**DEPOSITION DESIGNATIONS**

As explained in item 8 of Judge Alexakis’s Standing Order Governing Proposed Pretrial Orders, the parties must use this template to submit deposition designations if one or more witnesses will testify via deposition. For each witness who will so testify, the parties must complete the following table (copying and pasting to create new tables as needed), listing each designated portion of testimony by page and line number, any objections, and any responses. If both parties designate testimony from the same witness, the parties will fill out a single table for that witness in page order, i.e., the parties’ designations will be interspersed. The table below requires the following information: (a) proponent of testimony, (b) page and line number(s), (c) opponent’s objection (if any) and basis, (d) proponent’s response. Parties must list all bases for objections and responses (bases not included below may be waived), but they need not do more than identify the grounds and legal authority for their position.

The parties must edit the header to include the case information and date they submitted or updated the deposition designations. It must be submitted to the Court’s proposed order inbox in Microsoft Word format. The parties must also provide the transcript excerpts listed in the standing order and make the full transcripts available to the Court (preferably in the condensed transcript format where multiple deposition transcript pages are reduced to one page). *The parties may delete these instructions as they edit this document and the example text in the first table*.

[Witness Name]

| **Proponent** | **Line/Page Nos.** | **Opponent’s Objection** | **Proponent’s Response** |
| --- | --- | --- | --- |
| Plaintiff | 10:5–11:4 | N/A | N/A |
| Defendant | 16:1–16:10 | Improper lay opinion testimony about Plaintiff’s medical condition. FRE 701. | Witness is testifying about her observation of Plaintiff’s demeanor. [Case citation.] |
| Defendant | 20:3–24:5 | N/A | N/A |

[Witness Name]

| **Proponent** | **Line/Page Nos.** | **Opponent’s Objection** | **Proponent’s Response** |
| --- | --- | --- | --- |
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