "I think she") – 22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
113	10-25	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	206:16-18
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115	4-13 and 15-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
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119	3-12 and 14-19 23 (from "So") -25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Vague & Ambiguous	206:16-18
120	1-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	206:16-18
121	1-15	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	206:16-18
122	5-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701)	
123	24 (from "And") – 25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
124	1-18 and 24-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	206:16-18
125	1-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	206:16-18
126	1-6 11 (from "When") – 24	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	206:16-18
127	4 (from "What") – 20 (through "deposition") [Referring to Def Ex (Exhibit 3)] 23-24	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
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132	1-5	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802); Needlessly Cumulative (Va. R. S. Ct. 2:403)	
133	11-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Needlessly Cumulative (Va. R. S. Ct. 2:403)	
134	4-5 9 (from "I mean") – 17	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Needlessly Cumulative (Va. R. S. Ct. 2:403)	
135	6 (from "So") – 12 14-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701); Needlessly Cumulative (Va. R. S. Ct. 2:403)	206:16-18
136	1-10 18 (from "'was'") – 25		206:16-18
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139	1-25	Hearsay (Va. R. S. Ct. 2:802);	206:16-18
140	1-25	Hearsay (Va. R. S. Ct. 2:802);	206:16-18
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142	3-19 22 (from "Did") – 25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Needlessly Cumulative (Va. R. S. Ct. 2:403)	
143	1-13 17 (from "I know") – 25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Needlessly Cumulative (Va. R. S. Ct. 2:403)	
144	1-8 and 17-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Needlessly Cumulative (Va. R. S. Ct. 2:403)	
145	2 and 6-8	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Needlessly Cumulative (Va. R. S. Ct. 2:403)	
146	15 (from "So") – 20 23 and 25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Needlessly Cumulative (Va. R. S. Ct. 2:403)	
147	1-7 and 9-14	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Needlessly Cumulative (Va. R. S. Ct. 2:403)	
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150	1-10	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
151	4-9, 11-20 and 23-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	
152	1-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	
153	1-3, 6-13 and 24-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	155:6-9
154	1-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	206:16-18
155	3 (from "You") – 5		
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157	1 3 (from "It was") – 6 12-15	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	157:12-15, 157:16-18
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160	1-5 and 7-9		
161	2-3 and 6-24	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701)	
162	1-2 and 4-5	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701)	
166	6-7, 9-17, 19-21, and 23-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
167	1-2 and 4-6 14 (from "And") – 20	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	167:21-25, 206:16-18
168	1 (from "So") – 4 5 (from "the") – 10 12-17	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
174	10-12, 14-16 and 19-23 (through "apartment")	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	176:15-21, 206:16-18
175	8-10 and 13-16	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
179	5-19 (through "this")	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	179:19 (starting at "But,") – 22, 206:16-18

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187	5-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
188	1-3, 10-11, and 14-18	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
189	10-12 and 14-19 21 (from "I") - 23	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	206:16-18
213	7-10, 12 and 14	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Vague & Ambiguous as to "charged"	
214	14-16 and 22-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
215	1-6		
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229	1-13 and 16-25		
230	1-8, 10-1 and 18 20 (from "I") - 24	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Vague & Ambiguous as to time	230:12-16
233	16-25 [Replace "Exhibit Number 9" with Def Ex - video clip]		
234	14-15, 21-22, and 24-25		
235	1-7, 15-18 and 25 ["what's been Bates	Lack of Foundation, Speculation, Lack of	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
	labeled video clip Number 42” with Def Ex - video clip 42]	Personal Knowledge (Va. R. S. Ct. 2:602)	
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237	14-23 [Replace “Video Clip 51” with Def Ex]	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	237:24-238:3
240	15-20 [Replace “Depp Exhibit 9” with Def Ex] 23-25		
241	1-5 and 12-15 20 [Replace “Exhibit 10” with Def Ex] 24-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
242	6-25 [Replace “Exhibit 10” with Def Ex]	Vague & Ambiguous as to “some of the videos”	
243	1-3 and 16-23 [Replace “Marz Exhibit 11” with Def Ex]	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
244	1-4	Vague & Ambiguous	
249	6-25	Relevance (Va. R. S. Ct. 2:402)	
250	1-6, 12-15 and 18-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402)	250:16-17
251	1 (from “and now”) – 3 9-17	Relevance (Va. R. S. Ct. 2:402)	
252	4-6		
254	1-8 and 16-22	Hearsay (Va. R. S. Ct. 2:802)	
256	5 (from “have”) – 7 10-23	Vague & Ambiguous; Leading	
260	2-14 (through “penthouses”		
261	4-24 (through “downtown”)	Vague & Ambiguous;	

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263	1-11, 20-21 and 24-25	Hearsay (Va. R. S. Ct. 2:802); Leading	263:22-23
264	1-6 and 14-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
265	1-14 and 22-24 25 (from "and that")	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802);	265:15-20
266	1-19 and 23-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802); Leading	
267	2 and 17-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	267:1
268	1-8 and 23-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
269	1 and 4-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
270	1-10 and 13-25	Improper Character Evidence (Va. R. S. Ct. 2:404)	270:11
271	1-11 and 14-25	Leading	271:12
272	1-10 and 15-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
273	1-25	Lack of Foundation, Speculation, Lack of	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
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274	1-20 [Replace "Marz Exhibit 13" with Def Ex] 24-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
275	1, 7-8 and 13-25	Vague & Ambiguous as to "marks"	
276	1-13 24 (from "The") – 25		276:18-20
277	1-20 and 24-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	277:21-22
278	1-17	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
280	6-10 23 (from second "do you recall") – 25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	280:18-20
281	1-2, 15-17 and 20-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);	
282	1-7 and 10-24	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	282:8-9
283	2-14 and 19-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
284	1-6 and 18-23	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	284:24-25
285	5 (from "My") – 21 24-25	Lack of Foundation, Speculation, Lack of	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802); Non-responsive; Needlessly Cumulative (Va. R. S. Ct. 2:403)	
286	1-4 and 11-16	286:1-4 Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802); Non-responsive; Needlessly Cumulative (Va. R. S. Ct. 2:403)	286:5-9
287	1-23	286:1-4 Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
288	5-25	286:1-4 Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
289	1-5, 15-17 and 21-25		
290	1, 9-15, 20-22 and 25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	290:17-18
291	1-15 and 22-25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	291:16-17
292	1-3, 6-17, 21-22 and 25	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	292:4-5, 292:18-19, 292:23-24

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294	2-4	Vague & Ambiguous as to "little shady"	

**Deposition of Michele Mulrooney
March 1, 2021**

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9	1-22		
10	1-22	Lines 21-22: calls for conclusion of law (Va. R. S. Ct. 2:704), expert testimony	
11	1-3, 12-13 and 22	Lines 1-3, 12-13: calls for conclusion of law (Va. R. S. Ct. 2:704), expert testimony	
12	1 and 16-19		
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14	2-20 [Replace "Exhibit No. 3" with Def Ex]		
15	7 and 9 12 (from second "I take") – 22		
16	1-9 and 21-22		
17	1-3 [Replace "Number 4" with Def Ex]		
19	15-21		
20	12-20	Calls for conclusion of law (Va. R. S. Ct. 2:704), expert testimony	
21	15-21	Calls for conclusion of law (Va. R. S. Ct. 2:704), expert testimony	
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PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
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25	2-22		
26	1-9		
28	20-21 [Replace "Exhibit Number 6" with Def Ex]		
29	3-11 and 18-22		
30	19-22 [Replace "Exhibit Number 7" with Def Ex]		
31	1-5 and 19-22		
32	1-15		
33	1-8, 14-16 and 18-22	Calls for expert testimony	33:9-12
34	1-6		
35	5-16 [Replace "Exhibit Number 8" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802)	
36	12-17		
37	9-22 [Replace "Exhibit Number 9" with Def Ex]		
39	16-22 [Replace "Exhibit Number 10" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802)	
40	1-13 20-22 [Replace "Deposition Exhibit Number 11" with Def Ex]	Lines 1-2: hearsay (Va. R. S. Ct. 2:802)	
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43	9-15		
45	21-22	Leading	
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47	10-11 and 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), hearsay (Va. R. S. Ct. 2:802)	47:12

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48	1-2 and 6-11	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), improper character evidence (Va. R. S. Ct. 2:404)	48:4, 12-13 58:17 – 59:5, 10 66:8-21 69:12-20 71:7-8, 10
49	16	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	
50	6-8, 11-12 and 14-18	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), argumentative, assumes facts not in evidence	50:9-10
51	14-16	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), argumentative	51:17-20
52	2-5, 13-20 and 22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), improper character evidence (Va. R. S. Ct. 2:404)	52:6-8
53	1-11, 14-17 and 19-21	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), improper character evidence (Va. R. S. Ct. 2:404) Lines 19-21: assumes facts not in evidence	53:12-13 53:22 – 54:1
54	2-7 and 10-22	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403)	58:17 – 59:5, 10 66:8-21 69:12-20 71:7-8, 10
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79	3-7 and 10-11	Relevance (Va. R. S. Ct. 2:402), unfair prejudice (Va. R. S. Ct. 2:403), argumentative	79:8
80	21-22		
81	1		

**Deposition of Brandon Patterson
Designated Representative of Action Property Management
March 2, 2022**

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
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13	1-6 [Replace "Exhibit 1" with Def Ex]		
14	1-3 13 (from "is it") – 19 22 (from "please") [Replace "Exhibit 2" with Def Ex]		
15	1 and 7-8 (through "testimony") 11-13 and 15-17	15:12-13: Compound.	15:14
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17	1-6 7 (from "And") – 22	17:8-10: Unintelligible; Vague & Ambiguous.	
18	1-19		
19	1-6, 11-15, 18 and 20	19:14-18: Vague & Ambiguous as to timeframe; Assumes Facts Not in Evidence.	19:16; 19:19.
20	9-13		
21	6-7, 10, 13 and 15-17	21:6-10: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence; Leading.	21:8; 21:11-12.
22	11-22	22:11-15: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602) 22:20-22: Leading; Assumes Facts Not in Evidence.	

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24	3-5 and 14-22		
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26	15-16 [Replace "Exhibit 3" with Def Ex]		
27	8		
28	21-22 (through "video")	28:21-22: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Vague & Ambiguous.	
29	12-13, 15-18 and 21-22	29:15-18: Relevance (Va. R. S. Ct. 2:402); Improper Character Evidence (Va. R. S. Ct. 2:404); Vague & Ambiguous.	29:2-3. 29:19-20.
30	1, 3-4, 7-9, 12-13 and 15-17	30:7-9: Relevance (Va. R. S. Ct. 2:402); Improper Character Evidence (Va. R. S. Ct. 2:404); Vague & Ambiguous	30:10-11.
32	20-22	32:20-22: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence; Leading	
33	3-4 and 6-9		33:1-2.
35	7-8, 11-13 and 15-22	35:7-8: Vague & Ambiguous. 35:18-20: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	35:9-10

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
36	1-5, 8-12 and 14-22	36:4-5: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence.	36:6-7.
37	1-22	37:16-17: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	
38	1-2, 7-12 and 15-19	38:11-12: Asked & Answered.	38:13-14.
39	1-11, 14-17 and 19-20	39:9-11: Assumes Facts Not in Evidence; Asked & Answered. 39:19-20: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	39:12-13. 39:21-22.
40	1, 3-8, 11, 13-20 and 22	40:6-8: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802); Assumes Facts Not in Evidence; Vague & Ambiguous. 40:13-14: Hearsay (Va. R. S. Ct. 2:802). 40:20: Hearsay (Va. R. S. Ct. 2:802).	40:9-10. 40:21.
43	20-22	43:20-22: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602);	
44	3, 12 and 14	44:12: Vague & Ambiguous.	44:1-2. 44:13.

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45	4-5 [Replace "Exhibit 4" with Def Ex]11-13, 15, 17-20 and 22	45:11-13: Argumentative. 45:17-19: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802); Leading; Assumes Facts Not in Evidence.	45:14. 45:21.
46	1, 15-17 and 20 (through "No")	46:15-17: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802); Vague & Ambiguous. 46:20: Objection to incomplete designation of witness's answer.	46:18-19. 46:20-22.
47	4-8 [Replace "Exhibit 5" with Def Ex] 11-12 and 15-16 [Replace "Exhibit 5" with Def Ex]18-22		
48	6-22	48:6-13: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	
49	8 (from "Do") – 12 15 and 19-22		

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50	1-2, 7-10, 14, 17-19 and 21-22	<p>50:1-2: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).</p> <p>50:9-10: Misstates prior testimony; Asked & Answered.</p> <p>50:14: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)</p> <p>50:21-22: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)</p>	<p>50:3-4.</p> <p>50:11-12.</p> <p>50:15-16.</p>
51	3-4 7 (from "did") – 8 12-14 15 (from "And") – 17	51:15-17: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	51:1-2. 51:18-20.
52	1-8 10-11 and 17-18 [Replace "Exhibit 6" with Def Ex] 20-22	59:5-7: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	52:9; 59:12-13.

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53	1-5, 7-8, 10-14, 17 20 [Replace "Exhibit 7" with Def Ex]	53:4-5: Vague & Ambiguous. 53:13-14: 51:15-17: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	53:6. 53:15-16.
55	9-10 [Replace "Exhibit 7" with Def Ex] 12-18 and 20-21	55:18: Vague & Ambiguous.	55:19.
56	1-5, 8-9, 11-12 and 15 17-20 [Replace "Exhibit 7" with Def Ex] 22	56:4-5: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602). 56:11-12: Compound; Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	56:6-7. 56:13-14.
57	1-2, 10-11 and 13	57:10-11: Vague & Ambiguous; Relevance (Va. R. S. Ct. 2:402); Improper Character Evidence (Va. R. S. Ct. 2:404).	57:12.
58	4 and 7-8 [Replace "Exhibit 8" with Def Ex] 11-18 and 21	58:17-18: Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	58:19-20.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
59	3-4, 7-8, 10 and 13-14	<p>59:3-4: Vague & Ambiguous; Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Improper Character Evidence (Va. R. S. Ct. 2:404).</p> <p>59:10: Vague & Ambiguous; Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Improper Character Evidence (Va. R. S. Ct. 2:404)</p>	<p>59:5-6.</p> <p>59:11-12.</p>
60	9-11 20 [Replace "Exhibit 10" with Def Ex]		
61	1-2 [Replace "Exhibit 10" with Def Ex] 4-16, 19 and 21-22	61:15-16: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	61:17-18.
62	1, 5-8, 11, 13-14, 17, 19 and 21-22	<p>62:8: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402).</p> <p>62:13-14: Vague & Ambiguous; Relevance (Va. R. S. Ct. 2:402).</p> <p>62:19: Relevance (Va. R. S. Ct. 2:402); Leading.</p>	<p>62:9-10.</p> <p>62:15-16.</p> <p>62:20.</p>

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63	16 and 19-20 [Replace "Exhibit 11" with Def Ex] 22		
64	1-11 and 13	64:10-11: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	64:12-15.
65	4-7 and 11-12	65:6-7: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402)	65:9-10.
66	4-7 10 and 13-14 [Replace "Exhibit 12" with Def Ex] 16-22		
67	9-10, 13, 17 and 20	67:9-10: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602). 67:17: Vague & Ambiguous; Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	67:11-12. 67:18-19.
68	1 and 4-5 [Replace "Exhibit 13" with Def Ex] 7-17 and 20	68:16-17: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	68:18-19.

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69	3-5 8 and 11-12 [Replace "Exhibit 14" with Def Ex] 14-22		
70	1-5, 8 and 21-22	70:4-5: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	70:6-7.
71	1-2, 9-12 and 15	71:11-12: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	71:13-14.
72	10 (from "move") and 13-14 [Replace "Exhibit 16" with Def Ex] 16-22		
73	1-5, 8, 12-14 and 16-22	73:4-5: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	73:6-7.
74	1 7 and 10-11 [Replace "Exhibit 17" with Def Ex] 13-18 and 21	74:17-18: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	74:19-20.
75	1-2 and 5 8 and 14-15 [Replace "Exhibit 18" with Def Ex] 18 (from "do") – 22	75:1-2: Vague & Ambiguous.	75:3-4.

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76	1-3 and 6 8 (from "please") and 11-12 [Replace "Exhibit 19" with Def Ex] 14-16, 19-20 and 22	76:2-3: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602) 76:14-16: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	76:4-5. 76:17-18.
77	1-13 and 17 19 (from "please") and 22 [Replace "Exhibit 20" with Def Ex]	77:11-13: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Compound.	77:14-16.
78	1, 3-11 and 17-20	78:10-11: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	78:12-14.
79	1 and 4-5 [Replace "Exhibit 21" with Def Ex 7-19 and 22	79:18-19: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	79:20-21.

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80	3 and 6-7 [Replace "Exhibit 22" with Def Ex] 9-21	80:19-20: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	80:22.
81	3-5 14 (from "Does") – 17 22 [Replace "Exhibit 23" with Def Ex]		81:1.
82	4-5 [Replace "Exhibit 23" with Def Ex] 7 (from "do") – 15, 19 and 21-22	82:14-15: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602) 82:21-22: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	82:16-18.
83	1 3 (from "move") and 6-7 [Replace "Exhibit 24" with Def Ex] 9-16 and 19	83:15-16: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	83:17-18.
84	15 and 18-19 [Replace "Exhibit 27" with Def Ex]		
85	8-13 and 16 18 (from "move") and 21-22 [Replace "Exhibit 28" with Def Ex]	85:12-13: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	85:14-15.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
86	2-12, 15 and 17-19	86:11-12: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	86:13-14.
87	3 (from "move") and 6-7 [Replace "Exhibit 29" with Def Ex] 9-16, 19 and 21-22	87:15-16: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	87:17-18.
88	1 3 (from "move") – 4, and 7-8 [Replace "Exhibit 30" with Def Ex] 10-20	88:19-20: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	88:21-22.
89	1		
90	10-11 [Replace "Exhibit 30" with Def Ex] 13-22		
91	1-5 (through "Yes")		
92	11 and 12 ("Exhibit" and "31" only) [Replace "Exhibit 31" with Def Ex] 15-16 [Replace "Exhibit 31" with Def Ex] 18-22		
93	1-4 and 7 12 (from "While") – 21	93:3-4: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	93:5-6.

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94	1, 14-15, 18-19 and 21-22	94:14-15: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	94:16-17.
95	1-5, 8 and 19-20	95:3-5: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602) 95:19-20: Vague & Ambiguous.	95:6-7. 95:21-22.
96	1, 3-4 and 7 9 (from "move") and 12-13 [Replace "Exhibit 32" with Def Ex] 15-22	96:3-4: Vague & Ambiguous; Argumentative; Leading.	96:5-6.
97	1-5 and 8 16-17 and 20-21 [Replace "Exhibit 33" with Def Ex]	97:4-5: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	97:6-7.
98	1-9 and 15-22	98:7-8: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	
99	1-3 and 5-8 9 (from "where") – 11 15 (from "Where") – 20		
100	1	Unintelligible designation.	

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101	7 and 10-11 [Replace "Exhibit 34" with Def Ex] 13-21	101:20-21: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	101:22.
102	2, 4-6, 8, 10-11, 14-16, 18-19 and 22	102:6: Vague & Ambiguous. 102:18-19: Vague & Ambiguous; Leading; Argumentative.	102:1. 102:7. 102:20-21.
103	2-3 and 5 8 and 11-12 [Replace "Exhibit 35" with Def Ex] 14-22	103:2-3: Vague & Ambiguous; Leading; Argumentative. 103:21-22: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	103:4.
104	3, 6-7 and 9-11 (through "Amber")		104:1-2.
105	3-4 and 7-8 9-10 and 13-14 [Replace "Exhibit 36" with Def Ex] 16-18 and 20-22	105:3-4: Vague & Ambiguous; Leading; Argumentative.	105:5-6.
106	1-4, 7, 14-15 and 18-20 [Replace "Exhibit 37" with Def Ex]	106:3-4: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602) 106:14-15: Vague & Ambiguous; Leading; Argumentative.	106:5-6. 106:16-17.

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107	1-2 [Replace "Exhibit 37" with Def Ex] 4-12, 15 and 20-22	107:11-12: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	107:13-14.
108	2 (from "please") and 5-6 [Replace "Exhibit 38" with Def Ex] 8-16 and 19 21 (from "and if") -22	108:15-16: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	108:17-18.
109	2-5 7 (from "we") and 10-11 [Replace "Exhibit 39" with Def Ex] 13-14, 18 and 22	109:13-14: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	109:15-17.
110	1-11 and 16-20		
111	9 (from "Can") -10 and 13-14 [Replace "Exhibit 40" with Def Ex] 16-22		
112	1-2 and 5 7 (from "and") -8 10-11, 13, 15-18 and 21-22	112:1-2: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602) 112:17-18: Vague & Ambiguous; Leading; Argumentative; Compound.	112:3-4. 112:19-20.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
113	2-3, 6 and 8-10 12 (from "move") – 13 and 16-17 [Replace "Exhibit 41" with Def Ex] 19-22	113:2-3: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	113:4-5.
114	1-6, 9, 11-12, 15 and 17- 21	114:4-6: Argumentative; Vague & Ambiguous; Leading 114:11-12: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	114:7-8. 114:13-14.
115	1 (from "move") and 6-7 [Replace "Exhibit 42" with Def Ex] 9-16 and 19-21	115:15-16: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	115:17-18.
116	4-9 and 12 15 (from "move") and 18-19 [Replace "Exhibit 43" with Def Ex] 21-22	116:8-9: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	116:10-11.
117	1-7, 10 and 14-17 18-19 and 22 [Replace "Exhibit 44" with Def Ex]	117:6-7: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	117:8-9.
118	1, 3-10, 13, 15-20 and 22		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
119	1-6, 9-10 and 12-14	119:5-6: Argumentative; Vague & Ambiguous; Leading.	119:7-8.
120	17 and 20-21 [Replace "Exhibit 46" with Def Ex]	120:17-21: Unintelligible designations.	
121	8-15 and 18 21-22 [Replace "Exhibit 45" with Def Ex]	121:21-22: Unintelligible designation; Argumentative; Vague & Ambiguous; Impermissible Expert Opinion (Va. R. S. Ct. 2:701); Leading.	
122	2-11, 14 and 18-21	122:20-21: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	
122	3-6 and 9-10 [Replace "Exhibit 47" with Def Ex] 12-19 and 22		
123	9-11 and 16-21	123:9-10: Vague & Ambiguous; Leading; Argumentative 123:19-20: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	123:12-14.
124	910 and 22 [Replace "Exhibit 48" with Def Ex]	124:9-10: Unintelligible designation.	

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125	1-9, 12 and 14-20	125:8-9: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602) 125:19-20: Vague & Ambiguous; Argumentative; Leading.	125:10-11 125:21-22
126	1 and 8-11		
127	2-3 [Replace "Exhibit 49" with Def Ex] 10-15 [Replace "Exhibit 49" with Def Ex] 17-21		
128	9-11 and 13-15 17 (from "please") and 20-22 [Replace "Exhibit 50" with Def Ex]		
129	1 (through "please") 4-6 8 (from "Does") – 15 20-22		
130	1-15, 19-20 and 22	130:13-15: Vague & Ambiguous; Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence.	130:16-18.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
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132	1, 4, 6-13, 17-18 and 20-21	<p>132:10-13: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)</p> <p>132:20-21: Vague & Ambiguous; Impermissible Opinion (Va. R. S. Ct. 2:701); Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)</p>	<p>132:2-3.</p> <p>132:14-16</p> <p>132:22</p>

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
133	1-2, 4-5, 9, 11-13, 16 and 18-21	133:4-5: Vague & Ambiguous; Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Compound; Leading; Argumentative 133:11-13: Leading; Argumentative. 133:18-21: Leading; Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Incomplete Hypothetical.	133:6-8. 133:14-15. 133:22.
134	2-4, 17-19 and 22	134:17-19: Compound; Asked & Answered.	134:1 134:20-21.
135	1-3, 5-12 and 15-20 [Replace "Exhibit 3" with Def Ex]	135:9-11: Vague & Ambiguous.	135: 13-14.
136	7-11, 15-17 and 20-22	136:7-10: Misstates prior testimony. 136:15-17: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	136:12-13. 136:18-19.
137	2-4, 7-9, 11-14 and 17-18	137:2-4: Vague & Ambiguous; Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602) 137:11-14: Vague & Ambiguous; Mistates Prior Testimony; Leading.	137:5-6. 137:15-16
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290	1, 3-10, 13, 15-16, 18, 20-21 and 23-25 [Referring to Exhibit 41; Replace with Def Ex]	290:1-13: Hearsay (Va. R. S. Ct. 2:802); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602) 290:15-23: Leading; Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	290:2, 290:11-12, 147:17- 19, 150:14-151:11, 151:18-25 290:17, 290:22
291	8-21		
292	5 [Replace "42" with Def Ex] 7-14 and 17-19 [Referring to Exhibit 43; Replace with Def Ex]	292:7-10: Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:702) 292:11-17: Vague & Ambiguous; Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	147:17-19, 150:14-151:11, 151:18-25 292:15-16, 147:17-19, 150:14-151:11, 151:18-25
293	2-5, 8-9, 11-12, 14-17, 21-23 and 25	Leading; Vague & Ambiguous; Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	147:17-19, 150:14-151:11, 151:18-25, 293:6, 293:10, 293:18-19, 293:24
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296	4-8, 10, 12-15, 18, 20-21 and 23-24	296:12-21: Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602) 296:23-25: Leading	296:16, 296:19, 147:17-19, 150:14-151:11, 151:18-25 296:25, 297:4
297	2-3 and 5 21 (from "do") – 22 24	297:2-5: Leading; Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802) 297:21-25: Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	296:25, 297:4 297:23
298	2, 5-8 and 25	298:2-8: Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	298:2-8

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300	2, 13-16, 18 and 20-25	300:13-18: Leading; Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	300:17
301	1-4, 7, 9-15, 17 and 19-25	301:2-7: Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802); Improper	301:5-6

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303	6-25 [Referring to Exhibit 44; Replace with Def Ex]	<p>303:6-8: Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802); Improper Opinion (Va. R. S. Ct. 2:702)</p> <p>303:16-20: Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802); Improper Opinion (Va. R. S. Ct. 2:702)</p>	147:17-19, 150:14-151:11, 151:18-25
304	1-3, 5, 7-9, 11, 13-21 and 25	<p>304:1-5: Leading; Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)</p> <p>304:7-11: Leading; Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)</p> <p>304:13-19: Relevance (Va. R. S. Ct. 2:402); Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602);</p>	304:4 304:10

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311	2-4 and 6 [Referring to Exhibit 1; Replace with Def Ex] 10-11, 13-15 and 17-25	Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	31:5, 311:12, 81:8-11, 82:8-11; 82:12-15
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313	2, 4, 6-12, 14-16 and 23-25	313:1-2: Incomplete/ Unintelligible; Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802) 313:4-12: Leading; Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	312:25-313:1, 81:8-11, 82:8-11; 82:12-15 313:5, 313:17-18, 81:8-11, 82:8-11; 82:12-15
314	1-13 and 15-17	314:9-17: Compound; Leading	
315	3-21	Relevance (Va. R. S. Ct. 2:402)	

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

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27	15 (from "what led") - 22	Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
28	1-2, 5-7 and 15-22	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	28:8-9
29	1-4 and 11-12		29:13-18
31	3-16		
33	11 (from "so after") - 21 (through "letter")		
34	19 (from "since") - 21		
35	2 (from "no") - 6 7 (from "the event") - 10 15 (from "So") - 20 21 (from "what are") - 22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
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38	9-10 [Replace "Exhibit 3" with Def Ex 1023]		
39	6-8 [Replace "Exhibit 3" with Def Ex 1023] 9 (from "I'm") - 10 11 (from "on") - 17 19-21		
42	18-19	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation,	42:20-22

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44	3 (from "it's") – 4 12 (from "you") – 15 17 (from "what") – 19 21 (from "I") -22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
45	1 (through "there")		
46	7-9 and 13	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	46:10-11
51	19-20	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	51:21-22
52	1 2 (from "you") – 5 (through "Yes") 8-11 14 (from "So") – 21 22 (from "I")	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	45:9-11
53	1-5	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	53:6-10
54	3-5 12 (from "I") – 13	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	53:19-54:2, 54:6-8
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56	6-17	Relevance (Va. R. S. Ct.	56:18-57:5

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58	21-22	Relevance (Va. R. S. Ct. 2:402)	
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62	1-5 and 8-17	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	62:6-7, 62:18-20
63	4 (from "who") – 5 8 21 (through "guards") 22 (from "I felt")	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	63:6-7, 65:15-20
64	1 and 6-10	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	65:15-20
65	3-7	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	53:6-18, 65:10-12, 65:15-20
66	20-22	Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	53:6-18, 45:9-11
67	7 (from "you recall") – 10 [Replace "Exhibit 2" with Def Ex 877]	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	19:15-21
68	1-8 (through "him") 9-10 (through "4") [Replace "Exhibit 4" with Def Ex 156]	Relevance (Va. R. S. Ct. 2:402)	
69	6 (from "Does") – 8 11 (from "If") 12 (through "so")	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation,	69:9-10, 69:12 (starting with "But")

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75	2 (through “pages”) [Replace “Exhibit 6” with Def Ex 21] 18 (from “Are”) – 21 (through “Yes”)	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
84	10-13	Vague & Ambiguous as to “contentious”	

**Deposition of Anthony Romero
Designated Representative – American Civil Liberties Union
December 15, 2021**

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245	4-5 and 8-12	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	
324	7-9 and 12-16	Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701)	324:10-11

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356	12-16 20 (from "Were") – 21	356:20: Leading	356:22
357	1-3 and 7-8	357:1: Leading 357:2-8: Leading; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	356:22 357:4-6
358	1-3 and 5	Leading; Vague & Ambiguous	358:4
360	1 (from "Mr.") – 7 and 10-16	Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	360:8-9, 360:17-361:2
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Designated Representative – Los Angeles Police Department
March 12, 2021**

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8	5-22	Objection. Relevance. Va. R. S. Ct. 2:402.	
9	1-2 and 17-22 [Replace "Exhibit Number 1" with Def Ex]	Objection. Relevance. Va. R. S. Ct. 2:402.	
10	1-10	Objection. Relevance. Va. R. S. Ct. 2:402.	
12	3-6	Objection. Relevance. Va. R. S. Ct. 2:402.	12:7-8
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19	2 and 4-16	As to all questions: Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	19:3 19:17-21
20	1-6, 10-18 and 21-22	As to all questions: Objection. Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay	20:7-8 20:19-20

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23	6-9 and 12-21	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	23:10-11
24	9-11 and 14-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Lacks Foundation. Va. R. S. Ct. 2:602.	24:12
25	1-5 and 7-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	
26	1-5 and 16-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	26:6-15
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29	1-5, 11-17 and 19-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	29:6-10 130:12-1 123:14-126:13 147:9-148:15 134:19-135:17 137:21-138:16 146:22-147:7
30	4-10, 12-17 and 21-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	30:1-3 30:18-19
31	1-10, 12-14 and 20-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	31:15-19
32	1-5, 16 and 18-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	32:17
33	1, 3-6 and 14-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	33:7-12

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35	1-3 and 10-13	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	35:4-8
36	3-7 and 12-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	36:8-11
37	1-2, 4-7 and 11-15	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	37:8-10
38	10-16	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	38:17-2
39	3 (from "Each") – 17 and 19-22	Incomplete – omits portion of response. Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	40:2-3 40:17-22
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43	1-5, 7-13 and 17-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	43:14-16
44	1 and 3-6 12 ("domestic violence" only) 19-21	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	44:13-18
45	1-4 and 19-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	
46	1-10, 13-16 and 18-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical.	46:11-12 47:1-4

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50	5-17 and 22	Relevance. Va. R. S. Ct. 2:402. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	50:18-21
51	1-3 and 7-19	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602. 7:19: Objection to narrative by counsel.	51:20-21
55	19 (from "Now") – 22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	130:12-1 123:14-126:13 147:9-148:15 134:19-135:17 137:21-138:16 146:22-147:7
56	1-5 and 12-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	56:6-9
57	2-11	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	
58	17-20	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical.	

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62	4-22 [Replace "Deposition Exhibit 8" with Def Ex]	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	
63	1-10	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	
65	3-9, 14 and 16-20	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	64:10-13 65:12-66:2 130:12-1 123:14-126:13 147:9-148:15 134:19-135:17 137:21-138:16 146:22-147:7
66	3-11 and 17-21 [Replace "Deposition Exhibit 9" with Def Ex]	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	
67	10 (from "is this") – 21 [Replace "Deposition Exhibit 8" with Def Ex]	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	

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69	1-5 and 13-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	69:6-10 147:9-148:15
70	1-2, 4-9 and 14-22	Relevance. Va. R. S. Ct. 2:402. Lacks Foundation. Va. R. S. Ct. 2:602.	70:11-12 147:9-148:15
71	1-3, 6, 8-16 and 20-22	Relevance. Va. R. S. Ct. 2:402.	71:17-19 147:9-148:15 118:18-120:3 120:7-21 130:12-1
72	1-4	Relevance. Va. R. S. Ct. 2:402.	
76	13 (from “The”) – 21	Relevance. Va. R. S. Ct. 2:402.	137:21-138:16 123:14-126:13
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79	1-4, 6-10 and 19-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	79:11-17 118:18-120:3 120:7-21 130:12-1 123:14-126:13
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82	3-7 [Replace "Deposition Exhibit 9" with Def Ex] 15-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	82:8-9 147:9-148:15
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86	1-22	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	
87	1-12	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	

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97	3-8 [Replace "Deposition Exhibit 26" with Def Ex]	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602.	97:9-18 181:12-182:4
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164	1, 3-5 and 13-16	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Incomplete/unintelligible.	
165	12-15 and 17-21	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Lack of Authentication. Va. R. S. Ct. 2:901. Beyond the scope of the deposition.	165:22

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167	1-12 and 14-20	Relevance. Va. R. S. Ct. 2:402. Improper Opinion of a Lay Witness. Va. R. S. Ct. 2:701. Improper Incomplete Hypothetical. Lacks Foundation. Va. R. S. Ct. 2:602. Assumes facts not in evidence. Lack of Authentication. Va. R. S. Ct. 2:901.	167:21-168:5
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38	1-22	<p>Lines 1-13: hearsay (2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); lacks personal knowledge (2:403); improper opinion, assumes facts not in evidence</p>	
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57	16-18 [Replace "Defendant's Exhibit 2" with Def Tr Ex]		
58	1-22		
59	1-8 and 15-22	Lines 15-20: hearsay (R. 2:802); unfair prejudice (2:403); lacks personal knowledge / speculation (R. 2:602); assumes facts not in evidence	73:1-2, 4 73:22 – 74:10 78:9-14 79:6-7, 10-12, 14 80:13-16, 19-20 81:1-7 82:2-4 82:20-22 97:7-12
60	1-4 and 8-22	Lines 8-22: hearsay (R. 2:802); unfair prejudice (2:403); lacks personal knowledge / speculation (R. 2:602); assumes facts not in evidence	73:1-2, 4 73:22 – 74:10 78:9-14 79:6-7, 10-12, 14 80:13-16, 19-20 81:1-7 82:2-4 82:20-22 97:7-12

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61	1-8, 11-17 and 20-21	<p>Lines 1-4: hearsay (R. 2:802); unfair prejudice (2:403); lacks personal knowledge / speculation (R. 2:602); assumes facts not in evidence</p> <p>Lines 5-8, 11-17, 20-21: lacks foundation / personal knowledge, speculation (R. 2:602); unfair prejudice (R. 2:403); improper opinion; assumes facts not in evidence</p>	<p>61:9-10, 18-19 73:1-2, 4 73:22 – 74:10 78:9-14 79:6-7, 10-12, 14 80:13-16, 19-20 81:1-7 82:2-4 82:20-22 97:7-12</p>
62	5 (from “Do”) – 7 12-15 and 18-22	<p>Lacks foundation / personal knowledge, speculation (R. 2:602); unfair prejudice (R. 2:403); improper opinion; assumes facts not in evidence; argumentative, leading; hearsay (R. 2:802)</p>	<p>62:8-11, 16-17 73:1-2, 4 97:7-12</p>
63	4-7, 10-12, 15-19 and 22	<p>Lines 4:7: hearsay (R. 2:802); lacks foundation / personal knowledge, speculation (R. 2:602); unfair prejudice (R. 2:403); improper opinion; assumes facts not in evidence; leading</p> <p>Lines 10-12, 15-19, 22: lacks foundation / personal knowledge, speculation (R. 2:602); unfair prejudice (R. 2:403); improper opinion; assumes facts not in evidence, hearsay (R. 2:802)</p>	<p>63:1-3, 8-9, 13-14, 20-21</p>

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
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73	11 (from "So") – 12 [Replace "Ms. Heard's Exhibit 2" with Def Ex]		
75	6-22	Lines 6-11: hearsay (R. 2:802), unfair prejudice (2:403), needlessly cumulative (R.2:403); lacks personal knowledge / speculation (R. 2:602), assumes facts not in evidence	
76	1-14 and 16-22		
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78	15-20	Lacks personal knowledge / speculation (R. 2:602); unfair prejudice (2:403); needlessly cumulative (R. 2:403); assumes facts not in evidence	61:9-10, 18-19 73:1-2, 4 73:22 – 74:10 78:9-14 79:6-7, 10-12, 14 80:13-16, 19-20 81:1-7 82:2-4 82:20-22 97:7-12

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80	1-5 and 8-12	Lacks personal knowledge / speculation (R. 2:602), unfair prejudice (2:403), assumes facts not in evidence, improper hypothetical	<p>80:6-7 80:13-16, 19-20 81:1-7 97:7-12</p>
81	5-22	<p>Lines 8-14: hearsay (R. 2:802); lacks personal knowledge / speculation (R. 2:602); unfair prejudice (2:403); needlessly cumulative (R. 2:403); assumes facts not in evidence</p> <p>Lines 15-22: lacks personal knowledge / speculation (R. 2:602); unfair prejudice (2:403); needlessly cumulative (R. 2:403); assumes facts not in evidence</p>	<p>82:2-4 97:7-12</p>
82	1	Lacks personal knowledge / speculation (R. 2:602); unfair prejudice (2:403); needlessly cumulative (R. 2:403); assumes facts not in evidence	<p>82:2-4 97:7-12</p>

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
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88	1-5, 9-10 and 13-20	Lines 1-5: hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); needlessly cumulative (R. 2:403); improper character evidence (R. 2:404); assumes facts not in evidence Lines 9-10, 13-20: relevance (R. 2:402)	
93	10-22		
94	1-2		
95	15-19	Relevance (R. 2:402)	
97	19-22		
98	1-21	All lines: relevance (R. 2:402) Lines 12-16: lacks personal knowledge / speculation (R. 2:602)	
99	1-2	Incomplete designation that starts in the middle of a question	

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10	2 and 17-21		
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21	6 (from "would") – 15 (through "Yes")		21:15 (at "as") -21:4
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40	2 (from "I") – 4 6 (from "I") – 9 (through "so")		40:9 ("I") - 10
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43	2-3, 7-10 and 16-25	43:9-25: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	43:4-6
44	2-3, 14-15 and 19-25	44:2-3: Relevance (Va. R. S. Ct. 2:402); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602) 44:14-25: Relevance (Va. R. S. Ct. 2:402)	44:14-18
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46	2-9 and 15-25	46:2-6: Hearsay (Va. R. S. Ct. 2:802) 46:7-25: Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802)	

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49	3-5 and 15-25	49:3-8, 15-25: Vague & Ambiguous as to time; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802); Improper Opinion (Va. R. S. Ct. 2:701)	49:6-8
50	2 4 (from "Based") – 7 13-25	50:2: Vague & Ambiguous as to time; Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802); Improper Opinion (Va. R. S. Ct. 2:701) 50:4-11, 13-21: Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602) 50:22-25: Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)	51:2-4

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52	7-19	<p>52:2-17: Vague & Ambiguous; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Character Evidence (Va. R. S. Ct. 2:404)</p> <p>52:18-19: Leading; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Character Evidence (Va. R. S. Ct. 2:404)</p>	<p>52:2-5</p> <p>52:20-24</p>
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55	2, 8-19 and 25	55:2-18: Leading; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal	55:3-6

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56	2-4, 9-15 and 19-25	<p>56:2-12: Leading; Vague & Ambiguous; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602)</p> <p>56:13-25: Vague & Ambiguous; Relevance (Va. R. S. Ct. 2:402)</p>	56:5-7
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		<p>Knowledge (Va. R. S. Ct. 2:602)</p> <p>61:9-11: Vague & Ambiguous as to time and "Ms. Heard was late or canceled sessions with you;" Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701)</p>	61:12-15, 62:7-9
62	2-6 21 (from "Did") – 24	<p>62:2-6: Vague & Ambiguous as to time and "Ms. Heard was late or canceled sessions with you;" Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701)</p> <p>62:21-24: Vague & Ambiguous as to time; Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Lack of Foundation, Speculation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602); Improper Opinion (Va. R. S. Ct. 2:701)</p>	61:12-15, 62:7-9 62:25-63:2, 63:13-15
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68	2-15	<p>68:2-11: Vague & Ambiguous as to time and "her behavior changing;" Hearsay (Va. R. S. Ct. 2:802)</p> <p>68:12-15: Leading</p>	67:15-19 68:16
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January 6, 2022**

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February 15, 2022**

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39	8-22 [Replace “Exhibit No. 3” with Def Ex]	8-20: jury confusion (Va. R. S. Ct. 2:403); relevance (Va. R. S. Ct. 2:402) 21-22: relevance (Va. R. S. Ct. 2:402)	
40	1-9 and 11-18	1-6: relevance (Va. R. S. Ct. 2:402)	40:10

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		7-9, 11-18: relevance (Va. R. S. Ct. 2:402); assumes facts not in evidence	
41	8-13	Relevance (Va. R. S. Ct. 2:402)	
42	5-20	Relevance (Va. R. S. Ct. 2:402)	
43	5-22	Jury confusion (Va. R. S. Ct. 2:403); relevance (Va. R. S. Ct. 2:402)	
44	1, 3-11 and 14-20	1, 3-10: jury confusion (Va. R. S. Ct. 2:403); relevance (Va. R. S. Ct. 2:402) 11, 14-18: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402) 19-20: jury confusion (Va. R. S. Ct. 2:403); relevance (Va. R. S. Ct. 2:402)	44:21 – 45:2
45	3 (from "T") – 13 18-22	Jury confusion (Va. R. S. Ct. 2:403); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
46	5-8 and 10-15	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	46:9, 16
47	5-6, 8-9 and 11-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
48	1-4, 6-8 and 10-14	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
51	13-22	Jury confusion (Va. R. S. Ct. 2:403); relevance (Va. R. S. Ct. 2:402)	
52	3-8 and 22	Jury confusion (Va. R. S. Ct. 2:403); relevance (Va. R. S. Ct. 2:402)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
53	1-22	Jury confusion (Va. R. S. Ct. 2:403); relevance (Va. R. S. Ct. 2:402)	
54	1-19	1-8: Jury confusion (Va. R. S. Ct. 2:403); relevance (Va. R. S. Ct. 2:402) 9-19: relevance (Va. R. S. Ct. 2:402)	
55	2-3, 5-16 and 19-22	Relevance (Va. R. S. Ct. 2:402) 15-16, 19-22: unfair prejudice (Va. R. S. Ct. 2:403)	55:17-18
56	1-15	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
57	8-22	Jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2:403)	
58	1-5 and 7-22	Jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2:403)	
59	2-22	Jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2:403)	
60	1, 3-5 and 11-16 (through "answer")	Jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2:403)	
61	1-2 and 13-20 [Replace "Exhibit No. 4" with Def Ex]	1-2: Jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2:403)	
63	17-18		
64	4-22	18-22: Jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2:403)	
65	1, 3-10 and 12-22	Jury confusion (Va. R. S. Ct. 2:403); unfair	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		prejudice (Va. R. S. Ct. 2:403)	
66	1-7 and 9-22	Jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2:403)	
67	1-22	Jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2:403)	
68	1-4 and 7 [Replace "Exhibit No. 5" with Def Ex] 15-20	1-4: Jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2:403)	
69	12-20 and 22	Relevance (Va. R. S. Ct. 2:402); jury confusion (Va. R. S. Ct. 2:403)	
70	1-5, 8-15 and 17-22		
71	1-9 and 11-22	12-22: Jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2:403)	
72	1-2 and 4-22	Jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2:403)	
73	1-22	Jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2:403)	
74	10-15 [Replace "Exhibit No. 6" with Def Ex]		
75	16-22 [Replace "Exhibit No. 6" with Def Ex]		
76	1-3		
77	4-9 and 15-22		
78	1-2, 4-11 and 14-22	16-22: Jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2:403)	
79	1-22	Jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2:403)	
80	1-20	Jury confusion (Va. R. S. Ct. 2:403); unfair	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		prejudice (Va. R. S. Ct. 2:403)	
81	8-20 [Replace "Deposition Exhibit No. 7" with Def Ex]	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403)	
82	19-22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
83	1-22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
84	1-22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
85	2-22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
86	1-15 [Replace "Exhibit No. 8" with Def Ex] 22	1-13 : Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
87	1-13 [Replace "Waldman Exhibit No. 8" with Def Ex] 17-22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
88	1-22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
89	1-22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
90	2-17 [Replace "No. 9" with Def Ex]	1-15: Relevance (Va. R. S. Ct. 2:403); jury	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
91	3-11 [Replace "Deposition Exhibit No. 9" with Def Ex] 15-22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
92	1-3, 9-11 and 19-22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
93	22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
94	1-22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
95	1-22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
96	1-12	1-10: Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
97	2-18 and 22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
98	1-22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
99	1-22	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403);	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		unfair prejudice (Va. R. S. Ct. 2 :403)	
100	2-19	Relevance (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403)	
101	15-18 [Replace "Deposition Exhibit No. 11" with Def Ex] 22		
102	1-7 [Replace "Exhibit No. 11" with Def Ex] 20-22		
103	1-22	6-22 : Relevance (Va. R. S. Ct. 2:403) 17-22 : Jury confusion (Va. R. S. Ct. 2 :403)	
104	1-22	1-5: relevance (Va. R. S. Ct. 2:402); jury confusion (Va. R. S. Ct. 2:403) 6-22: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
105	1-15 and 17-22	1-4: relevance (Va. R. S. Ct. 2:402); jury confusion (Va. R. S. Ct. 2:403) 5-14: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403) 20-22: relevance (Va. R. S. Ct. 2:402); jury confusion (Va. R. S. Ct. 2:403)	105:16
106	1-22	Relevance (Va. R. S. Ct. 2:402); jury confusion (Va. R. S. Ct. 2:403)	
107	1-19	Relevance (Va. R. S. Ct. 2:402); jury confusion	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		(Va. R. S. Ct. 2:403); speculation (Va. R. S. Ct. 2:602)	
122	16 (from "What") – 22	Relevance (Va. R. S. Ct. 2:402)	
123	2	Relevance (Va. R. S. Ct. 2:402)	
133	8-22		
134	1-22	Relevance (Va. R. S. Ct. 2:402)	
135	1-22	Relevance (Va. R. S. Ct. 2:402)	
136	1-12	Relevance (Va. R. S. Ct. 2:402)	
159	7 (from "Can") – 8		
160	2-3 [Replace "Exhibit 15" with Def Ex] 6-19 and 21-22		
161	1-2		
164	4-5 and 12-13 [Replace "Exhibit "16 with Def Ex] 15-22		
165	1-3 (through "no")		165:3 (from "He") - 5
169	21-22		
170	7-13 [Replace "Exhibit 18" with Def Ex] 15-19 (through "thing")		170:19 (from "And") – 171:2
171	3-4 and 7-22	Relevance (Va. R. S. Ct. 2:402) 3-4: argumentative, speculation (Va. R. S. Ct. 2:602) 9-22: jury confusion (Va. R. S. Ct. 2:403)	171:5-6
172	1-17 and 20-21	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403) 16-17, 20-21: calls for speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	172:18-19
173	9-19	Relevance (Va. R. S. Ct. 2:402)	

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174	4-5 [Replace "Exhibit 19" with Def Ex] 7-21	Relevance (Va. R. S. Ct. 2:402)	
180	15-16 and 19-22	Relevance (Va. R. S. Ct. 2:402); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403) ; assumes facts not in evidence	180 :17-18
181	3-6	Relevance (Va. R. S. Ct. 2:402); jury confusion (Va. R. S. Ct. 2:403); unfair prejudice (Va. R. S. Ct. 2 :403) ; assumes facts not in evidence	
215	12-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
216	1-9 and 15-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403)	
217	1-8	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403)	
218	5-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403)	
219	1 and 11-12	1: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403)	
220	1-2 [Replace "Exhibit 24" with Def Ex] 19-22	19-22: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403)	
221	1-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		13-22: hearsay (Va. R. S. Ct. 2:802)	
222	1-20	1-17: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); hearsay (Va. R. S. Ct. 2:802) 18-20: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); argumentative; calls for legal conclusion	222:21-22
223	1-6, 8-10 and 14-22	1-6, 8-10, 14: relevance (Va. R. S. Ct. 2:402); calls for legal conclusion Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403); hearsay (Va. R. S. Ct. 2:802)	223:11-13
224	1-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403) 1-3: hearsay (Va. R. S. Ct. 2:802) 15-22: speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); hearsay (Va. R. S. Ct. 2:802)	
225	1-8 and 10-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403)	225:9

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		8: counsel is testifying	
226	1-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403) 1-16: hearsay (Va. R. S. Ct. 2:802)	
227	1-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403)	
228	1	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403)	
230	5-11	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403)	
231	1-6	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); jury confusion (Va. R. S. Ct. 2:403)	

Deposition of Tina Newman
Designated Representative – Walt Disney Studios
February 11, 2022

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
8	19-22		
9	1-7		
10	5-12		
12	12-14 [Replace “Exhibit 1” with Def Ex]17 and 20-22		
13	1-5		
25	14-16 [Replace “Exhibit 59, Deposition Exhibit No. 50” with Def Ex]		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
26	1-22		
27	1-7		
28	11-19 [Replace "Deposition No. 1" with Def Ex]		
29	10 (from "T'm") – 12 15-22	Relevance. (Va. R. S. Ct. 2:402.) Speculation, Foundation. (Va. R. S. Ct. 2:602.) Assumes facts not in evidence.	14:6-15:14 15:21-20:22 22:5-23:22
30	1-14 and 19-22	Relevance. (Va. R. S. Ct. 2:402.) Speculation, Foundation. (Va. R. S. Ct. 2:602.) Assumes facts not in evidence.	14:6-15:14 15:21-20:22 22:5-23:22 30:15-18
31	1-2 and 18-22 [Replace "Exhibit No. 2" with Def Ex]	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]	14:6-15:14 15:21-20:22 22:5-23:22
32	1-3	Assumes facts not in evidence. Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802) The witness designated by Disney lacked knowledge of the deposition topics and	32:4-5 32:11-33:8 34:12-22 34:12-36:2

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		MS. Heard did not move to compel a further deposition.	
33	9-22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]	34:12-22 34:12-37:3 38:10-22
34	1-5 and 9-11		
35	17-19	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]	
39	1-2 and 5 10 (from "so") – 15 17-22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va.	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]</p>	
40	1-2		
42	21-22	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity.</p>	43:2-5
43	1, 6-11 and 17-22	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel</p>	43:2-5 43:12-16

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		[Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity.	
44	1		
46	10-15 and 19-22	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity.</p> <p>Incomplete/Inaccurate. Ms. Heard's counsel withdrew and re-posed the question, but omitted the second question.</p>	
48	5-11 and 13-21	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15;</p>	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity.	
49	5-7 and 14	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity.	49:8-12
50	2-11 and 14-16	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]	50:12-13
52	3-6 and 10-22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va.	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity.</p>	
59	10-13 and 19-22	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity.</p>	59:14-18 60:1-3
60	6-9 and 14-22	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). Legal conclusion. The witness lacked knowledge of the topics and Ms. Heard did not move to compel</p>	60:10-13 61:7-12

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		[Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]	
61	1-6 and 13	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]	61:7-12
64	17-20 [Replace "Deposition Exhibit No. 2" with Def Ex]	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]	64:21-65:5 65:10-19

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
65	6-8	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]</p>	
66	21 (from "can") – 22	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]</p>	
67	1-3 [Replace "Exhibit No. 2" with Def Ex]	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R.</p>	67:4-11

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]</p> <p>Omits response.</p>	
72	9, 11-13 and 16-20	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]</p> <p>Omits question.</p>	72:14-15 72:21-22
73	1 and 11-22 [Replace "Deposition Exhibit No. 3" with Def Ex]	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked</p>	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]</p>	
74	1-10	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]</p>	
75	8 (from "So") – 11 18-22	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the</p>	75:12-14

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		correct entity [Transcript 41:1-44:1.]	
76	1-2 and 4 19 (from "Are") – 22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]	76:3 75:12-13
77	I, 5-11 and 14-22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Improper Opinion/legal conclusion.	77:2-4
78	1-2	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]</p>	
80	3-18 [Replace "Deposition Exhibit No. 5" with Def Ex]	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]</p>	81:10-16
81	8-9 and 18-19	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not</p>	81:10-16

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901.)	
83	2-4 and 9-15	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Improper, Incomplete Hypothetical; Assumes facts not in evidence.	83:5-8 83:16-22
84	1-4 and 6-15	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney	83:16-22 84:16-85:1

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Improper Incomplete Hypothetical; Assumes facts not in evidence. Lack of Authentication. (Va. R. S. Ct. 2:901).	
85	2-3 and 5-11 12 (from "Do") -13 16-22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Improper Incomplete Hypothetical; Assumes facts not in evidence. Lack of Authentication. (Va. R. S. Ct. 2:901).	85:14-15
86	1-7 8 (from "And") – 13 18-22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15;	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Improper Incomplete Hypothetical; Assumes facts not in evidence. Lack of Authentication. (Va. R. S. Ct. 2:901).	
87	1-3 and 10-20	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Improper Incomplete Hypothetical; Assumes facts not in evidence. Lack of Authentication. (Va. R. S. Ct. 2:901).	87:4-9
89	3-4 [Referring to Deposition Exhibit 6; Replace with Def Ex] 11-22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked	90:1-5 90:15-17

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Improper Incomplete Hypothetical; Assumes facts not in evidence. Lack of Authentication. (Va. R. S. Ct. 2:901).</p>	
90	7-14 and 18-21	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).</p>	90:15-17
92	2-12 [Replace "Deposition Exhibit No. 7" with Def Ex] 17-22	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not</p>	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).</p>	
93	12-13 and 17-22	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).</p>	93:4-6 93:14-16
94	9-10 15 (from "T") – 21	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by</p>	94:11-13 94:22 95:3-5

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
95	2 and 6-12	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
99	20 (from "T'm") – 21 [Replace "Deposition Exhibit No. 9" with Def Ex]	Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
100	1-22	Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did	101:1-5

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901). Lacks Foundation/Speculation. (Va. R. S. Ct. 2:602.)	
101	7-16 and 20-22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	101:17-19
102	1-2 and 4-8 14 (from "Now") – 22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15;	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
103	1-7 and 12-19	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	103:20-104:1
104	3 14-16 (through "discovery") [Replace "Deposition Exhibit No. 10 with Def Ex] 18-22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by	103:20-104:1

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
105	1-8 and 10-15	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	105:9
107	9-10 (through "13") [Replace "Deposition Exhibit No. 13" with Def Ex] 11 (from "and") – 22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of	108:1-2

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Authentication. (Va. R. S. Ct. 2:901).	
108	3-4, 6-12 and 16-22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	108:1-2 108:13-15
109	1-6, 8-9 and 15-22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	109:10-14
110	12-15	Speculation; Lack of Personal Knowledge;	110:1-8

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		<p>Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).</p>	
113	13-14 [Replace "Exhibit 58" with Def Ex]	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]</p>	
114	9 and 14-22	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R.</p>	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).</p>	
115	1-6 20 (from "If") – 22	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).</p>	
116	1 and 7-22	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel</p>	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>[Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901). Compound; Objection to Form; Narrative.</p>	
117	1 (from "And") – 22	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).</p>	
118	1-18	<p>Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.)</p>	
119	1-10 and 13-22	<p>Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). Speculation; Lack of Personal Knowledge;</p>	119:11-12

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Lack of Foundation. (Va. R. S. Ct. 2:602.)	
120.	6-22	Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.)	
121	1-22	Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.)	
122	1-16 and 19-22	Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.)	122:17-18
123	19-22	Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.)	
124	1-8	Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.)	
125	9-15 16 (from "Now") – 22	Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
126	1-3 19 (from "Are") – 20 22	Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.)	126:21
127	1 3 (from "And") – 5 7-9	Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.)	127:6
129	20 (from "do") – 22	Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.)	
130	1-5, 11-12 and 16-17	Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.)	130:13-14 130:18-131:5
131	7-9 and 13-18	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript	130:18-131:5 131:10-12

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
132	5, 7-10 and 18	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	132:11-17
133	2 (from "would") – 6	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of	133:7-15

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		Authentication. (Va. R. S. Ct. 2:901).	
135	11 14-15 [Replace "Exhibit No. 22" with Def Ex] 22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2:402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
136	1-21	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	136:1
137	1, 3-8 and 14-22	Speculation; Lack of Personal Knowledge;	137:9-13

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		<p>Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).</p>	
138	8-10 [Replace "Exhibit 22" with Def Ex] 12-16	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).</p>	138:1-5 138:11 138:17
139	8-18 and 20-21	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked</p>	139:21-140:2

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).</p>	
140	3-5	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).</p>	
141	14-15 [Replace "Deposition Exhibit No. 52" with Def Ex] 22	<p>Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15;</p>	

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		44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
142	1-22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
143	1-7 and 12-22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the	143:8-11

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		correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
144	1-7 and 16-22	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	144:8-11
145	1-4 and 10-20	Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Relevance (Va. R. S. Ct. 2 :402.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	145:5-9 145:21-22

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146	2-3	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
148	2-9 [Replace "Deposition Exhibit No. 52" with Def Ex] 13-19	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	148:10-12
149	7-8 12 (from "I'm") – 22	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of	149:2-5 149:9-12

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		Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
150	1, 6-9, 13 and 21-22 [Replace "Deposition Exhibit No. 53" with Def Ex]	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	150:2-5 150:10-12
151	1-6 7 (from "And") – 16 18-20 and 22	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked	151:17 151:21

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		<p>knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).</p>	
152	8-11 16 (from "this") -22	<p>Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).</p>	
153	1-4 and 10-22	<p>Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover,</p>	

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		the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
154	1-18 and 22	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	154:19-21
155	1-4, 8-12 and 22	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney	155:5-7

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		entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
156	1 (through "54") [Replace "Deposition Exhibit No. 54" with Def Ex] 4-22	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802).	
157	1-3 and 11-22	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	157:5-10
158	1-5, 8-9 and 13-20	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover,	158:6-7 158:10-12

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		the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
158:	9 (from "Ms.") – 22 [Replace "Deposition Exhibit No. 56" with Def Ex]	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
160	1-2, 6-17 and 19-22	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by	

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		Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
161	1-10, 14-18 and 22	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
162	1-2, 4-18 (through "169") 21-22	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript	

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		41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
163	1-17	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
164	6-16 [Replace "Deposition Exhibit No. 57" with Def Ex] 20-22	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of	164:17-19

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		Authentication. (Va. R. S. Ct. 2:901).	
165	1-4, 6, 10-12 and 19-22	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
166	1 and 7-19	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	

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168	1-2, 4-9 and 15-21	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	168:10-14

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169	2-5 and 15-22 [Replace "Deposition Exhibit No. 60" with Def Ex]	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel . [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
170	1-13	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	170:14-22
171	1-7, 11-15 and 20-22	Relevance (Va. R. S. Ct. 2 :402.) Speculation;	171:8-10 171:16-19

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		Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.] Lack of Authentication. (Va. R. S. Ct. 2:901).	
172	1 and 5-8 12 (from "Do") – 13 17-22	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]	172:2-4
173	1-2, 7-12 and 16-22	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va.	

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		R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]	
174	4	Relevance (Va. R. S. Ct. 2 :402.) Speculation; Lack of Personal Knowledge; Lack of Foundation. (Va. R. S. Ct. 2:602.) Hearsay (Va. R. S. Ct. 2:802). The witness lacked knowledge of the topics and Ms. Heard did not move to compel [Transcript, 39:3-42:15; 44:2-46:6]. Moreover, the witness did not confirm that the Disney entity subpoenaed by Ms. Heard was the correct entity [Transcript 41:1-44:1.]	

**Deposition of Jack Whigham
January 20, 2021**

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21	12 (from "are") – 17 20 (from "I'd like") -22		
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24	1-2, 4-10 and 14-22	24:9-10: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence. 24:19: Hearsay (Va. R. S. Ct. 2:802).	24:11-13.
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27	1-3, 7-10, 12, 14-16 and 19-21	27:7-9: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence; Compound; Vague & Ambiguous. 27:15-18: Hearsay (Va. R. S. Ct. 2:802.)	27:11.
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		Ct. 2:602); Assumes Facts Not in Evidence; Vague & Ambiguous; Compound. 28:9-10: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Vague & Ambiguous.	28:11.
30	1-7 8 (from "and") – 9 12-13	28:8-9: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Vague & Ambiguous; Assumes Facts Not in Evidence.	30:10-11.
31	2-4 5 (from "Sauvage") – 8 11 and 15-16	31:7-8: Vague & Ambiguous. 31:15-16: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	31:9-10.
35	20 (from "And") - 22		
36	5-14 and 17-20		
38	21-22		
39	1-22		
40	1-12 and 14-22	40:9-12: Hearsay (Va. R. S. Ct. 2:802). 40:19-20: Hearsay (Va. R. S. Ct. 2:802).	40:13.
41	1-8 and 11-12	41:6-8: Hearsay, (Va. R. S. Ct. 2:802); Lacks Foundation, Lacks Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Misstates the Testimony.	41:9-10.
42	3-6, 8-14 and 19-22	42:3-6: Hearsay (Va. R. S. Ct. 2:802).	42:7.
43	1-2 and 4-6 8 (from "We") – 21	43:4-6: Hearsay (Va. R. S. Ct. 2:802).	
44	2-15 and 18-19		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
45	16-19 and 22	45:16-19: Assumes Facts Not in Evidence.	45:20-21.
46	1 and 3-11	46:1: Hearsay (Va. R. S. Ct. 2:802).	46:2.
47	4 (from "Did") – 7 8 (from "Do") - 18	47:19-22: Hearsay (Va. R. S. Ct. 2:802); Compound.	
48	3-14 and 17-18	48:12-13: Hearsay (Va. R. S. Ct. 2:802); Assumes Facts Not in Evidence.	48:1-2 48:15-16.
49	14 (from "Tell") – 17 20-22	49:18-19: Hearsay (Va. R. S. Ct. 2:802).	49:18-19.
50	1-3 10 (from "So") – 22	50:20-22: Hearsay (Va. R. S. Ct. 2:802).	
51	1, 5-13, 15-17 and 19-20	51:11-13: Hearsay (Va. R. S. Ct. 2:802). 51:17: Hearsay (Va. R. S. Ct. 2:802).	51:2-4 51:14 51:18.
54	8-20 [Replace "Whigham Deposition Exhibit 2" with Def Ex]	54:8-16: Objection to the questioner's lengthy characterization of the document, which speaks for itself; Asked & Answered.	54:21-22.
55	2-5 11 (from "you had") – 21	55:2-4 Assumes Facts Not in Evidence. 55:18-21: Compound; Vague & Ambiguous; Assumes Facts Not in Evidence.	55:1. 55:6-8. 55:22.
56	2-3 4 (from "and so") – 11 16-22	56:4-11: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance and Overbread (Va. R. S. Ct. 2:402); Compound; Vague & Ambiguous; Assumes Facts Not in Evidence.	56:1 56:12-15.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		56:20-22: Vague & Ambiguous; Asked & Answered.	
57	3-4 5 (from "And") – 6 12- 21	57:5-6: Vague & Ambiguous as to timeframe.	57:1-2 57:7-11.
58	5 (from "Was") – 8 10 (from "in other") – 12	58:5-8: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	58:9
62	1-5 [Replace "Whigham Exhibit 3" with Def Ex] 9-11 and 14-18	62:9-11: Vague & Ambiguous as to timeframe.	62:12-13.
63	19 (from "was") – 22	63:19-64:1: Hearsay (Va. R. S. Ct. 2:802); Assumes Facts Not in Evidence.	
64	1, 4-14 and 17-22	64:13-14: Hearsay (Va. R. S. Ct. 2:802).	64:2-3 64:15-16.
65	1-2 and 21-22	65:1-2: Hearsay (Va. R. S. Ct. 2:802); Attorney-Client Privilege. 65:21-22: Hearsay (Va. R. S. Ct. 2:802); Attorney-Client Privilege	65:3-9
66	1-2		67:2-9.
68	7-10		
70	17 (from "I'm") – 22 [Replace "Whigham No. 4" with Def Ex]		
71	1-9 and 13-19	71:7-9: Vague & Ambiguous as to "work with"; Assumes Facts Not in Evidence.	71:10-12.
85	11 (from ""Mr.") – 20 (through "that") [Replace "Exhibit 7" with Def Ex]		
88	15 (from "I") – 22		
89	1-14 and 19-21 22 (from "Let's")	89:15-17: Vague & Ambiguous; Assumes Facts Not in Evidence; Misstates the Testimony.	89:15-17.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
90	1-4 11 (from "not") – 16 19-21	90:1-3: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Improper Hypothetical Question; Vague & Ambiguous.. 90:14-16: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Vague & Ambiguous.	90:5-7; 90:10; 90:17-18.
91	4-22 [Replace "Whigham Exhibit 8" with Def Ex J]	91:4-22: Objection to the questioner's lengthy characterization of the document, which speaks for itself.	
92	1 (through "of") 4-11	92:4-10: Objection to questioner's continued lengthy characterization of the document, which speaks for itself.	
94	6 (from "So") – 10 15-22	94:6-10: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Compound; Assumes Facts Not in Evidence	94:11-14.
95	1-2, 5-14 and 18-22	94:21-95:2: Vague & Ambiguous as to time. 95:11-14: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence; Asked & Answered	95:3-4. 95:15-17.
96	1-6 7 (from "Who") 10-20	96:7: Assumes Facts Not in Evidence. 96:19-20: Hearsay (Va. R. S. Ct. 2:802); Vague & Ambiguous.	96:8-9; 96:21-22.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
97	1-14 and 17-22	97:12-14: Hearsay (Va. R. S. Ct. 2:802).	97:15-16.
98	1-4 19 (from "Did") - 22	98:19-22: Hearsay (Va. R. S. Ct. 2:802); Compound; Vague & Ambiguous as to timeframe.	
99	4-16 and 19-22	99:15-16: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602). 99:20: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	99:1-3; 99:17-18.
100	1 (from "do") - 4 8-9	100:1-4: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Compound; Assumes Facts Not in Evidence.	100:5-7.
102	16-22 [Replace "Whigham Exhibit 9" with Def Ex]		
103	1-5, 8-12 and 15	103:4-5: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602) 103:11-12: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	103:6-7 103:13-14.
104	2-8 [Replace "Whigham Exhibit 10" with Def Ex] 11-17 21 (from "By") -22	104:2-8: Assumes facts not in evidence. 104:18-21: Lack of Foundation, Lack of Personal Knowledge,	104:9-10 104:18-21

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence.	
105	1-2, 4-7 and 13-21	105:17-21: Vague & Ambiguous as to Time.	105:22.
106	2 and 7-11 17 (from "When") – 18 20-22	106:3-4: Improperly attempts to designate answer to question that was not designated; Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Hearsay (Va. R. S. Ct. 2:802); Vague & Ambiguous; Compound; Overboard.	106:1 106:5-6.
107	1-19 and 22	107:2-3: Hearsay (Va. R. S. Ct. 2:802). 107:10-12: Hearsay (Va. R. S. Ct. 2:802). 107:17-19: Compound; Assumes Facts Not in Evidence; Asked & Answered.	 107:20-21.
108	1-3 6 (from "Let's") – 16 [Replace "Whigham 12" with Def Ex] 20-22		
109	1 ("Correct" only) 2-12 and 16-22	109:8-12: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence.	109:13-15.
110	1-2 8-12 [Replace "Deposition Exhibit 13" with Def Ex] 16- 19	110:16-19: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Compound; Assumes Facts Not in Evidence.	110:20-22.
111	1-3 9-13 [Replace "Whigham 14" with Def Ex]		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
112	5 (from "So") – 22	112:5-22: Objection to the questioner's lengthy characterization of the document, which speaks for itself.	
113	1-13 14 (from "Were") – 15 20 (from "Were") – 22	113:1-4: Objection as above to the questioner's continued characterization of the document, which speaks for itself. 113:16-17: Vague & ambiguous. 113:20-22: Assumes Facts Not in Evidence.	113:16-17.
114	3-17 [Replace "Exhibit 14" with Def Ex] 21-22	114:14-17: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence.	114:1-2 114:18-19.
115	1-2 8-22 [Replace "Whigham Exhibit 15" with Def Ex]	115:8-22: Objection to the questioner's lengthy characterization of the document, which speaks for itself.	
116	1-22	116:1-22: Objection to the questioner's continued characterization, which speaks for itself.	
117	1-22	117:1-22: Objection to the questioner's continued characterization of the document, which speaks for itself.	
118	1-2, 14-17 and 21-22	118:1-2: Objection to the questioner's continued characterization of the document, which speaks for itself.	118:3-12 118:18-20.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		118:14-17: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence.	
119	1-5 and 8-11	119:3-5: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence; Asked & Answered.	119:6-7.
121	21-22 (through "18") [Replace "Deposition Exhibit 18" with Def Ex]		
122	4-5		
123	11-18 19 (from "So") – 22		
124	1 2 (from "So") – 6 [Referring to Exhibit 18; Replace with Def Ex] 7 (from "And") – 22		
125	4-8 17-22 [Replace "Whigham Exhibit 19" with Def Ex]	125:4-5: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	
126	1-8 and 11-12 13 (from "Now") -19 21 (from "You") – 22	126:9-10: Improperly attempts to designate answer to question that was not designated; Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Improper Opinion Testimony (Va. R. S. Ct. 2:701).	
127	1-2 3 (from "Who") -12		
128	1 (from "I'm") – 9 [Replace "Exhibit 20" with Def Ex] 15 (from "Do") – 22	128:8-11: Hearsay (Va. R. S. Ct. 2:802).	
129	1-3		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
	5 (from "And") – 6 [Replace "21" with Def Ex] 9-16		
131	1-3 6 ("we'll go to Exhibit" and "22" only) [Replace "Exhibit 22" with Def Ex] 10-14 15 (from "When") – 17		
132	10-14 15 (from "Now") – 22 [Replace "Whigham Exhibit 22" with Def Ex]		
133	2-7 20 (from "Let's") – 22 [Replace "Exhibit 23" and "Whigham 23" with Def Ex]		133:9-11.
134	1-3 18 (from "So") – 22		
135	1-9 and 12-17 18 (from "And") – 22	135:6-8: Assumes Facts Not in Evidence.	135:10-11.
136	1-7, 10-14 and 17-21		
137	2 (from second "let's go to") – 22 [Replace "Exhibit 24" with Def Ex]	137:2-22: Objection to the questioner's lengthy characterization of the document, which speaks for itself.	
138	1-3 11 (from "I'm") – 20 [Replace "No. 25" with Def Ex]	138:18-20: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence; Overbroad; Compound.	138:21-22.
139	3-8 11 (from "I'm") – 20 [Replace "Exhibit 26" with Def Ex]		139:1-2.
140	2 (from "I'm") – 8 [Replace Whigham Exhibit 27" with Def Ex] 11-20	140:13-20: Speculation (Va. R. S. Ct. 2:602).	
142	19-20 [Replace "Whigham Deposition		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
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143	5-9 20 (from "This") – 22		
144	1-22	144:11-12: Hearsay (Va. R. S. Ct. 2:802).	
145	1-13	145:2-4: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	
146	8 (from "You") – 11 15-22	146:8-11: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Argumentative.	146:12-14.
147	1-5		
149	1-8 [Replace "Whigham Exhibit 30" with Def Ex] 11-22	148:7-8: Assumes Facts Not in Evidence.	149:9-10.
150	1-5, 7-8 and 10-22	150:3-5: Relevance (Va. R. S. Ct. 2:402); Overbroad. 150:8: Hearsay (Va. R. S. Ct. 2:802); Relevance (Va. R. S. Ct. 2:402); Overbroad.	150:6. 150:9.
151	1-2 3 (from "was") – 8 11-13, 15-18 and 20-22	151:7-8: Hearsay (Va. R. S. Ct. 2:802). 151:13: Hearsay (Va. R. S. Ct. 2:802). 151:18: Hearsay (Va. R. S. Ct. 2:802). 151:22: Hearsay (Va. R. S. Ct. 2:802).	151:9-10. 151:14 151:19
152	1-4 and 7-22	152:1-4: Hearsay (Va. R. S. Ct. 2:802). 152:22: Assumes Facts Not in Evidence.	152:5-6.
153	1 and 4-21	153:2-3: Assumes Facts Not in Evidence.	153:2-3.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
154	1 (from "Do") – 5 8-13, 16 and 19-22	154:1-5: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Compound. 154:12-13: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602). 154:16: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Compound.	154:6-7. 154:14-15. 154:17-18.
155	4 (from "And") – 6 9-20	155:4-6: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	155:7-8.
158	6 (from "Would") -13		
174	19-22		
175	4-7		
178	7 (from "I") – 20	178:17-20: Hearsay (Va. R. S. Ct. 2:802).	178:21-22.
179	1-4		
184	21-22	184:21-22: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Vague & Ambiguous; Assumes Facts not in Evidence.	
185	1 and 4-9	185:1: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Vague & Ambiguous; Assumes Facts not in Evidence	185:2-3.

**Deposition of Edward White
February 2, 2022**

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
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9	4-15 and 22	9:22: Misstates testimony.	
10	1 and 4-14	10:1: Misstates testimony.	
19	5 [Replace "Exhibit 1" with Def Ex]		
20	9-11 and 17-22		
21	1-9 and 21-22		
22	1-3		
25	19-22		
26	1-12 and 18-22	26:9-12: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Assumes Facts Not in Evidence.	26:13-17.
27	1-7 and 12-21	27:5-7: Vague & Ambiguous.	27:8-9.
28	5-7 and 9-10		
29	5-6, 10-15 and 18-22	29:5-6: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602).	29:7-8.
30	1-11 and 21-22	30:21-22: Vague & Ambiguous.	
31	1 and 6-12		31:2-3.
32	18-20		
34	5-6 and 11-22	34:5-6: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Unfair Prejudice (Va. R. S. Ct. 2:403); Vague & Ambiguous.	34:7-9.
35	1-2 and 8-16	35:1-2: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Unfair Prejudice (Va. R. S. Ct. 2:403); Vague & Ambiguous.	35:3-6.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		35:14-15: Relevance (Va. R. S. Ct. 2:402); Unfair Prejudice (Va. R. S. Ct. 2:403).	
36	1-4, 7-14 and 17-22	<p>36:1-4: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Unfair Prejudice (Va. R. S. Ct. 2:403); Improper Opinion (Va. R. S. Ct. 2:701); Vague & Ambiguous</p> <p>36:8-10: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Unfair Prejudice (Va. R. S. Ct. 2:403); Improper Opinion (Va. R. S. Ct. 2:701); Vague & Ambiguous</p> <p>36:12-14: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Unfair Prejudice (Va. R. S. Ct. 2:403); Improper Opinion (Va. R. S. Ct. 2:701); Vague & Ambiguous</p> <p>36:21-22: Hearsay (Va. R. S. Ct. 2:802); Relevance (Va. R. S. Ct. 2:402); Unfair Prejudice (Va. R. S. Ct. 2:403)</p>	<p>36:5-6.</p> <p>36:15-16.</p>
37	4		37:1-2.
39	6-14		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
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55	11-15 and 17-20	55:11-15: Argumentative.	55:16.
56	7-11 and 18-21	56:20-21: Unintelligible; Vague & Ambiguous.	56:12-17. 56:22.
57	5-7, 9-10, 13-19 and 22	57:9-10: Unintelligible; Vague & Ambiguous; Asked & Answered. 57:16-19: Asked & Answered.	57:1-2. 57:11-12. 57:20-21.
58	1-2, 4-7 and 10-21	58:4-7: Unintelligible; Vague & Ambiguous; Asked & Answered. 58:19-21: Asked & Answered.	58:8-9. 58:22
59	4-7, 9-10, 12 and 15-21	59:9-12: Asked & Answered. 59:19-21: Asked & Answered.	59:1-4 59:11; 59:13-14. 59:22.
60	8-10		60:1-5.
117	4-5		
123	17-22	123:17-20: Relevance (Va. R. Sup. Ct. 2:402). 123:22: Relevance (Va. R. Sup. Ct. 2:402).	
124	1-11	124:3: Relevance (Va. R. Sup. Ct. 2:402). 124:7: Relevance (Va. R. Sup. Ct. 2:402).	
125	3-5, 9-12, 15-19 and 22	125:3-5: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Unfair Prejudice (Va. R. S. Ct. 2:403); Improper Opinion (Va. R. S. Ct. 2:701); Vague & Ambiguous; Assumes	125:6-7.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>Facts Not in Evidence.</p> <p>125:11-12: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Unfair Prejudice (Va. R. S. Ct. 2:403); Improper Opinion (Va. R. S. Ct. 2:701); Vague & Ambiguous; Assumes Facts Not in Evidence</p> <p>125:18-19: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Unfair Prejudice (Va. R. S. Ct. 2:403); Improper Opinion (Va. R. S. Ct. 2:701); Vague & Ambiguous; Assumes Facts Not in Evidence</p>	<p>125:13-14.</p> <p>125:20-21.</p>
126	2, 4-9 and 12-22	<p>126:2: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Unfair Prejudice (Va. R. S. Ct. 2:403); Improper Opinion (Va. R. S. Ct. 2:701); Vague & Ambiguous; Assumes Facts Not in Evidence</p> <p>126:7-9: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Unfair Prejudice (Va. R. S. Ct. 2:403); Improper</p>	<p>126:3.</p> <p>126:10-11.</p>

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		Opinion (Va. R. S. Ct. 2:701); Vague & Ambiguous; Assumes Facts Not in Evidence 126:16-18: Relevance (Va. R. S. Ct. 2:402); Improper Opinion (Va. R. S. Ct. 2:701). 126:22: Relevance (Va. R. S. Ct. 2:402).	
127	1 and 18-22		
128	1-8		
132	7-15	132:11-12: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602)	
133	4-18 [Referring to Deposition Exhibit 6; Replace with Def Ex]		
135	3-12		
136	9-22		
137	1-6 and 8-22		
138	1 and 4-22		
139	1-22	139:22: Hearsay (Va. R. S. Ct. 2:802).	
140	1-3, 6-14 and 18-22	140:1-3: Hearsay (Va. R. S. Ct. 2:802) 140:13-14: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Asked & Answered. 140:22: Argumentative.	140:4-5. 140:15-17.
141	1-2, 4-10, 12-17 and 21-22	141:1-2: Argumentative. 141:11: Argumentative. 141:15-17: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S.	141:3. 141:11. 141:18-20.

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Vague & Ambiguous; Asked & Answered	
142	1, 3-6 and 11-22	142:3-6: Lack of Foundation, Lack of Personal Knowledge, Speculation (Va. R. S. Ct. 2:602); Relevance (Va. R. S. Ct. 2:402); Hearsay (Va. R. S. Ct. 2:802); Vague & Ambiguous; Asked & Answered	142:7-10.
143	1-22		
144	1-4 [Referring to Deposition Exhibit 7; Replace with Def Ex] 9-19		
145	2-22		
146	1-22		
147	1-22		
148	1-22		
149	1-2, 6-16 and 20-22	149:1-2: Misstates testimony; Assumes Facts Not in Evidence; Argumentative. 149:14-16: Misstates testimony; Vague & Ambiguous.	149:3-5. 149:17-18.
150	1-8		
152	7-19		
153	18-22		
154	1-22		
155	1-10		
156	4-19 and 21-22		
157	1-22 [Referring to Deposition Exhibit 8; Replace with Def Ex]		
158	8-15		
164	8-22		
165	1-3		

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February 17, 2022**

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
7	4-21		
8	7-17 and 22		
9	1-22		
10	7-22		
11	1-9, 13-17 and 19-21		
12	1-3, 5-6 and 8-21		
13	6-22		
14	1-6, 8-16 and 18-22	Lines 18-22: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404)	14:7
15	1 and 13-18	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404)	
16	9-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404)	17:2-4, 10-14
17	1	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S.	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404)	
19	10-13 and 15-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404)	19:13-14
20	1 and 3-6	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404)	
21	11-21	All lines: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404) Lines 20-21: lack of foundation and calls for speculation (Va. R. S. Ct. 2:602); leading, assumes facts not in evidence	21:4-9 21:22 – 22:1
22	2-5 and 11-14	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); lack of foundation / personal knowledge and calls for speculation (Va. R. S. Ct. 2:602); improper	21:22 – 22:1 22:6-9 22:15-16 22:18-20

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		character evidence (Va. R. S. Ct. 2:404), leading, assumes facts not in evidence	
25	14 (from "please") [Replace "Exhibit 2" with Def Ex]		
26	7-17 [Referring to Exhibit 2; Replace with Def Ex]		
27	9-22	Lines 19-22: hearsay (2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404)	
28	1-7, 10-11, 13-16, 20 and 22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404); hearsay (Va. R. S. Ct. 2:802)	28:8-9, 17-18
29	1-12	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404)	
31	13-14, 16 and 18-22	Lines 13-14, 16: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative	31:15

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		(Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404)	
32	1-11	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404); expert testimony	
33	5 (from "please") [Replace "Exhibit 3" with Def Ex] 15-21		
34	5-7 and 11-22	Lines 11-22: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); hearsay (Va. R. S. Ct. 2:802)	
35	1-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602)	
36	13-14 and 18-21	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); improper character evidence (Va.	36:15-17

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		R. S. Ct. 2:404), leading, argumentative, assumes facts not in evidence	
37	1-11	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404)	
38	2-12 and 16-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404), leading	38:13-14
39	14 (from "back") – 22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); hearsay (Va. R. S. Ct. 2:802)	
40	1-14, 18 20 (from "back") – 22	All lines: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); lacks personal knowledge (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404)	40:15-17

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Lines 12:14: leading, argumentative	
41	1-4, 7 and 11-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); lacks personal knowledge / calls for speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404), leading, argumentative, assumes facts not in evidence	41:8-10
42	1-6, 11-13, 15-18, 20 and 22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	42:7-10
43	1-2 9 (from "Can") -10 [Replace "Exhibit 4" with Def Ex] 19-22	Lines 1-2: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
44	1-4 and 20-22		
45	1-9, 11-12 and 17-22	Lines 17-22: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602)	
46	1-5, 8-17 and 19-22	Lines 1-5, 8-17: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct.	46:6-7

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); calls for speculation (Va. R. S. Ct. 2:602)	
47	1-2		
49	19-22		
50	1-22	Lines 2-4: relevance (2:402); improper character evidence (Va. R. S. Ct. 2:404) Lines 19-22: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
51	1-6	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
52	13-22	All lines: relevance (Va. R. S. Ct. 2:402); calls for speculation (Va. R. S. Ct. 2:602) Lines 19-22: vague, ambiguous	
53	3-22	Relevance (Va. R. S. Ct. 2:402); vague, ambiguous	53:1-2
54	1-3, 5-6, 9 and 11-21	Lines 1-3: relevance (Va. R. S. Ct. 2:402) Lines 5-6, 9, 11-19: relevance (Va. R. S. Ct. 2:402); leading; speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404) Lines 20-21: relevance (Va. R. S. Ct. 2:402);	54:7-8 54:22

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		argumentative; vague, ambiguous ; calls for speculation (Va. R. S. Ct. 2 :602) ; improper character evidence (Va. R. S. Ct. 2 :404)	
55	2 and 4-20	<p>Lines 2, 4-17: relevance (Va. R. S. Ct. 2:402); speculation (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404)</p> <p>Lines 18-20: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); argumentative; leading; assumes facts not in evidence</p>	
56	2 and 4-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
57	1-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
58	11-13 and 21-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		character evidence (Va. R. S. Ct. 2:404)	
59	1-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
60	1-5	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
61	12-14 and 19-20	<p>Lines 12:14: incomplete designation as designation includes only a question with no answer.</p> <p>Lines 19:20: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)</p>	61:15-17 61:21-22
62	1-4 and 6-22	<p>Lines 1-4: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)</p> <p>Lines 6-22: Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice</p>	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		(Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
63	15-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
64	1	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
69	12-13 [Replace "Exhibit 6" with Def Ex] 19-22		
70	1-22	Lack of foundation / personal knowledge (Va. R. S. Ct. 2:602); hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
71	1-2, 6-7 and 11-15	Lack of foundation / personal knowledge (Va. R. S. Ct. 2:602); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	71:3-5 71:8-9
72	2 (from "I'd") – 3 [Replace "Exhibit 7" with Def Ex] 11-19		
73	21-22	Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
74	1-16 and 18-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); lacks foundation / personal knowledge (Va. R. S. Ct. 2:602)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
75	1-7 and 11-22	<p>Lines 1-7: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); lacks foundation / personal knowledge (Va. R. S. Ct. 2:602)</p> <p>Lines 11-15: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)</p> <p>Lines: 16-22: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)</p>	
76	1-7 11 (from "Let's") [Replace "Exhibit 8" with Def Ex]	Lines 1-7: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
77	1-19	Relevance (Va. R. S. Ct. 2:402)	
78	1-4 and 6-19	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); hearsay (Va. R. S. Ct. 2:802)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
79	1-16	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
80	1-15 19-20 [Replace "Exhibit 9" with Def Ex]	Lines 1-3: hearsay (Va. R. S. Ct. 2:802) All lines: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
81	7-11 and 16-22		
82	5-21	Lines 5-11: Hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602) Lines 12-21: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	82:22 – 83:1
83	2-12 [Replace "Exhibit 10" with Def Ex] 20-22	relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	
84	1-2 and 9-19	Relevance (Va. R. S. Ct. 2:402); unfair	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	
85	2-15 and 19-22	All lines: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602) Lines 19-22: hearsay (Va. R. S. Ct. 2:802)	
86	1-10	relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	
88	20 (from "Can") – 21 [Replace "Exhibit 12" with Def Ex]		
89	13-14 and 18-22		
90	1-5, 11-15 and 18-22	Lines 11-15, 18-22: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	90:16-17
91	1-9, 11-14, 17-18 and 20-22	hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	91:15-16
92	1-12 and 14-22	Line 1: hearsay (Va. R. S. Ct. 2:802); relevance	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>(Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404)</p> <p>Lines 7-10: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); improper character evidence (Va. R. S. Ct. 2:404)</p>	
93	1-22	Lines 3-22: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)	
94	1-11, 14-16 ,18-19 and 22	<p>Lines 1-3: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)</p> <p>Lines 4-11, 14-16, 18-19, 22: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation (Va. R. S. Ct. 2:602)</p>	94:12-13 94:20-21
95	1-3 and 20-22	Relevance (Va. R. S. Ct. 2:402)	
96	1-4, 7-9, 11, 14-19 and 21-22	All lines: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation / lacks	96:6 96:12-13

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>personal knowledge (Va. R. S. Ct. 2:602)</p> <p>Lines 21-22: hearsay (Va. R. S. Ct. 2:802)</p>	
97	1-22	<p>Lines 1-14: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)</p> <p>Lines 15-22: speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)</p>	
98	1, 4-9, 11-17 and 22	<p>Lines 1, 4-9: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)</p> <p>Lines 11-17, 22: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)</p>	98:2-3 98:18-20
99	1-22	<p>Lines 1-2: hearsay (Va. R. S. Ct. 2:802)</p> <p>Lines 3-22: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)</p>	
100	1-3 and 19-22	<p>Lines 1-3: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation (Va. R. S. Ct. 2:602)</p>	
101	1-9, 12-17 and 19-22	<p>relevance (Va. R. S. Ct. 2:402); unfair prejudice</p>	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		(Va. R. S. Ct. 2:403); speculation / lack of personal knowledge (Va. R. S. Ct. 2:602)	
102	1-12 and 15-22	<p>Lines 1-10: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculation (Va. R. S. Ct. 2:602)</p> <p>Lines 11-12, 15-22: hearsay (Va. R. S. Ct. 2:802); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403)</p>	102:13-14 103:1-4
103	6-10 [Replace "Exhibit 13" with Def Ex] 16-20	Lines 6-8: speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403)	
104	3-10	speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence	104:11-16
105	6-10 and 14-22	Speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403)	106:1-4
106	5-6	speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403)	106:1-4
108	5-9 and 13-22	speculation / lacks personal knowledge (Va. R. S. Ct. 2:602);	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		unfair prejudice (Va. R. S. Ct. 2:403)	
109	1-21	Lines 17-21: speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); unfair prejudice (Va. R. S. Ct. 2:403)	
118	22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
119	1-22 [Replace "Exhibit 15" with Def Ex]	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
120	8-17		
121	1-22	Lines 17-22: Hearsay (Va. R. S. Ct. 2:802)	
122	1-8, 10-18 and 20-22	Lines 1-8: speculation / lacks personal knowledge (Va. R. S. Ct. 2:602) Lines 7-8, 10-18: speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	122:9
123	1-14	Speculation / lacks personal knowledge (Va. R. S. Ct. 2:602)	
124	17-19 and 21-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S.	124:20

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
125	1-2 and 4-12	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	
127	13-14 [Replace "Exhibit 16" with Def Ex] and 21		
128	5-13, 16-17 and 19-20	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); lacks foundation / personal knowledge (Va. R. S. Ct. 2:602)	128:14-15 128:21-22
129	2, 4-8, 11-14 and 16	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); lacks foundation / personal knowledge (Va. R. S. Ct. 2:602)	129:9, 15
130	21-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); needlessly cumulative (Va. R. S. Ct. 2:403)	
131	1-15 and 19-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper	131:16-17

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		character evidence (Va. R. S. Ct. 2:404); needlessly cumulative (Va. R. S. Ct. 2:403)	
132	1-17	<p>Lines 1-9: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); needlessly cumulative (Va. R. S. Ct. 2:403)</p> <p>Lines 10-17: speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); relevance (Va. R. S. Ct. 2:402)</p>	
134	3-5 and 9-16	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); assumes facts not in evidence	134:6-8
135	6-8, 12-16 and 18-22	<p>Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); lacks foundation / personal knowledge (Va. R. S. Ct. 2:602); assumes facts not in evidence</p> <p>Lines 6-8: leading</p>	135:9-11
136	1-7, 10-11, 13-16 and 19-22	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404);	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		assumes facts not in evidence	
137	1-4	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence	
138	1-8 and 16-22	<p>Lines 1-2: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)</p> <p>Lines 3-6: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence</p> <p>Lines 7-8, 16-19: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); assumes facts not in evidence</p> <p>Lines 20-22: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403)</p>	138: 9-13
139	1-22	Lines 1-11: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403);	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>Lines 12-22: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence</p>	
140	1-21	<p>Lines 1-8: hearsay (Va. R. S. Ct. 2:802); relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404); assumes facts not in evidence</p> <p>Lines 9-21: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); speculative (Va. R. S. Ct. 2:602); assumes facts not in evidence</p>	
141	7-22	<p>Lines 7-19 : Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403)</p> <p>Lines 20-21 : relevance (Va. R. S. Ct. 2 :402) ; argumentative ; leading</p>	141:22-142-1
143	1-22	<p>Incomplete designation that starts in the middle of a question.</p> <p>Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403)</p>	
144	1-22	<p>Lines 1-3 : Relevance (Va. R. S. Ct. 2:402);</p>	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		<p>unfair prejudice (Va. R. S. Ct. 2 :403)</p> <p>Lines 4-22 : Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403) ; needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)</p>	
145	1-7 and 19-22	<p>Lines 1-7: Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2 :403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)</p> <p>Lines 19-22: relevance (Va. R. S. Ct. 2:402)</p>	
146	1-5, 7-13 and 17-21	<p>Lines 1-5, 7-13: relevance (Va. R. S. Ct. 2:402)</p> <p>Lines 17-18: unfair prejudice (Va. R. S. Ct. 2:403); lack of foundation / personal knowledge (Va. R. S. Ct. 2:602)</p>	146:6
147	17 (from "and") – 20		
148	2-4 and 6-7		
149	4-12, 17-19 and 21-22	<p>Lines 8-12, 17-19, 21-22: relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va.</p>	149:13-16

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		R. S. Ct. 2:404); speculation / lacks personal knowledge (Va. R. S. Ct. 2:602); argumentative	
150	1	Relevance (Va. R. S. Ct. 2:402); unfair prejudice (Va. R. S. Ct. 2:403); needlessly cumulative (Va. R. S. Ct. 2:403); improper character evidence (Va. R. S. Ct. 2:404)	

**Deposition of Ben Wizner
Designated Representative – American Civil Liberties Union
November 17, 2021**

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
12	6-9		
21	10-22		
22	1-5		
45	12-15 [Replace “Exhibit 37” with Def Ex]		
46	2		
47	3-10, 14-16 and 20-21	47:7-8: Lack of Foundation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602.) 47:14-16: Lack of Foundation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602.)	
48	3-7, 14-16 and 19-22	48:6-7: Lack of Foundation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602.) 48:19-22: Lack of Foundation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602.)	
49	1-2	Lack of Foundation,	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
		Lack of Personal Knowledge (Va. R. S. Ct. 2:602.)	
53	5-6 and 9-13 [Replace "Exhibit 37" with Def Ex]17-19	53:11: Lack of Foundation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602.) 53:17-19: Lack of Foundation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602.)	
54	11-14 and 17-22	54:20-22: Lack of Foundation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602.); Relevance (Va. R. S. Ct. 2:802.)	
55	1	Lack of Foundation, Lack of Personal Knowledge (Va. R. S. Ct. 2:602.); Relevance (Va. R. S. Ct. 2:802.)	
64	2-7, 10-12 and 15-18		65:6-20; 66:7-22.
67	14-16 and 20-22		
68	1-2 and 8-9		
100	17-22	100:21-22: Relevance (Va. R. S. Ct. 2:802.)	
101	1-7 and 11-19	101:1-5: Relevance (Va. R. S. Ct. 2:802.) 101:11-19: Relevance (Va. R. S. Ct. 2:802.)	
109	8 (from "please") [Replace "Exhibit 33" with Def Ex] 13 (from "if") -22 [Replace "Exhibit 33" with Def Ex]		
110	1-3, 7-8 and 10-14		
147	2 (from "If") – 3 [Replace "Exhibit 3" with Def Ex]		
150	15-21		
151	2-3		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
153	8-9 and 11-22	153:11-18 Improper Opinion Testimony (Va. R. S. Ct. 2:701); Relevance (Va. R. S. Ct. 2:402.) 153:21-22: Relevance (Va. R. S. Ct. 2:402.)	
154	1	Continued relevance objection from 153:21-22. <u>See</u> Va. R. S. Ct. 2:402.	154:2-14.
330	21 (from "can") – 22 [Replace "Heard 10" with Def Ex]		
331	5-15	331:11-13: Hearsay (Va. R. S. Ct. 2:802); Lack of Personal Knowledge (Va. R. S. Ct. 2:602). 331:14-15: Hearsay (Va. R. S. Ct. 2:602).	
302	6-9, 14-16 and 19-21	Designations are unintelligible.	

**Deposition of iO Tillett Wright
March 10, 2022**

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
9	6 (through "morning")		
14	10 (from "And") – 13		
18	18 (from "have") – 22		
19	7-9		
36	14 (from "If") – 17	Relevance (R. 2:402)	
37	8-10	Relevance (R. 2:402)	
44	12 (from "Mr.") – 21		
45	4 (From "What") – 8		
46	7 (from "In") – 9 13-14 and 21-22		
47	1-14		

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
49	1 (from "Before") [Replace "Exhibit 1" with Def Ex 977] 9-13 and 16-21		
50	5-17	Lines 9 (starting with "I") – 10: nonresponsive	
56	15 (from "Now") – 20		
57	10-11, 13-16 and 19-21		
58	3-7	Speculative (R. 2:602)	
65	21 (from "Putting") – 22		
67	1-2		
70	16 (from "And") – 18		
71	9 (from "I") – 17		
77	5-7, 9-15 and 18-22		
78	1-17		
79	6-13	Speculative (R. 2:602)	
80	7 (from "So") – 8 11-14 and 20-22	Lines 12-14, 20-22: Speculative (R. 2:602)	
81	1-7 8 (from "I'm") – 15	Lines 1-3: Speculative (R. 2:602)	
82	1-22	Lines 11-22: Narrative	
83	1-22	Lines 1-7: Narrative	
84	1-20 and 22		
85	14 (from "And") – 18		
87	13-20	Move to Strike: lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403); non-responsive	88:10-12, 15 88:22 – 89:3, 7-10 96:10-12, 16 94:21 – 95:6
89	18-22	Hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks personal knowledge (R. 2:602); speculative (R. 2:602); improper character evidence (R. 2:404); improper opinion	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
90	1-6 and 15-22	Hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks personal knowledge (R. 2:602); speculative (R. 2:602); improper character evidence (R. 2:404) Move to strike lines 15-20 on the grounds stated.	88:10-12, 15 88:22 – 89:3, 7-10 94:21 – 95:7 310:22 – 311:4 311:6-9, 13-15, 19 312:7-10, 18 312:19 – 313:1 314:9-10
91	1 and 5-21	Move to strike lines 5-21: non-responsive; narrative; hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks personal knowledge / foundation (R. 2:602); speculative (R. 2:602); assumes facts not in evidence	92:1-2 88:10-12, 15 88:22 – 89:3, 7-10 94:21 – 95:7 310:22 – 311:4 311:6-9, 13-15, 19 312:7-10, 18 312:19 – 313:1 314:9-10
95	1		95:22
96	1-3, 6-9 and 19-22	Move to strike Lines 6-9: non-responsive; hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks personal knowledge / foundation (R. 2:602); speculative (R. 2:602); assumes facts not in evidence	96:10-12, 16 88:10-12, 15 88:22 – 89:3, 7-10 94:21 – 95:7
97	1-4 and 6-21		97:22

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
98	1-8 and 10-16	<p>Lines 3-6: hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks personal knowledge / foundation (R. 2:602); speculative (R. 2:602); assumes facts not in evidence</p> <p>Lines 7-8, 10-16: unfair prejudice (R. 2:403); lacks personal knowledge / foundation (R. 2:602); speculative (R. 2:602); improper character evidence (R. 2:404); assumes facts not in evidence</p>	<p>310:22 – 311:4 311:6-9, 13-15, 19 312:7-10, 18 312:19 – 313:1 314:9-10</p>
99	1-22	<p>Hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks personal knowledge / foundation (R. 2:602); speculative (R. 2:602); improper character evidence (R. 2:404); assumes facts not in evidence</p> <p>Move to strike lines 11 (starting with “Cocaine”) -17 as non-responsive.</p>	<p>310:22 – 311:4 311:6-9, 13-15, 19 312:7-10, 18 312:19 – 313:1 314:9-10</p>
100	1 and 8-9	Lines 8-9: relevance (R. 2:402)	100:14-16
101	19-22	Relevance (R. 2:402); improper character evidence (R. 2:404)	
102	1-9, 11-14 and 17-22	Relevance (R. 2:402); improper character evidence (R. 2:404)	
103	1-11 16 (from “And”) – 17 19 and 21-22	Lines 1-9: Relevance (R. 2:402); improper character evidence (R. 2:404)	103:15

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
104	3-6, 8, 11-15 and 19-22	Relevance (R. 2:402); improper character evidence (R. 2:404); unfair prejudice (R. 2:403)	
105	1, 5, 8-9 and 13-17	Relevance (R. 2:402); improper character evidence (R. 2:404)	
106	8-9 and 22	Relevance (R. 2:402); improper character evidence (R. 2:404)	
107	1-2 and 10-21	Relevance (R. 2:402); improper character evidence (R. 2:404)	
108	3-7 and 12-16	Relevance (R. 2:402); improper character evidence (R. 2:404)	
109	1-6, 8-9 and 12-16	Relevance (R. 2:402); improper character evidence (R. 2:404)	
110	15-21	Relevance (R. 2:402); improper character evidence (R. 2:404)	
111	5-6, 12-15 and 17-22	Relevance (R. 2:402); improper character evidence (R. 2:404)	
112	1-4 and 11-21	Relevance (R. 2:402); improper character evidence (R. 2:404)	
113	11-22	Move to strike: non-responsive; unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculative (R. 2:602); assumes facts not in evidence; narrative	88:10-12, 15 94:21 – 95:7 96:10-12, 16 116:21-22
114	1-22	Move to strike: non-responsive; unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculative (R. 2:602); assumes facts not in evidence; hearsay (R. 2:802); narrative	88:10-12, 15 94:21 – 95:7 96:10-12, 16 116:21-22

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
115	1-22	Move to strike: non-responsive; unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculative (R. 2:602); assumes facts not in evidence; narrative	88:10-12, 15 94:21 – 95:7 96:10-12, 16 116:21-22
116	1-20	Move to strike: non-responsive; unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculative (R. 2:602); assumes facts not in evidence; narrative	88:10-12, 15 94:21 – 95:7 96:10-12, 16 116:21-22
117	20-22		
118	4-9		
123	12 (from “my”) – 13		
124	11 and 18-22		
125	1-2 and 15-17	Needlessly cumulative (R. 2:403)	
129	6-8 10 (from “Let’s) - 11 [Replace “Depp Exhibit 1” with Def Ex 977] 13-22		
130	1-10 and 18-22	Relevance (R. 2:402); needlessly cumulative (R. 2:403); unfair prejudice (R. 2:403); narrative	
131	1-22	Relevance (R. 2:402); needlessly cumulative (R. 2:403); unfair prejudice (R. 2:403); narrative	
132	1-22	Relevance (R. 2:402); needlessly cumulative (R. 2:403); unfair prejudice (R. 2:403); narrative	
133	1-22	Relevance (R. 2:402); needlessly cumulative (R. 2:403); unfair prejudice (R. 2:403); narrative	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
134	1-22	Relevance (R. 2:402); needlessly cumulative (R. 2:403); unfair prejudice (R. 2:403); narrative	
135	1-15	Relevance (R. 2:402); needlessly cumulative (R. 2:403); unfair prejudice (R. 2:403); narrative	
136	5-16	Relevance (R. 2:402); unfair prejudice (R. 2:403)	
137	18-19 and 21-22	Relevance (R. 2:402); unfair prejudice (R. 2:403)	
138	1-13	Relevance (R. 2:402); unfair prejudice (R. 2:403)	
139	7-9, 11-17 and 21-22	All lines : relevance (R. 2:402); unfair prejudice (R. 2:403) Lines 7-9, 11: leading Lines 12-17, 21-22: hearsay (R. 2:802); misstates testimony; leading	139:10 139:18-19
140	1-21	Lines 1-15: Relevance (R. 2:402) Lines 16-21: leading; hearsay (R. 2:802); speculation (R. 2:602); unfair prejudice (R. 2:403); needlessly cumulative (R. 2:403); assumes facts not in evidence	140:22 310:22 – 311:4 311:6-9, 13-15, 19 312:7-10, 18 312:19 – 313:1 314:9-10

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
141	1-22	Move to strike: Non-responsive; narrative; hearsay (R. 2:802); improper character evidence (R. 2:404); speculation (R. 2:602); unfair prejudice (R. 2:403); needlessly cumulative (R. 2:403); assumes facts not in evidence	143:12-13 310:22 – 311:4 311:6-9, 13-15, 19 312:7-10, 18 312:19 – 313:1 314:9-10
142	1-22	Move to strike: Non-responsive; narrative; hearsay (R. 2:802); improper character evidence (R. 2:404); speculation (R. 2:602); unfair prejudice (R. 2:403); needlessly cumulative (R. 2:403); assumes facts not in evidence	143:12-13 310:22 – 311:4 311:6-9, 13-15, 19 312:7-10, 18 312:19 – 313:1 314:9-10
143	1-11, 17-18 and 22	Lines 1-11: Move to strike: Non-responsive; narrative; hearsay (R. 2:802); improper character evidence (R. 2:404); speculation (R. 2:602); unfair prejudice (R. 2:403); needlessly cumulative (R. 2:403); assumes facts not in evidence Lines 17-18, 22: relevance (R. 2:402); unfair prejudice (R. 2:402); improper character evidence (R. 2:404); assumes facts not in evidence; narrative	143:12-13 143:19-21 310:22 – 311:4 311:6-9, 13-15, 19 312:7-10, 18 312:19 – 313:1 314:9-10

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
144	1-22	Move to strike: non-responsive; relevance (R. 2:402); hearsay (R. 2:802); speculation (R. 2:602); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); assumes facts not in evidence; narrative	148:19-21
145	1-22	Move to strike: non-responsive; relevance (R. 2:402); hearsay (R. 2:802); speculation (R. 2:602); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); assumes facts not in evidence; narrative	148:19-21
146	1-22	Move to strike: non-responsive; relevance (R. 2:402); hearsay (R. 2:802); speculation (R. 2:602); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); assumes facts not in evidence; narrative	148:19-21
147	1-22	Move to strike: non-responsive; relevance (R. 2:402); hearsay (R. 2:802); speculation (R. 2:602); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); assumes facts not in evidence; narrative	148:19-21

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
148	1-18 and 22	<p>Lines 1-18: Move to strike: non-responsive; relevance (R. 2:402); hearsay (R. 2:802); speculation (R. 2:602); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); assumes facts not in evidence; narrative</p> <p>Line 22: relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence</p>	148:19-21
149	1-2 and 6-20	<p>All lines: Relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence</p> <p>Lines 18-20: leading</p>	149:3-5 149:21 – 150:1 150:10-11
150	12-22	<p>Relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence; leading</p>	150:10-11

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
151	3-13 and 17-22	Relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence	151:1-2 151:14-16 152:10-11
152	1-7 and 12-22	Lines 1-7: Relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence Lines 12-22: Move to strike: non-responsive; hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence	154:3-4
153	1-22	Move to strike: non-responsive; hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence	154:3-4

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
154	1-2 5 (from "And") – 7 16-22	<p>Lines 1-2: Move to strike: non-responsive; hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence</p> <p>Lines 5-7, 16-22: Move to strike: hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence</p>	154:3-4 154:8-10 155:9, 18
155	1-8, 10, 13-17 and 19-22	<p>Lines 1-8, 10, 13-17: Move to strike: hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence</p> <p>Lines 19-22: relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); calls for speculation (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence; leading; compound</p>	155:9, 18

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
156	6-13 and 16-22	<p>Lines 6-9: relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence</p> <p>Lines 10-13, 16-22: Move to strike: non-responsive; hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence, leading, compound</p>	156:1, 3 156:14-15 158:8-10
157	1-22	Move to strike: non-responsive; hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence, leading, compound	158:8-10

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
158	1-7	Move to strike: non-responsive; hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence, leading, compound	158:8-10
159	1-2, 8-17 and 20-22	<p>Lines 1-2, 8-14: Relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); assumes facts not in evidence</p> <p>Lines 15-17, 20-22: Move to Strike: non-responsive; relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence, leading</p>	159:3, 6-7 159:18-19 161:4-5

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
160	1-22	Move to Strike: non-responsive; relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence, leading	161:4-5
161	1-3 6 (from "And") – 9 12-22	<p>Lines 1-3: Move to Strike: non-responsive; relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence, leading</p> <p>Lines 6-9, 12-22: Move to Strike: non-responsive; hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence; narrative</p>	161:4-5 163:22 – 164:2

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
162	1-22	Move to Strike: non-responsive; hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence; narrative	163:22 – 164:2
163	1-18	Move to Strike: non-responsive; hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); needlessly cumulative (R. 2:403); assumes facts not in evidence; narrative	163:22 – 164:2
164	4-6 and 9-22	Move to Strike: non-responsive; relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; narrative	164:7-8 166:2-4
165	1-22	Move to Strike: non-responsive; relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; narrative	166:2-4

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
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167	4 (from "What") – 7 11-22	Move to Strike: non-responsive; relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; narrative; vague; ambiguous; compound; leading	167:8-10 168:19-20
168	1-18 and 21-22	Move to Strike: non-responsive; relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; narrative; vague; ambiguous; compound; leading	168:19-20
169	3-6 and 10-22	Move to strike: non-responsive; lacks foundation / personal knowledge (R. 2:602); hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); assumes facts not in evidence; narrative; leading	169:7-9 88:10-12, 15 94:21 – 95:7 96:10-12, 16 171:16-17

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170	1-22	Move to strike: non-responsive; lacks foundation / personal knowledge (R. 2:602); hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); assumes facts not in evidence; narrative; leading	88:10-12, 15 94:21 – 95:7 96:10-12, 16 171:16-17
171	1-8, 12-15 and 19-22	<p>Lines 1-3: Move to strike: non-responsive; lacks foundation / personal knowledge (R. 2:602); hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); assumes facts not in evidence; narrative; leading</p> <p>Lines 4-8, 12-15, 19-22: lacks foundation / personal knowledge (R. 2:602); unfair prejudice (R. 2:403); speculation (R. 2:602); assumes facts not in evidence; leading; compound</p>	171:9-10 171:16-17

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172	1-4 and 11-22	<p>Line 1: lacks foundation / personal knowledge (R. 2:602); unfair prejudice (R. 2:403); speculation (R. 2:602); assumes facts not in evidence; leading; compound</p> <p>Lines 2-4, 11-22: move to strike: non-responsive; referencing an inadmissible document; relevance (R. 2:402); hearsay (R. 2:802); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; leading</p>	<p>172:5-7 173:4-6</p>
173	1-2, 7-9 and 12-22	<p>Lines 1-2: move to strike: non-responsive; referencing an inadmissible document; relevance (R. 2:402); hearsay (R. 2:802); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; leading</p> <p>Lines 7-9, 12-22: hearsay (R. 2:802); unfair prejudice (R. 2:403); improper character evidence (R. 2:404); speculation (R. 2:602); lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence</p>	<p>173:4-6 173:10-11</p>

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174	1 and 21-22	Lines 21-22: hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); assumes facts not in evidence; leading	175:2
175	1, 3-6 and 11-22	Hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); assumes facts not in evidence	175:2 175:7-8
176	17 (from "What") – 19	Hearsay (R. 2:802); unfair prejudice (R. 2:403); assumes facts not in evidence; leading; improper character evidence (R. 2:404)	177:5
177	6-22	Move to strike: non-responsive; hearsay (R. 2:802); unfair prejudice (R. 2:403); assumes facts not in evidence; leading; improper character evidence (R. 2:404)	177:5 178:7-8

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178	1-6 14 (from "What") – 16 19-22	<p>Lines 1-6: Move to strike: non-responsive; hearsay (R. 2:802); unfair prejudice (R. 2:403); assumes facts not in evidence; leading; improper character evidence (R. 2:404)</p> <p>Lines 14-16, 19-20: leading; jury confusion (R. 2:403); unfair prejudice (R. 2:403); assumes facts not in evidence</p> <p>Lines 21-22: move to strike: non-responsive; unfair prejudice (R. 2:403); improper character evidence (R. 2:404); assumes facts not in evidence</p>	178:7-8 180:12-13
179	1-22	Move to strike: non-responsive; unfair prejudice (R. 2:403); improper character evidence (R. 2:404); assumes facts not in evidence	180:12-13

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180	1-11 and 14-22	<p>Lines 1-11: move to strike: non-responsive; unfair prejudice (R. 2:403); improper character evidence (R. 2:404); assumes facts not in evidence</p> <p>Lines 14-22: move to strike: non-responsive; unfair prejudice (R. 2:403); improper character evidence (R. 2:404); lacks foundation / personal knowledge (R. 2:602); narrative; assumes facts not in evidence</p>	180:12-13 182:9-10
181	1-22	Move to strike: non-responsive; unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); narrative; assumes facts not in evidence	182:9-10
182	1-6 and 21-22	<p>Lines 1-3: move to strike: non-responsive; unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); narrative; assumes facts not in evidence</p> <p>Lines 21-22: lacks foundation / personal knowledge (R. 2:602); unfair prejudice (R. 2:403); assumes facts not in evidence</p>	182:9-10

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184	1-22	Move to strike: non-responsive; hearsay (2:802); lacks foundation / personal knowledge (R. 2:602); unfair prejudice (R. 2:403)	189:2-4 88:10-12, 15 94:21 – 95:7 96:10-12, 16
185	1-22	Move to strike: non-responsive; hearsay (2:802); lacks foundation / personal knowledge (R. 2:602); unfair prejudice (R. 2:403)	189:2-4 88:10-12, 15 94:21 – 95:7 96:10-12, 16
186	1-22	Move to strike: non-responsive; hearsay (2:802); lacks foundation / personal knowledge (R. 2:602); unfair prejudice (R. 2:403)	189:2-4 88:10-12, 15 94:21 – 95:7 96:10-12, 16
187	1-22	Move to strike: non-responsive; hearsay (2:802); lacks foundation / personal knowledge (R. 2:602); unfair prejudice (R. 2:403)	189:2-4 88:10-12, 15 94:21 – 95:7 96:10-12, 16
188	1-20	Move to strike: non-responsive; hearsay (2:802); lacks foundation / personal knowledge (R. 2:602); unfair prejudice (R. 2:403)	189:2-4 88:10-12, 15 94:21 – 95:7 96:10-12, 16

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190	1-22	Move to strike: non-responsive; hearsay (R. 2:802); unfair prejudice (R. 2:403); speculative (R. 2:602); leading; vague; ambiguous; assumes facts not in evidence; narrative	191:1-3
191	6-9 and 12-22	Move to strike: non-responsive; unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculative (R. 2:602); hearsay (R. 2:802); improper character evidence (R. 2:404); leading; assumes facts not in evidence; narrative	191:1-3 196:2-3
192	1-22	Move to strike: non-responsive; unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculative (R. 2:602); hearsay (R. 2:802); improper character evidence (R. 2:404); leading; assumes facts not in evidence; narrative	196:2-3

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193	1-22	Move to strike: non-responsive; unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculative (R. 2:602); hearsay (R. 2:802); improper character evidence (R. 2:404); leading; assumes facts not in evidence; narrative	196:2-3
194	1-22	Move to strike: non-responsive; unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculative (R. 2:602); hearsay (R. 2:802); improper character evidence (R. 2:404); leading; assumes facts not in evidence; narrative	196:2-3
195	1-22	Move to strike: non-responsive; unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculative (R. 2:602); hearsay (R. 2:802); improper character evidence (R. 2:404); leading; assumes facts not in evidence; narrative	196:2-3

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197	1-2, 5-19 and 22	<p>Lines 1-2: leading, assumes facts not in evidence; lacks foundation / personal knowledge (R. 2:602); unfair prejudice (R. 2:403)</p> <p>Lines 15-19, 22: misstates testimony; hearsay (R. 2:802); relevance (R. 2:402); unfair prejudice (R. 2:403); improper character evidence (R. 2:404)</p>	<p>197:3-4 197:20-21</p>
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200	1-22	<p>Lines 1-7: relevance (2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); speculative (R. 2:602); based on hearsay (R. 2:802); assumes facts not in evidence</p> <p>Lines 13-15: calls for hearsay (R. 2:802); calls for narrative</p> <p>Lines 17-22: Move to Strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); narrative; unfair prejudice (R. 2:403)</p>	<p>206:4-5 355:17-18 356:2-8 (ending with “humor”) 357:1-2, 7-12, 17-18, 20-22 358:1-3</p>
201	1-22	<p>Move to Strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); narrative; unfair prejudice (R. 2:403)</p>	<p>206:4-5 88:10-12, 15 88:22 – 89:3, 7-10 94:21 – 95:7 96:10-12, 16</p>

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203	1-22	Move to Strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); narrative; unfair prejudice (R. 2:403)	206:4-5 88:10-12, 15 88:22 – 89:3, 7-10 94:21 – 95:7 96:10-12, 16
204	1-22	Move to Strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); narrative; unfair prejudice (R. 2:403)	206:4-5
205	1022	Move to Strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); narrative; unfair prejudice (R. 2:403)	206:4-5
206	1-3 22 (from “I’m”)	Lines 1-2: Move to Strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); narrative; unfair prejudice (R. 2:403)	206:4-5
207	1-3 [Replace “Exhibit 3” with Def Ex 1530] 16-22	Lines 1-3: authenticity Lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403); assumes facts not in evidence	

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209	19-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403); assumes facts not in evidence	216:19-20
210	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403); assumes facts not in evidence	<p>216:19-20 88:10-12, 15 94:21 – 95:7 96:10-12, 16</p>
211	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403); assumes facts not in evidence	<p>216:19-20 88:10-12, 15 94:21 – 95:7 96:10-12, 16</p>

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213	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403); assumes facts not in evidence	216:19-20 88:10-12, 15 94:21 – 95:7 96:10-12, 16
214	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403); assumes facts not in evidence	216:19-20 88:10-12, 15 88:22 – 89:3, 7-10 94:21 – 95:7 96:10-12, 16
215	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403); assumes facts not in evidence	216:19-20 372:13-19 373:2-9 374:4-7, 11-22 88:10-12, 15 88:22 – 89:3, 7-10 94:21 – 95:7 96:10-12, 16
216	1-17 and 21-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403); assumes facts not in evidence	216:19-20 372:13-19 373:2-9 374:4-7, 11-22 88:10-12, 15 88:22 – 89:3, 7-10 94:21 – 95:7 96:10-12, 16
217	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403); assumes facts not in evidence	218:19-21 88:10-12, 15 94:21 – 95:7 96:10-12, 16

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219	7-11 [Replace "Exhibit No. 5" with Def Ex 537] 18-22		
220	1-4 and 16-22	Hearsay (R. 2:802); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence	88:10-12, 15 94:21 – 95:7 96:10-12, 16
221	1-2 5 (from "is") – 7 and 10	Lacks foundation (R. 2:602)	
222	8-11 [Replace "Exhibit No. 6" with Def Ex 1493M] 20 (from "Please") – 21	Lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; speculation (R. 2:602); unfair prejudice (R. 2:403)	222:22 – 223:1
223	2-9, 13-19 and 22	Lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; speculation (R. 2:602); unfair prejudice (R. 2:403); improper opinion; leading	223:10-12 88:10-12, 15 94:21 – 95:7 96:10-12, 16
224	1-4 12-13 [Replace "Exhibit No. 7" with Def Ex 1493O] 17-19	Lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; speculation (R. 2:602); unfair prejudice (R. 2:403)	224:14-16 224:20-22 88:10-12, 15 94:21 – 95:7 96:10-12, 16

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225	1-6, 10 and 19-22	<p>Lines 1-3: Lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; speculation (R. 2:602); unfair prejudice (R. 2:403); hearsay (R. 2:802)</p> <p>All lines: Lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; speculation (R. 2:602); unfair prejudice (R. 2:403)</p>	<p>225:7-9 88:10-12, 15 94:21 – 95:7 96:10-12, 16 372:13-19 373:2-9 374:4-7, 11-22</p>
226	1, 4, 8-14 and 22	<p>Lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; speculation (R. 2:602); unfair prejudice (R. 2:403)</p>	<p>226:5-7 88:10-12, 15 94:21 – 95:7 96:10-12, 16</p>
227	1-2 [Replace “Exhibit No. 9” with Def Ex 1493X] 5-6 and 8-21	<p>All lines: Lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; speculation (R. 2:602); unfair prejudice (R. 2:403);</p> <p>Lines 8-13: hearsay (R. 2:802)</p> <p>Lines 18-21: leading</p>	<p>227:3-4 227:7 227:22 88:10-12, 15 94:21 – 95:7 96:10-12, 16 372:13-19 373:2-9 374:4-7, 11-22</p>
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229	1-5, 10-12 and 15-21	<p>Lines 10-12, 15-18: assumes facts not in evidence; unfair prejudice (R. 2:403)</p> <p>Lines 19-21: move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; speculation (R. 2:602); unfair prejudice (R. 2:403); leading, vague, ambiguous</p>	234:9-11
230	2-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; speculation (R. 2:602); unfair prejudice (R. 2:403); leading, vague, ambiguous	234:9-11 88:10-12, 15 94:21 – 95:7 96:10-12, 16
231	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; speculation (R. 2:602); unfair prejudice (R. 2:403); leading, vague, ambiguous	234:9-11 88:10-12, 15 94:21 – 95:7 96:10-12, 16
232	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; speculation (R. 2:602); unfair prejudice (R. 2:403); leading, vague, ambiguous	234:9-11 88:10-12, 15 94:21 – 95:7 96:10-12, 16

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234	1-7	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); assumes facts not in evidence; speculation (R. 2:602); unfair prejudice (R. 2:403); leading, vague, ambiguous	234:9-11 88:10-12, 15 94:21 – 95:7 96:10-12, 16
235	10-22 [Replace “Exhibit No. 13 with Def Ex 560]	Lines 18-22: hearsay (R. 2:802); unfair prejudice (R. 2:403); calls for speculation (R. 2:602)	88:10-12, 15 94:21 – 95:7 96:10-12, 16
236	1-13 and 16-18	Hearsay (R. 2:802); unfair prejudice (R. 2:403); speculation (R. 2:602)	236:14-15 88:10-12, 15 94:21 – 95:7 96:10-12, 16
237	6-10 [Replace “Exhibit No. 14” with Def Ex 575] 13-22	Hearsay (R. 2:802); lacks foundation / calls for speculation (R. 2:602); unfair prejudice (R. 2:403)	237:11-12 88:10-12, 15 94:21 – 95:7 96:10-12, 16
238	1-12 and 15	Hearsay (R. 2:802); lacks foundation / calls for speculation (R. 2:602); unfair prejudice (R. 2:403)	238:13-14 88:10-12, 15 94:21 – 95:7 96:10-12, 16
239	2-5 [Replace “Exhibit No. 15” with Def Ex 579] 8-14 and 20-22	Lacks foundation / calls for speculation (R. 2:602)	239:6-7 239:15-16
240	1-22	Hearsay (R. 2:802); lacks foundation / calls for speculation (R. 2:602); unfair prejudice (R. 2:403)	88:10-12, 15 94:21 – 95:7 96:10-12, 16

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242	1-22	Move to strike: non-responsive; hearsay (R. 2:802); speculation / lacks foundation (R. 2:602); unfair prejudice (R. 2:403)	244:6-7
243	1-22	Move to strike: non-responsive; hearsay (R. 2:802); speculation / lacks foundation (R. 2:602); unfair prejudice (R. 2:403)	244:6-7
244	1-2	Move to strike: non-responsive; hearsay (R. 2:802); speculation / lacks foundation (R. 2:602); unfair prejudice (R. 2:403)	244:6-7
245	17-20 [Replace “Exhibit No. 16” with Def Ex 616]	Lacks foundation, calls for speculation (R. 2:602)	245:21-22
246	1-3 and 5-22	Lines 5-6: hearsay (R. 2:802) Lines 9-21: speculation / lacks personal knowledge (R. 2:602); unfair prejudice (R. 2:403); relevance (R. 2:402) Line 22: hearsay (R. 2:802)	
247	1-21	Assumes facts not in evidence; unfair prejudice (R. 2:403); relevance (R. 2:402); lacks foundation / personal knowledge (R. 2:602)	

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248	9-12 [Replace "Exhibit No. 17" with Def Ex 638] 14-21	Relevance (R. 2:402); improper character evidence (R. 2:404); lacks foundation (R. 2:402)	248:22 – 249:1
249	5-11 and 14-22	Lines 5-11: Relevance (R. 2:402); improper character evidence (R. 2:404); lacks foundation (R. 2:402) Lines 14-22: lacks foundation / personal knowledge (R. 2:602); calls for hearsay (R. 2:802)	
250	1-22	Hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); unfair prejudice (R. 2:403)	252:3-5, 7-8
252	9 (from "I'm") – 22	Lines 9-14: calls for hearsay, narrative Lines 15-22: move to strike: non-responsive; lacks personal knowledge / speculation (R. 2:602); unfair prejudice (R. 2:403)	253:18-19
253	1-16 and 20-21	Lines 1-16: move to strike: non-responsive; lacks personal knowledge / speculation (R. 2:602); unfair prejudice (R. 2:403) Lines 20-21: leading	
254	1 (from "I'm") – 4 7-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence; narrative	267:19-21

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
255	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence; narrative	267:19-21
256	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence; narrative	267:19-21
257	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence; narrative	267:19-21
258	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence; narrative	267:19-21

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
259	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence; narrative	267:19-21
260	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence; narrative	267:19-21
261	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence; narrative	267:19-21 88:10-12, 15 88:22 – 89:3, 7-10 94:21 – 95:7 96:10-12, 16
262	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence; narrative	267:19-21 88:10-12, 15 88:22 – 89:3, 7-10 94:21 – 95:7 96:10-12, 16

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
263	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence; narrative	267:19-21 88:10-12, 15 88:22 – 89:3, 7-10 94:21 – 95:7 96:10-12, 16
264	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence; narrative	267:19-21 88:10-12, 15 88:22 – 89:3, 7-10 96:10-12, 16
265	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence; narrative	267:19-21 88:10-12, 15 88:22 – 89:3, 7-10 94:21 – 95:7 96:10-12, 16
266	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence; narrative	267:19-21 88:10-12, 15 94:21 – 95:7 96:10-12, 16

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
267	1-18 and 22	<p>Lines 1-18: Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence; narrative</p> <p>Line 22: relevance (R. 2:402); unfair prejudice (R. 2:403)</p>	<p>267:19-21 88:10-12, 15 94:21 – 95:7 96:10-12, 16</p>
268	1-4	Relevance (R. 2:402); unfair prejudice (R. 2:403)	
269	1-9, 13-16 and 19-22	Lines 1-9, 19-22: hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence	<p>269:10-12 269:17-18 88:10-12, 15 94:21 – 95:7 96:10-12, 16</p>
270	1-22	Hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence	<p>88:10-12, 15 88:22 – 89:3, 7-10 94:21 – 95:7 96:10-12, 16</p>
271	1-8 and 16-22 [Replace “Exhibit No. 21” with Def Ex 762]	Hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence	
272	1-12 and 21-22	Lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
273	1-18 [Replace "Exhibit No. 22" with Def Ex 832]	Hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence	
274	1-22	Lines 9-22: move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence	275:22 – 276:2 88:10-12, 15 94:21 – 95:7 96:10-12, 16
275	1-21	Move to strike: non-responsive; hearsay (R. 2:802); lacks foundation / personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:603); assumes facts not in evidence	88:10-12, 15 94:21 – 95:7 96:10-12, 16
276	3-13 and 17-21	Lines 3-7: relevance (R. 2:402); unfair prejudice (R. 2:403)	
277	15-18	Compound; leading; improper character evidence (R. 2:404); lacks personal knowledge (R. 2:602); calls for hearsay (R. 2:802); assumes facts not in evidence	277:19, 22
278	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403); compound; leading	281:6-7, 9-10 88:10-12, 15 94:21 – 95:7 96:10-12, 16

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
279	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403); compound; leading	281:6-7, 9-10 88:10-12, 15 94:21 – 95:7 96:10-12, 16
280	1-22	Move to strike: non-responsive; hearsay (R. 2:802); lacks personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403); compound; leading	281:6-7, 9-10 88:10-12, 15 94:21 – 95:7 96:10-12, 16
281	1-5 and 15	Lines 1-4: Move to strike: non-responsive; hearsay (R. 2:802); lacks personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403); compound; leading	281:6-7, 9-10 88:10-12, 15 94:21 – 95:7 96:10-12, 16
282	1-10 and 15-22	Move to strike: non-responsive; lacks foundation / personal knowledge (R. 2:602); calls for speculation (R. 2:602); unfair prejudice (R. 2:403)	282:11-13 283:14-15
283	1-11 and 16-22	Lines 1-11: move to strike: non-responsive; lacks foundation / personal knowledge (R. 2:602); calls for speculation (R. 2:602); unfair prejudice (R. 2:403) Lines 16-22: move to strike: non-responsive; speculation (R. 2:602); unfair prejudice (R. 2:403); expert testimony; lacks foundation (R. 2:602)	284:20-21

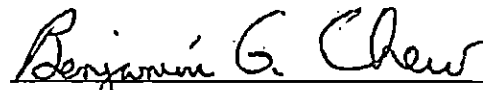
PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
284	1-18 and 22	Lines 1-18: move to strike: non-responsive; speculation (R. 2:602); unfair prejudice (R. 2:403); expert testimony; lacks foundation (R. 2:602)	284:20-21
285	1-12 and 15-22	Move to strike: non-responsive; speculation (R. 2:602); unfair prejudice (R. 2:403); lacks foundation (R. 2:602)	285:13-14 286:7-8
286	1-6, 9-13 and 17-18	Move to strike: non-responsive; speculation (R. 2:602); unfair prejudice (R. 2:403); lacks foundation (R. 2:602)	
287	1-6		
288	13-17 and 21-22	Lacks foundation / personal knowledge / calls for speculation (R. 2:602); assumes facts not in evidence; unfair prejudice (R. 2:403)	
289	1-7, 10-18 and 22	Lacks foundation / personal knowledge / calls for speculation (R. 2:602); assumes facts not in evidence; unfair prejudice (R. 2:403)	289:19-21
290	1-5, 9-15 and 21-22	Lacks foundation / personal knowledge / speculation (R. 2:602); assumes facts not in evidence; unfair prejudice (R. 2:403)	
291	3-5 and 8-9	Jury confusion / misleading the jury (R. 2:403)	
299	20 (from "And") – 22	Relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
300	1-3 and 6-18	Relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602); hearsay (R. 2:802)	
301	7-13	Relevance (R. 2:402); unfair prejudice (R. 2:403); lacks foundation / personal knowledge (R. 2:602)	
315	16-19	Needlessly cumulative (R. 2:403); improper character evidence (R. 2:404)	
316	1-6 and 10-22	Lines 1-4: Needlessly cumulative (R. 2:403); improper character evidence (R. 2:404) Lines 10-22: lacks personal knowledge (R. 2:602); speculation (R. 2:602); unfair prejudice (R. 2:403)	
317	13 (from "Did") – 15, and 22	Incorrectly identified designation.	317:22 – 318:2, 6-12
318	1-6 (through "taken") 8-9	Incorrectly identified designation. Lacks personal knowledge (R. 2:602); speculation (R. 2:602); Unfair prejudice (R. 2:403)	317:22 – 318:2, 6-12 88:10-12, 15 94:21 – 95:7 96:10-12, 16
321	6-20	Improper designation of an answer without a question. Relevance (R. 2:402); improper character evidence (R. 2:404); unfair prejudice (R. 2:403)	321:21-22

PAGE	LINE	OBJECTIONS	COUNTER DESIGNATIONS
337	2 (from "And") – 4 10 and 15-22	Lines 19-22: speculation / lacks personal knowledge (R. 602); unfair prejudice (R. 2:403)	
338	1-15, 17-18 and 22	Lines 1-15: speculation / lacks personal knowledge (R. 602); unfair prejudice (R. 2:403)	
339	1-10	Move to strike: non-responsive; speculation / lacks personal knowledge (R. 602); unfair prejudice (R. 2:403); assumes facts not in evidence	

Dated: March 18, 2022

Respectfully submitted,



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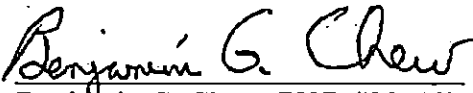
CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of March 2022, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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