

DEPOSITION DESIGNATIONS

Parties must submit the deposition designations by the deadline established by Court order.

Parties must submit paper copies of the deposition designations in compliance with the following rules:

- 1) Plaintiffs must highlight in yellow the portions they wish to offer.
- 2) Defendants must highlight in blue the portions they wish to offer.
- 3) If either party objects to the proposed testimony, the objections must be placed next to the proposed testimony in the margins. The objections must be as specific as possible, identifying the Rule of Evidence, Court order, or other basis for the exclusion. Generic objections are not appropriate. Objections should identify the basis for an objection but should not make argument. The following examples present correct and incorrect objections.

Incorrect: "Relevance"

Correct: "Relevance, Rule 402"

Incorrect: "Motion in Limine"

Correct: "Court Order 12/1/10, Doc. 39."

Incorrect: "Based on *Smith v. Jones*, this testimony is irrelevant because . . ."

Correct: "Relevance, Rule 402"

- 4) The response to the objection is to be placed under the specific objection, also in the margin, and following the same rules as above. For example:

Objection: Hearsay, Rule 802.

Incorrect: "Exception."

Correct: "Not offered for the truth. Offered to show intent. Rule 801."

Incorrect: "Exception."

Correct: "Business record exception under Rule 803(6)."

The Court will issue its rulings no later than the morning of the trial day that the designation is scheduled to be used.