

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

STATE OF WASHINGTON,

Plaintiff,

C17-5806RJB

v.

THE GEO GROUP, INC.,

Defendant.

UGOCHUKWU GOODLUCK
NWAUZOR, FERNANDO
AGUIRRE-URBINA, individually and
on behalf of all those similarly
situated,

C17-5769RJB

Plaintiffs,

COURT’S RULINGS ON
DEPOSITION OBJECTIONS

v.

THE GEO GROUP, INC., a Florida
corporation,

Defendant

This comes before the Court on submission of deposition designations by Plaintiffs in both cases. Objections to portions, and grounds for objections, were clearly marked on the documents. The Court has reviewed and considered each objection and has ruled on each objection. The Court’s rulings are marked on the attached sheets, as follows:

1 For Plaintiff State of Washington's submissions, the rulings are marked on the ruling
2 sheets submitted by counsel, with an "O" indicating overruled and an "S" indicating sustained.

3 The sheets are attached for the following depositions:

4 Alisha Singleton
5 Bruce Scott
6 James Charles Hill
7 Iolani Menza
8 William McHatton
9 Ryan Kimble (30 (b)(6))
10 Bertha Henderson
11 Leonardo Jaramillo

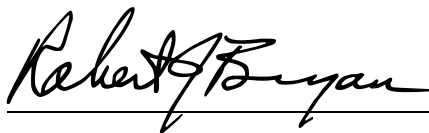
12 For Plaintiffs Nwauzor et al's submissions, the Court's rulings are marked on the ruling
13 sheets (table) submitted by counsel, with a check mark in the appropriate column indicating
14 "sustained" or "overruled." The sheets are attached for the following depositions:

15 Erwin Delacruz
16 Michael Heye
17 Marc A. Johnson
18 Bruce Scott, Jr. (30 (b)(6))
19 Bruce Scott (individually)
20 David Tracy

21 IT IS SO ORDERED.

22 The Clerk is directed to send copies of this Order to all counsel of record and to any party
23 appearing *pro se* at said party's last known address.

24 Dated this 20th day of May, 2020.



ROBERT J. BRYAN
United States District Judge

DEPOSITION OF: ALISHA SINGLETON

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 13		0
Page 14		0
Page 15:4-13, 25		0
	Page 15:14-15	5 (No Answer)
Page 16		0
Page 23:23-25		0
Page 24		0
Page 25		0
Page 27		0
Page 28		0
Page 29		0
	Page 29:17-20	0
Page 30		0
Page 31		0
Page 32		0
Page 33		0
Page 34		0
Page 35		0
Page 36		0
Page 37		0
Page 38		0
Page 39		0
Page 42		0
Page 43		0
Page 44		0
Page 45		0
Page 46		0
Page 47		0
Page 48		0
Page 50		0
Page 51		0
Page 52		0
Page 54		0
Page 56		0
Page 59		0
Page 60		0
Page 61		0
Page 62		0
Page 63		0
Page 64		0

Singleton P. 2

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 65		0
Page 66		0
Page 67		0
Page 69		0
Page 70		0
	Page 70:6-8	0
Page 71		0
Page 72		0
Page 73		0
Page 74		0
Page 75		0
Page 77		0
Page 78		0
Page 79		0
Page 80		0
Page 81		0
Page 82		0
Page 83		0
Page 84		0
Page 85		0
	Page 85:10-15	<i>S - No Q</i>
Page 86		0
Page 87		0
Page 88		0
Page 89		0
Page 90		0
Page 91		0
Page 92		0
	Page 92:18-25	0
Page 93		0
Page 94		0
Page 95		0
Page 96		0
Page 97		0
Page 98		0
Page 100		0
Page 101		0
Page 102		0
Page 104		0
	Page 104:5-8	<i>except S - No Q</i>
Page 105		0
Page 109		0

Singleton P.3

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 110		0
Page 111		0
Page 112		0
Page 117		0
Page 119		0
Page 120		0
Page 121		0
Page 122		0
Page 123		0
Page 124		0
Page 125		0
Page 127		0
Page 128		0
Page 129		0
Page 130		0
Page 131		0
Page 132		0
Page 133		0
Page 134		0
Page 135		0
Page 136		0
Page 137		0
Page 138		0
Page 139		0
Page 140		0
Page 141		0
Page 142		0
Page 143		0
Page 144		0
Page 145		0
Page 151		0
Page 154		0
Page 158		0
Page 161		0
Page 162		0
Page 163		0
Page 166		0
Page 167		0
Page 168		0
Page 170		0
Page 171		0
Page 172		0

Singleton P.4

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 173		0
Page 174		0
Page 175		0
Page 176		0
Page 177		0
Page 180		0
Page 181		0
Page 182		0
Page 183		0
Page 186		0
	Page 195:20-25	0
Page 196		0
Page 197		0
Page 198		0
Page 199		0
	Page 200:16-21	0 except 5 & 21
Page 201		0
	Page 201:9-13	0
Page 202		0
Page 203		0
Page 204		0
	Page 206:22-25	0
	Page 207:1-8	0
Page 209		0
Page 211		0
Page 212		0
Page 217		0
Page 218		0
Page 219		0
Page 220		0
Page 221		0
		0
Page 223		0
Page 224		0
Page 225		0
Page 226		0
Page 227		0
Page 228		0
Page 229		0
Page 230		0
Page 231		0
Page 233		0

Singleton P.5

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 235		0
Page 241		0
Page 242		0
Page 243		0
Page 244		0
Page 245		0
Page 246		0
Page 259		0

DEPOSITION OF: BRUCE SCOTT

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 22		0
Page 23:1-5		0
Page 23:20-25		0
Page 24:1-3		0
Page 24:19-25		0
Page 25:1-5		0
Page 25:19-25		0
Page 26		0
Page 27		0
Page 28:2-12		0
Page 28:15-19		0
Page 30		0
Page 31:1-11		0
Page 31:23-25		0
Page 32		0
Page 34		0
Page 35		0
Page 36:2-13		0
Page 36:22-25		0
Page 37:1-16		0
Page 37:17-25		0
Page 38		0
Page 39:1-4		0
Page 39:18-25		0
Page 40:1-18		0
Page 40:19-24		0
Page 41		0
Page 47		0
Page 48		0
Page 49:2-16		0
Page 49:20-25		0
Page 50		0
Page 52:16-24		0
Page 53		0
Page 54		0
Page 55		0
Page 56		0
Page 57		0
Page 58		0
Page 59:1-3		0

Scott P. 2

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 59:11-23		0
Page 60		0
	Page 61:4-9	5 (No Q)
	Pages 64:22-65:2	0
		0
Page 65		0
Page 66		0
Page 67		0
Page 68		0
Page 69		0
Page 70:1-10		0
	Page 70:11-13	0
Page 71		0
Page 72		0
Page 73		0
Page 74		0
Page 78		0
Page 80		0
Page 81		0
	Page 82:2-7	0
	Page 82:15-25	0
	Page 83:15-23	0
	Page 84:3-11	0
Page 84		0
Page 85		0
	Page 86:6-11	5
Page 87		0
Page 93		0
Page 94		0
Page 95		0
Page 96:1-17		0
Page 96:18-22		0
Page 97		0
Page 98		0
Page 99		0
Page 100:1-6		0
Page 100:18-25		0
Page 101		0
	Pages 104:23-25, 105:1	5 (No Q)
Page 105:4-15		0
Page 106		0
Page 107:1-13		0

Scott R.3

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 107:19-25		0
Page 108		0
Page 109		0
Page 110		0
Page 111		0
Page 112		0
Page 113		0
Page 114		0
Page 117		0
Page 118		0
Page 120		0
Page 121		0
Page 123		0
Page 127		0
Page 128		0
Page 130		0
	Page 130:18-19	0
Page 136		0
	Pages 137:20-138:11	0
Page 140		0
Page 141		0
Page 143		0
Page 146		0
Page 147:7-13		0
	Page 147:14-23	0
Page 148		0
Page 149:1-7		0 1-4; 5-7
Page 149:16-25		0
	Pages 151:22-152:5	0
Page 152:6-9		0
Page 153		0
Page 154		0
Page 156		0
Page 157		0
Page 158		0
Page 159		0
Page 164:9-13		0
Page 164:24-25		0
Page 165:9-12		0
Page 165:18-22		0
Page 166		0
Page 167		0

Scott P. 4

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 168		0
	Pages 168:25-169:13	0
Page 170		0
	Pages 171:25-172:4	5 - No @
Page 172		0
	Page 173:3-14	0
	Page 173:22-174:9	0
Page 174		0
Page 175		0
Page 176		0

DEPOSITION OF: JAMES CHARLES HILL

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 19		0
Pages 22-23		0
Page 26		0
Pages 40-41		0
Page 42		0
Pages 46		0
Pages 50-51		0
Pages 54		0
Pages 58		0
Pages 62		0
Page 66		0
Page 70		0
Page 74		0
Page 78		0
Pages 82		0
Page 86		0
Pages 90-91		0
Page 94		0
Pages 98		0
Page 102		0
Page 106		0
Page 110		0
Page 114		0
Page 118		0
Page 122		0
Page 126		0
Page 130		0
Page 138		0
Page 145		0
Page 148		0
Page 150		0
Pages 152		0
Page 155		0
Page 158		0
Page 162		0
Page 166		0
Page 170		0
Page 178		0
Page 184		0
Page 186		0
Page 190		0
Page 198		0
Page 202		0
Page 208		0
Pages 219		0

FILED P. 2

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Pages 222-223 Pages 227-228		0 0
Pages 231-232		0
Page 237		0
Page 238		0
Page 244		0
Page 246		0
Page 252		0

DEPOSITION OF: IOLANI MENZA

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 21		0
Page 23		0
Page 25		0
Page 28		0
Page 29		0
Page 30		0
Page 31		0
Page 32		0
Page 33		0
Page 34		0
Page 35		0
Page 36		0
Page 38		0
Page 39		0
Page 40		0
Page 42		0
Page 43		0
Page 44		0
Page 45		0
Page 46		0
	Page 46:1-2	0
Page 47		0
Page 48		0
Page 49		0
Page 50		0
Page 51		0
Page 52		0
Page 53		0
Page 54		0
Page 55		0
Page 56		0
Page 57		0
Page 58		0
Page 59		0
Page 60		0
	Pages 62:6-63:3	0
Page 63		0
	Page 65:2-7	5- No Q; No answer
Page 67		0

Menya p. 2

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 68		0
Page 69		0
	Page 69	0
Page 71		0
Page 72		0
Page 73		0
Page 74		0
	Page 74:16-33	0
Page 76		0
Page 77		0
	Page 77:17-19	0
	Page 78:9-14	52 9+10; 0211-14
Page 78		11
	Page 80:5-8	0
Page 80		0
Page 81		0
	Page 84:1-8	0
Page 84		0
Page 85		0
Page 86		0
Page 87		0
Page 88		0
Page 89		0
Page 90		0
Page 92		0
Page 93		0
Page 94		0
Page 99		0
Page 101		0
Page 109		0
Page 110		0
Page 111		0
Page 112		0
Page 113		0
Page 115		0
Page 116		0
Page 117		0
Page 118		0
Page 119		0
Page 120		0
Page 121		0
Page 122		0

Menga P. 3

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 123		0
Page 125		0
Page 126		0
Page 127		0
Page 128		0
Page 129		0
Page 130		0
Page 131		<i>except 219 is stricken</i>
Page 132		0
Page 133		0
Page 134		0
Page 135		0
Page 136		0
Page 137		0
Page 138		0
Page 139		0
Page 140		0

DEPOSITION OF: WILLIAM MCHATTON

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 12:1-13		0
Pages 16:7-14; 22-25 and 17:1		0
Page 20:1-12		0
Page 21:13-17		0
Page 22:3-11		0
Page 23:18-21		0
Page 25:5-19		0
Page 26:12-25		0
Page 27:1-23		0
	Pages 27:24-28:14	0
Page 30:4-12		0
Page 31:5-17		0
Page 32:21-25		0
Page 33:1-9, 15-22		0
Page 34:11-22		0
Page 35:1-4, 7-12		0
Page 36:1-7		0
Page 37:4-10, 14-18		0
Page 41:12-25		0
Page 42:1-9		0
Page 43:9-24		0
Page 44: 6		0
Page 44: 19-25		0
Page 45		0
Page 46		0
Page 47: 21-25		0
Page 48		0
	Pages 49:6 – 50:25	0
Page 51:13-20		0
Page 52		0
Page 53		0
Page 54		0
Page 55		0
Page 56		0
Pages 57:24-25, 58:1-3		0
Page 59:7-10		0
Pages 60, 61:1-3		0
Page 62:12-25		0
Page 63		0

M^cHatton P. 2

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 64:18-22		0
Page 66:8-23		0
Page 68		0
Page 69		0
Page 70		0
Page 71		0
Page 72:7-8		0
Page 73		0
Page 74		0
Page 75		0
Page 76:1-9		0
Page 77		0
Page 78		0
Page 79		0
Page 80		0
Page 81		0
	Page 82:5-13	S
Page 83		0
	Page 84:6-15	S (NO Q)
Page 84		0 except 26-15
	Page 86:5-6	S (NO Q)
Page 86		S 27-11, 0 to balance
Page 87		0
Page 88		0
Page 96		0
Page 97		0
Page 98		0
Page 103		0
Page 104		0
Page 106		0
Page 108		0
Page 111		0
Page 112		0
Page 113		0
Page 114		0
Page 115		0
Page 117		0
Page 118		0
Page 119		0 except 21-24
	Page 119:21-24	S
Page 120		0
Page 121		0

McHatton P.3

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 122		0
Page 123		0
Page 124		0
Page 125		0
Page 126		0
Page 127		0
Page 131		0
Page 132		0
Page 133		0
Page 139		0
Page 141		0
Page 142		0
Page 143:20-25		0
Page 144		0
Page 145		0
Page 146		0
Page 149		0
Page 150		0
Page 151		0
Page 152		0
Page 153		0
Page 154		0
Page 155		0
Page 156		0
Page 157		0
Page 158		0
Page 163		0
Page 164		0
Page 165		0
Page 168		0
Page 171		0
Page 172		0
Page 173		0
Page 174		0

DEPOSITION OF RYAN KIMBLE

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
	Pages 10:25-11:15	0
Pages 17, 20		0
	Pages 19:2-6 and 21:6-9	0 0
Pages 22-25		0
	Page 25:6-10	0
	Pages 27:4-14	0
	Pages 29:17-23	0
Page 30		0
	Page 33:7-9	0
	Page 34:3-9	0
Pages 38-41		0
Pages 42-45		0
	Page 43:5-44:8	0
Pages 46-49		0
Page 52		0
	Page 52:7-10	0
Page 66		0
	Pages 66:11-16 and 66:25-67:1	0
	Pages 70:9-15 and 71:2-10	0
Page 73		0
Page 74		0
Pages 78-81		0
Pages 90-91		0
Pages 106-109		0
Pages 110-113		0
	Page 111:8-15	0
	Pages 118:1-119:19	0
Page 120		0
Pages 122-125		0
Pages 126-129		0
	Page 127:3-9	0
	Page 130:13-22	0
	Page 137:2-19	0
Page 138		0

**DEPOSITION OF RYAN KIMBLE AS RULE 30(b)(6) DESIGNEE OF THE
GEO GROUP, INC.**

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
	Pages 20:19-21:2	0
	Page 22:5-13	5
Page 24:5-8, 17-25		0 0
Page 27		0
	Page 28:19-24	0
Page 30		0
Page 31		0
	Page 31:15-18	0
	Page 32:17-24	0
	Page 33:20-23	0
	Page 34:4-8	0
Page 34:15-25		0
Page 35		24-6:0; 16-20:5
Page 36		0
	Page 36:11-19, 23-25	0 0
	Page 37:1-9	0
Page 38		0
Page 39		0
Page 40		0
	Page 40:6-8	5
Page 41		0
Page 42		0
	Page 42:6-13	0
Page 43		0
Page 44		0
Page 45		0
Page 46		0
Page 47		0
Page 48		0
Page 49		0
Page 50		0
Page 51		0
Page 53		0
Page 54		0
Page 55		0
Page 56		0
	Page 56:3-6	0
Page 57		0

Kimble (3d(B)(a)) p. 2

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 58		0
Page 59		0
Page 60		0
	Page 61:6-13	0
Page 61		0
Page 62		
	Page 62:7-11, 16-19	S S (No Q's)
Page 76		0
Page 79		0
Page 80		0
Page 82		0
Page 83		0
Page 84		0
Page 85		0
Page 86		0
Page 87		0
Page 88		0
Page 89		0
Page 90		0
Page 91		0
Page 92		0
Page 93		0
Page 94		0
Page 95		0
Page 96		0
Page 97		0
Page 98		0
	Page 99:6-20, 16-19	S S (No Q's)
	Page 100:6-23	S (No Q)
Page 103		0
Page 104		0
Page 105		0
Page 106		0
Page 107		0
Page 108		0
Page 109		0
Page 111		0
Page 112		0
	Page 112:4-5	0
Page 113		0
Page 114		0
Page 115		0

Kimble (30(B)(6)) P. 3.

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 116		0
Page 117		0
Page 118		0
	Page 122:22-123:1	5 (No Q)
Page 125		0
Page 126		0
Page 128		0
Page 150		0
Page 151		0
Page 152		0
Page 153		0
	Page 153:18-154:6 and 154:10-13	5 (No Q) 5 (No Q)
Page 154		0 except 10-13
Page 155		0
Page 156		0
Page 157		0
Page 158		0
Page 159		0
Page 164		0
Page 165		0
Page 166		0
Page 167		0
Page 168		0
Page 169		0
Page 170		0
Page 171		0
Page 173		0
Page 174		0
Page 175		0
Page 176		0
Page 179		0
Page 180		0
Page 181		0
Page 182		0
Page 190		0
Page 191		0

DEPOSITION OF: BERTHA HENDERSON

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Page 17		0
Page 24: 1-8 + 26: 1-13		0 0
Page 27: 15-25		0
Page 28: 1-13		0
Page 29: 1-25		0
Page 30: 1-21		0
Pages 31:5-25; 32-1-2		0
Pages: 35:3-25, 36:1-25, 37: 1-25		0
Pages 38-41		0
Page 42: 1-25		0
Page 46: 11-21		0
	Page 52: 13-16; 52:24-53:1	0 0
Page 53: 19-25		0
Pages 54: 1-3; 57: 1-19		0 0
Pages 59-61		0
Pages 62-64		0
Pages 68:1-9; 69: 5-12		0 0
Pages 70-73		0
Pages 74-77		0
Pages 78-81		0
Pages 94: 6-25; 95; 96; 97: 7-25		0 0 0 0
Pages 98; 101		0
Pages 102-104		0
Pages 108-109		0
Pages 110; 112-113		0
Pages 114-117		0
Pages 118, 119, 121		0
Pages 122-125		0
Pages 126-129		0
Pages 130-133		0 0
Pages 134-137		0 0
Pages 138-141		0
Pages 142-145		0
Pages 146-147		0
Pages 154-157		0
Pages 158-161		0
Pages 162-164		0 0
Pages 166-169		0

Henderson P. 2

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
Pages 170-173		0
Page 174		0
Page 179		0
Page 182		0
Pages 186, 187, 189		0
Pages 190-193		0
Pages 194-197		0
Page 198		0
Pages 202-205		0
Pages 206-209		0
Pages 210, 213		0
Pages 223-225		0
Page 226		0
Page 230		0

DEPOSITION OF: LEONARDO JARAMILLO

GEO Objection to State Designation and State Response	State Response/Objection to GEO Counter-Designation	Ruling
	Page 25	S
	Page 26	23-0 13-5 after "No"
	Page 35 / Lines 16-18	0
	Page 37-38	0
	Page 69	S
	Page 72-73	S

The Honorable Robert J. Bryan

~~COPY FOR YOUR INFORMATION~~

UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF WASHINGTON
 AT TACOMA

UGOCHUKWU GOODLUCK
 NWAUZOR, FERNANDO AGUIRRE-
 URBINA, individually and on behalf of all
 those similarly situated,

Plaintiffs,

v.

THE GEO GROUP, INC., a Florida
 corporation,

Defendant.

No. 17-cv-05769-RJB

TABLE IDENTIFYING
 PLAINTIFFS' DEPOSITION
 DESIGNATIONS AND
 DEFENDANT'S OBJECTIONS

+ Court's Rulings

In accordance with this Court's letter dated May 8, 2020 (Dkt. No. 305), Plaintiffs respectfully identify for the Court the following deposition designations and Defendant's objections thereto:

ERWIN DELACRUZ			
Designation Page/Line	Objection	Sustained	Overruled
6:2-3			✓
6:15-18			✓

TABLE IDENTIFYING PLAINTIFFS' DEPOSITION DESIGNATIONS AND DEFENDANT'S OBJECTIONS - 1 (17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
 810 Third Avenue • Suite 500 • Seattle, WA 98104
 Phone (206) 622-8000 • Fax (206) 682-2305

ERWIN DELACRUZ			
Designation Page/Line	Objection	Sustained	Overruled
7:4-8:20	"Foundation, FRE 402; 701, 802."	✓	
12:9-20	"Foundation, FRE 402, 701, 802."		✓
16:6-8	"Foundation, FRE 402, 701, 802."		✓
18:10-13	"Foundation, FRE 402, 701, 802."		✓
18:16-19	"Foundation, FRE 402, 701, 802."		✓
18:21-22	"Foundation, FRE 402, 701, 802."		✓
19:16-17	"Foundation, FRE 402, 701, 802."		✓
21:14-23:11	"Foundation, FRE 402, 701, 802."		✓
29:12-14	"Foundation, FRE 402, 701, 802."		✓
29:17-24	"Foundation, FRE 402, 701, 802."		✓
33:2-7	"Foundation, FRE 402, 701, 802."		✓
35:13-15	"Foundation, FRE 402, 701, 802."		✓
35:17-36:10	"Foundation, FRE 402, 701, 802."		✓
41:1-4	"Foundation, FRE 402, 701, 802."		✓
45:17-24	"Foundation, FRE 402, 701, 802."		✓
47:15-17	"Foundation, FRE 402, 701, 802."		✓
47:19-23	"Foundation, FRE 402, 701, 802."		✓
48:3-25	"Foundation, FRE 402, 701, 802."		✓
49:2-8	"Foundation, FRE 402, 701, 802."		✓

ERWIN DELACRUZ			
Designation Page/Line	Objection	Sustained	Overruled
50:2-5	"Foundation, FRE 402, 701, 802."	✓	
52:9-10	"Foundation, FRE 402, 701, 802."		✓
52:12-14	"Foundation, FRE 402, 701, 802."		✓
52:16-23	"Foundation, FRE 402, 701, 802."		✓
54:1-3	"Foundation, FRE 402, 701, 802."		✓
54:23-25	"Foundation, FRE 402, 701, 802."		✓
55:16-23	"Foundation, FRE 402, 701, 802."		✓
55:25-56:7	"Foundation, FRE 402, 701, 802."		✓
56:9-12	"Foundation, FRE 402, 701, 802."		✓
56:14	"Foundation, FRE 402, 701, 802."		✓
57:23-58:4 11	"Foundation, FRE 402, 701, 802."		✓
58:6	"Foundation, FRE 402, 701, 802."		✓
58:8-11	"Foundation, FRE 402, 701, 802."		✓
59:20-62:10	"Foundation, FRE 402, 701, 802."		✓
64:1-67:18	"Foundation, FRE 402, 701, 802."		✓
69:14-70:5	"Foundation, FRE 402, 701, 802."		✓
70:11-13	"Foundation, FRE 402, 701, 802."		✓
70:15	"Foundation, FRE 402, 701, 802."		✓
70:17	"Foundation, FRE 402, 701, 802."		✓

ERWIN DELACRUZ			
Designation Page/Line	Objection	Sustained	Overruled
70:21-71:15	"Foundation, FRE 402, 701, 802."		✓
71:17-20	"Foundation, FRE 402, 701, 802."		✓
71:22-72:8	"Foundation, FRE 402, 701, 802."		✓
74:15-83:13	"Foundation, FRE 402, 701, 802."		✓
84:3-5	"Foundation, FRE 402, 701, 802."		✓
84:7-8	"Foundation, FRE 402, 701, 802."		✓
84:21-87:25	"Foundation, FRE 402, 701, 802."		✓
88:2-19	"Foundation, FRE 402, 701, 802."		✓
88:21-89:9	"Foundation, FRE 402, 701, 802."		✓
89:11-14	"Foundation, FRE 402, 701, 802."		✓
89:16	"Foundation, FRE 402, 701, 802."		✓
89:22-25	"Foundation, FRE 402, 701, 802."		✓
91:5-14	"Foundation, FRE 402, 701, 802."		✓
93:5-10	"Foundation, FRE 402, 701, 802."		✓
95:13-96:15	"Foundation, FRE 402, 701, 802."		✓
96:17-97:1	"Foundation, FRE 402, 701, 802."		✓
97:3-6	"Foundation, FRE 402, 701, 802."		✓
97:8-11	"Foundation, FRE 402, 701, 802."		✓
97:13	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 4
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

ERWIN DELACRUZ			
Designation Page/Line	Objection	Sustained	Overruled
101:8-102:2	"Foundation, FRE 402, 701, 802."		✓
102:19-23	"Foundation, FRE 402, 701, 802."		✓
105:14-17	"Foundation, FRE 402, 701, 802."		✓
105:19-106:9	"Foundation, FRE 402, 701, 802."		✓
109:4-6	"Foundation, FRE 402, 701, 802."		✓
109:8-10	"Foundation, FRE 402, 701, 802."		✓
113:2-15	"Foundation, FRE 402, 701, 802."		✓
113:23-24	"Foundation, FRE 402, 701, 802."		✓
114:1	"Foundation, FRE 402, 701, 802."		✓
114:10-23	"Foundation, FRE 402, 701, 802."		✓
114:25-116:5	"Foundation, FRE 402, 701, 802."		✓
119:9-22	"Foundation, FRE 402, 701, 802."		✓
120:5-7	"Foundation, FRE 402, 701, 802."		✓
120:9-14	"Foundation, FRE 402, 701, 802."		✓
120:20-121:6	"Foundation, FRE 402, 701, 802."		✓
122:3-5	"Foundation, FRE 402, 701, 802."		✓
122:17-18	"Foundation, FRE 402, 701, 802."		✓
122:20-124:12	"Foundation, FRE 402, 701, 802."		✓
125:8-10	"Foundation, FRE 402, 701, 802."		

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 5
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

ERWIN DELACRUZ			
Designation Page/Line	Objection	Sustained	Overruled
125:12-17	"Foundation, FRE 402, 701, 802."		✓
125:19-23	"Foundation, FRE 402, 701, 802."		✓
125:25-126:4	"Foundation, FRE 402, 701, 802."		✓
126:16-20	"Foundation, FRE 402, 701, 802."		✓
127:8-10	"Foundation, FRE 402, 701, 802."	✓	

MICHAEL HEYE			
Designation Page/Line	Objection	Sustained	Overruled
6:6-7			✓
7:7-8		✓	
9:7-10:6	"Foundation, FRE 402, 701, 802."	✓	
10:8-13	"Foundation, FRE 402, 701, 802."	✓	
10:18	"Foundation, FRE 402, 701, 802."	✓	
16:24-17:6			✓
18:2-14			✓
20:14-21:4	"Foundation, FRE 402, 701, 802."		✓
21:8-18	"Foundation, FRE 402, 701, 802."		✓
22:2-8	"Foundation, FRE 402, 701, 802."		✓
22:13-24	"Foundation, FRE 402, 701, 802."		✓

MICHAEL HEYE			
Designation Page/Line	Objection	Sustained	Overruled
23:19-24:7	"Foundation, FRE 402, 701, 802."		✓
25:18-26:3	"Foundation, FRE 402, 701, 802."		✓
32:5-8	"Foundation, FRE 402, 701, 802."		✓
32:10-13	"Foundation, FRE 402, 701, 802."		✓
32:15-16	"Foundation, FRE 402, 701, 802."		✓
32:18-19	"Foundation, FRE 402, 701, 802."		✓
42:4-13	"Foundation, FRE 402, 701, 802."		✓
43:10-44:1			✓
44:18-46:1	"Foundation, FRE 402, 701, 802."		✓
49:20-50:16	"Foundation, FRE 402, 701, 802."		✓
51:3-52:9	"Foundation, FRE 402, 701, 802."		✓
52:15-53:4	"Foundation, FRE 402, 701, 802."		✓
53:10-54:11	"Foundation, FRE 402, 701, 802."		✓
54:22-55:8	"Foundation, FRE 402, 701, 802."		✓
55:11-56:18	"Foundation, FRE 402, 701, 802."		✓
57:21-59:23	"Foundation, FRE 402, 701, 802."		✓
60:12-61:24	"Foundation, FRE 402, 701, 802."		✓
62:16-23	"Foundation, FRE 402, 701, 802."		✓
68:23-69:18	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 7
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

MICHAEL HEYE			
Designation Page/Line	Objection	Sustained	Overruled
71:14-25	"Foundation, FRE 402, 701, 802."		✓
72:3-4			✓
74:9-20	"Foundation, FRE 402, 701, 802."		✓
81:15-82:14	"Foundation, FRE 402, 701, 802."		✓
87:2-8	"Foundation, FRE 402, 701, 802."		✓
87:11-88:4	"Foundation, FRE 402, 701, 802."		✓
88:11-13	"Foundation, FRE 402, 701, 802."		✓
89:4-8	"Foundation, FRE 402, 701, 802."		✓
90:5-7	"Foundation, FRE 402, 701, 802."		✓
90:9-12	"Foundation, FRE 402, 701, 802."		✓
90:14-16	"Foundation, FRE 402, 701, 802."		✓
90:18-21	"Foundation, FRE 402, 701, 802."		✓
90:23-91:2	"Foundation, FRE 402, 701, 802."		✓
91:4-10	"Foundation, FRE 402, 701, 802."		✓
91:13-14	"Foundation, FRE 402, 701, 802."		✓
91:16-21	"Foundation, FRE 402, 701, 802."		✓
91:23-25	"Foundation, FRE 402, 701, 802."		✓
92:2-11	"Foundation, FRE 402, 701, 802."		✓
94:8-96:24	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 8
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

MICHAEL HEYE			
Designation Page/Line	Objection	Sustained	Overruled
97:3-5	"Foundation, FRE 402, 701, 802."		✓
97:13-98:9	"Foundation, FRE 402, 701, 802."		✓
106:20-22	"Foundation, FRE 402, 701, 802."	✓	
106:24-107:5	"Foundation, FRE 402, 701, 802."	106:24- 25	✓
107:7-22	"Foundation, FRE 402, 701, 802."		✓
107:24	"Foundation, FRE 402, 701, 802."		✓
108:10-14	"Foundation, FRE 402, 701, 802."		✓
114:14-15	"Foundation, FRE 402, 701, 802."		✓
115:7-10	"Foundation, FRE 402, 701, 802."		✓
115:24-116:7	"Foundation, FRE 402, 701, 802."		✓

MARC A. JOHNSON			
Designation Page/Line	Objection	Sustained	Overruled
5:9-10			✓
5:21-25			✓
7:16-8:23	"Foundation, FRE 402, 701, 802."	✓	
9:1		✓	
11:16-17	"Foundation, FRE 402, 701, 802."		✓
12:3-21	"Foundation, FRE 402, 701, 802."		✓

MARC A. JOHNSON			
Designation Page/Line	Objection	Sustained	Overruled
20:9-12	"Foundation, FRE 402, 701, 802."		✓
20:14-20	"Foundation, FRE 402, 701, 802."		✓
25:20-26:5	"Foundation, FRE 402, 701, 802."		✓
26:16-23	"Foundation, FRE 402, 701, 802."		✓
26:25-27:1	"Foundation, FRE 402, 701, 802."		✓
27:3-10	"Foundation, FRE 402, 701, 802."		✓
27:16-28:23	"Foundation, FRE 402, 701, 802."		✓
29:14-30:23	"Foundation, FRE 402, 701, 802."		✓
32:9-33:10	"Foundation, FRE 402, 701, 802."		✓
33:12-34:6	"Foundation, FRE 402, 701, 802."		✓
46:6-23	"Foundation, FRE 402, 701, 802."		✓
46:25	"Foundation, FRE 402, 701, 802."		✓
47:8-13	"Foundation, FRE 402, 701, 802."		✓
47:15	"Foundation, FRE 402, 701, 802."		✓
48:23-2	"Foundation, FRE 402, 701, 802."		✓
49:2	"Foundation, FRE 402, 701, 802."		✓
49:12-14	"Foundation, FRE 402, 701, 802."		✓
50:2-6	"Foundation, FRE 402, 701, 802."		✓
50:8-10	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 10
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

MARC A. JOHNSON			
Designation Page/Line	Objection	Sustained	Overruled
50:12	"Foundation, FRE 402, 701, 802."		✓
51:3-10	"Foundation, FRE 402, 701, 802."		✓
51:12-18	"Foundation, FRE 402, 701, 802."		✓
51:22-25	"Foundation, FRE 402, 701, 802."		✓
52:16-25	"Foundation, FRE 402, 701, 802."		✓
53:20-54:3	"Foundation, FRE 402, 701, 802."		✓
54:10-11	"Foundation, FRE 402, 701, 802."		✓
54:14-18	"Foundation, FRE 402, 701, 802."		✓
54:24-55:12	"Foundation, FRE 402, 701, 802."		✓
55:14	"Foundation, FRE 402, 701, 802."		✓
55:19-57:3	"Foundation, FRE 402, 701, 802."		✓
57:12-58:3	"Foundation, FRE 402, 701, 802."		✓
58:6-9	"Foundation, FRE 402, 701, 802."		✓
58:21-59:11	"Foundation, FRE 402, 701, 802."		✓
59:18-60:11	"Foundation, FRE 402, 701, 802."		✓
60:14-18	"Foundation, FRE 402, 701, 802."		✓
60:23-61:2	"Foundation, FRE 402, 701, 802."		✓
62:7-8	"Foundation, FRE 402, 701, 802."		✓
62:20-24	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 11
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

MARC A. JOHNSON			
Designation Page/Line	Objection	Sustained	Overruled
63:1-20	"Foundation, FRE 402, 701, 802."		✓
64:3-17	"Foundation, FRE 402, 701, 802."		✓
65:22-66:2	"Foundation, FRE 402, 701, 802."		✓
68:6-12	"Foundation, FRE 402, 701, 802."		✓
68:18-21	"Foundation, FRE 402, 701, 802."		✓
69:16-70:8	"Foundation, FRE 402, 701, 802."		✓
71:20-24	"Foundation, FRE 402, 701, 802."		✓
72:12-18	"Foundation, FRE 402, 701, 802."		✓
73:24-74:7	"Foundation, FRE 402, 701, 802."		✓

BRUCE SCOTT, JR., GEO 30(B)(6) DESIGNEE			
Designation Page/Line	Objection	Sustained	Overruled
6:9-12			✓
6:22-25			✓
7:5-8:4	"Foundation, FRE 402, 701, 802."	✓	
8:6-11	"Foundation, FRE 402, 701, 802."	✓	
8:13-23	"Foundation, FRE 402, 701, 802."		✓
8:25	"Foundation, FRE 402, 701, 802."		✓
9:2-3	"Foundation, FRE 402, 701, 802."		✓

BRUCE SCOTT, JR., GEO 30(B)(6) DESIGNEE			
Designation Page/Line	Objection	Sustained	Overruled
9:5	"Foundation, FRE 402, 701, 802."		✓
13:6-8	"Foundation, FRE 402, 701, 802."		✓
13:16-18	"Foundation, FRE 402, 701, 802."		✓
14:22-15:2	"Foundation, FRE 402, 701, 802."		✓
16:2-3	"Foundation, FRE 402, 701, 802."		✓
16:5-7	"Foundation, FRE 402, 701, 802."		✓
17:5-15	"Foundation, FRE 402, 701, 802."		✓
17:22-18:4	"Foundation, FRE 402, 701, 802."		✓
18:14-19	"Foundation, FRE 402, 701, 802."		✓
18:21-24	"Foundation, FRE 402, 701, 802."		✓
19:1-3	"Foundation, FRE 402, 701, 802."		✓
19:5-7	"Foundation, FRE 402, 701, 802."		✓
23:22-24	"Foundation, FRE 402, 701, 802."		✓
24:1	"Foundation, FRE 402, 701, 802."		✓
24:24-25:3	"Foundation, FRE 402, 701, 802."		✓
28:9-18	"Foundation, FRE 402, 701, 802."		✓
28:20-29:6	"Foundation, FRE 402, 701, 802."		✓
29:8-14	"Foundation, FRE 402, 701, 802."		✓
30:17-31:2	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 13
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

BRUCE SCOTT, JR., GEO 30(B)(6) DESIGNEE			
Designation Page/Line	Objection	Sustained	Overruled
36:8-13	"Foundation, FRE 402, 701, 802."		✓
36:15-18	"Foundation, FRE 402, 701, 802."		✓
36:20-37:2	"Foundation, FRE 402, 701, 802."		✓
61:23-62:24	"Foundation, FRE 402, 701, 802."		✓
64:11-21	"Foundation, FRE 402, 701, 802."		✓
66:20-23	"Foundation, FRE 402, 701, 802."		✓
66:25-67:2	"Foundation, FRE 402, 701, 802."		✓
67:4-9	"Foundation, FRE 402, 701, 802."		✓
69:22-24	"Foundation, FRE 402, 701, 802."		✓
70:18-21	"Foundation, FRE 402, 701, 802."		✓
70:25-71:1	"Foundation, FRE 402, 701, 802."		✓
71:3	"Foundation, FRE 402, 701, 802."		✓
71:16-17	"Foundation, FRE 402, 701, 802."		✓
71:21-22	"Foundation, FRE 402, 701, 802."		✓
71:24	"Foundation, FRE 402, 701, 802."		✓
72:1-2	"Foundation, FRE 402, 701, 802."		✓
72:4	"Foundation, FRE 402, 701, 802."		✓
74:6-18	"Foundation, FRE 402, 701, 802."		✓
75:14-20	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 14
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

BRUCE SCOTT, JR., GEO 30(B)(6) DESIGNEE			
Designation Page/Line	Objection	Sustained	Overruled
79:6-11	"Foundation, FRE 402, 701, 802."		✓
85:3-20	"Foundation, FRE 402, 701, 802."		✓
85:22	"Foundation, FRE 402, 701, 802."		✓
85:24-86:4	"Foundation, FRE 402, 701, 802."		✓
86:19-87:1	"Foundation, FRE 402, 701, 802."		✓
87:4-88:12	"Foundation, FRE 402, 701, 802."		✓
88:14-20	"Foundation, FRE 402, 701, 802."		✓
89:5-23	"Foundation, FRE 402, 701, 802."		✓
89:25-90:11	"Foundation, FRE 402, 701, 802."		✓
90:13-25	"Foundation, FRE 402, 701, 802."		✓
91:8-20	"Foundation, FRE 402, 701, 802."		✓
92:3-4	"Foundation, FRE 402, 701, 802."		✓
92:6-23	"Foundation, FRE 402, 701, 802."		✓
94:21-22	"Foundation, FRE 402, 701, 802."		✓
94:24-25	"Foundation, FRE 402, 701, 802."		✓
98:15-18	"Foundation, FRE 402, 701, 802."		✓
102:22-25	"Foundation, FRE 402, 701, 802."		✓
112:13-20	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 15
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

BRUCE SCOTT, INDIVIDUALLY			
Designation Page/Line	Objection	Sustained	Overruled
6:2-3			✓
6:10-13			✓
6:23-7:2			✓
8:5-12	"Foundation, FRE 402, 701, 802."	✓	
8:14-9:13	"Foundation, FRE 402, 701, 802."	✓	
8:15-16	"Foundation, FRE 402, 701, 802."	✓	
15:23-16:13	"Foundation, FRE 402, 701, 802."		✓
19:1-9	"Foundation, FRE 402, 701, 802."		✓
22:2-23:2	"Foundation, FRE 402, 701, 802."		✓
24:18-25:16	"Foundation, FRE 402, 701, 802."		✓
26:6-7	"Foundation, FRE 402, 701, 802."		✓
26:9-10	"Foundation, FRE 402, 701, 802."		✓
26:12-16	"Foundation, FRE 402, 701, 802."		✓
30:17-25	"Foundation, FRE 402, 701, 802."		✓
31:2-3	"Foundation, FRE 402, 701, 802."		✓
61:11-62:21	"Foundation, FRE 402, 701, 802."		✓
65:13-15	"Foundation, FRE 402, 701, 802."		✓
65:17-2	"Foundation, FRE 402, 701, 802."		✓
66:5-6	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 16
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

BRUCE SCOTT, INDIVIDUALLY			
Designation Page/Line	Objection	Sustained	Overruled
73:16-21	"Foundation, FRE 402, 701, 802."		✓
73:23-74:1	"Foundation, FRE 402, 701, 802."		✓
74:3-4	"Foundation, FRE 402, 701, 802."		✓

DAVID TRACY			
Designation Page/Line	Objection	Sustained	Overruled
10:2-3			✓
10:10-13			✓
10:19-22			✓
12:11-21	"Foundation, FRE 402, 701, 802."	✓	
12:25-13:13	"Foundation, FRE 402, 701, 802."	✓	
13:16-22	"Foundation, FRE 402, 701, 802."	✓	
14:2-3	"Foundation, FRE 402, 701, 802."	✓	
14:5	"Foundation, FRE 402, 701, 802."	✓	
17:4-5	"Foundation, FRE 402, 701, 802."		✓
17:21-18:9	"Foundation, FRE 402, 701, 802."		✓
18:23-19:6	"Foundation, FRE 402, 701, 802."		✓
21:5-22:14	"Foundation, FRE 402, 701, 802."		✓
21:16-19	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 17
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

DAVID TRACY			
Designation Page/Line	Objection	Sustained	Overruled
23:2-8	"Foundation, FRE 402, 701, 802."		✓
23:10-13	"Foundation, FRE 402, 701, 802."		✓
23:15-24	"Foundation, FRE 402, 701, 802."		✓
26:13-20	"Foundation, FRE 402, 701, 802."		✓
27:2-6	"Foundation, FRE 402, 701, 802."		✓
27:9-15	"Foundation, FRE 402, 701, 802."		✓
27:17	"Foundation, FRE 402, 701, 802."		✓
28:4-29:7	"Foundation, FRE 402, 701, 802."		✓
29:22-30:4	"Foundation, FRE 402, 701, 802."		✓
30:6	"Foundation, FRE 402, 701, 802."		✓
30:14-31:25	"Foundation, FRE 402, 701, 802."		✓
33:8-34:19	"Foundation, FRE 402, 701, 802."		✓
35:8-18	"Foundation, FRE 402, 701, 802."		✓
35:20-36:9	"Foundation, FRE 402, 701, 802."		✓
36:11	"Foundation, FRE 402, 701, 802."		✓
36:13-14	"Foundation, FRE 402, 701, 802."		✓
36:16-25	"Foundation, FRE 402, 701, 802."		✓
37:2-18	"Foundation, FRE 402, 701, 802."		✓
38:2-10	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 18
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

DAVID TRACY			
Designation Page/Line	Objection	Sustained	Overruled
39:3-40:8	"Foundation, FRE 402, 701, 802."		✓
40:16-41:19	"Foundation, FRE 402, 701, 802."		✓
41:25-42:2	"Foundation, FRE 402, 701, 802."		✓
42:4-14	"Foundation, FRE 402, 701, 802."		✓
42:21-43:11	"Foundation, FRE 402, 701, 802."	43:9-11	✓
44:5-46:3	"Foundation, FRE 402, 701, 802."		✓
46:5-6	"Foundation, FRE 402, 701, 802."		✓
46:11-18	"Foundation, FRE 402, 701, 802."		✓
49:6-25	"Foundation, FRE 402, 701, 802."		✓
51:2-21	"Foundation, FRE 402, 701, 802."		✓
51:23	"Foundation, FRE 402, 701, 802."		✓
52:10-16	"Foundation, FRE 402, 701, 802."		✓
52:18	"Foundation, FRE 402, 701, 802."		✓
53:5-20	"Foundation, FRE 402, 701, 802."		✓
54:7-12	"Foundation, FRE 402, 701, 802."		✓
56:1-3	"Foundation, FRE 402, 701, 802."		✓
56:5-12	"Foundation, FRE 402, 701, 802."		✓
59:1-2	"Foundation, FRE 402, 701, 802."		✓
59:4-10	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 19
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

DAVID TRACY			
Designation Page/Line	Objection	Sustained	Overruled
59:13-22	"Foundation, FRE 402, 701, 802."		✓
60:4-15	"Foundation, FRE 402, 701, 802."		✓
60:21-61:1	"Foundation, FRE 402, 701, 802."		✓
64:24-65:15	"Foundation, FRE 402, 701, 802."		✓
66:3-19	"Foundation, FRE 402, 701, 802."		✓
67:8-12	"Foundation, FRE 402, 701, 802."		✓
70:3-20	"Foundation, FRE 402, 701, 802."		✓
71:5-9	"Foundation, FRE 402, 701, 802."	71:8+9	✓
73:8-74:14	"Foundation, FRE 402, 701, 802."		✓
74:16-19	"Foundation, FRE 402, 701, 802."		✓
75:21-22	"Foundation, FRE 402, 701, 802."		✓
75:24	"Foundation, FRE 402, 701, 802."		✓
76:7-22	"Foundation, FRE 402, 701, 802."		✓
80:22-24	"Foundation, FRE 402, 701, 802."		✓
81:3-17	"Foundation, FRE 402, 701, 802."		✓
81:19-22	"Foundation, FRE 402, 701, 802."		✓
81:24-25	"Foundation, FRE 402, 701, 802."		✓
82:2-3	"Foundation, FRE 402, 701, 802."		✓
82:14-18	"Foundation, FRE 402, 701, 802."		✓

TABLE IDENTIFYING PLAINTIFFS'
DEPOSITION DESIGNATIONS AND
DEFENDANT'S OBJECTIONS - 20
(17-cv-05769-RJB)

SCHROETER GOLDMARK & BENDER
810 Third Avenue • Suite 500 • Seattle, WA 98104
Phone (206) 622-8000 • Fax (206) 682-2305

DAVID TRACY			
Designation Page/Line	Objection	Sustained	Overruled
83:21	"Foundation, FRE 402, 701, 802."		✓
83:23	"Foundation, FRE 402, 701, 802."		✓
84:13-20	"Foundation, FRE 402, 701, 802."		✓
86:6-8	"Foundation, FRE 402, 701, 802."		✓
86:17-87:5	"Foundation, FRE 402, 701, 802."		✓
88:3-25	"Foundation, FRE 402, 701, 802."		✓
89:2	"Foundation, FRE 402, 701, 802."		✓
93:3-9	"Foundation, FRE 402, 701, 802."		✓

DATED at Seattle, Washington this 15th day of May, 2020.

SCHROETER GOLDMARK & BENDER

s/ Jamal N. Whitehead

Adam J. Berger, WSBA #20714
Lindsay L. Halm, WSBA #37141
Jamal N. Whitehead, WSBA #39818
810 Third Avenue, Suite 500
Seattle, WA 98104
Tel: (206) 622-8000 ~ Fax: (206) 682-2305
berger@sgb-law.com
halm@sgb-law.com
whitehead@sgb-law.com

THE LAW OFFICE OF R. ANDREW FREE
Andrew Free (*Pro Hac Vice*)
P.O. Box 90568
Nashville, TN 37209
Tel: (844) 321-3221 ~ Fax: (615) 829-8959
andrew@immigrantcivilrights.com