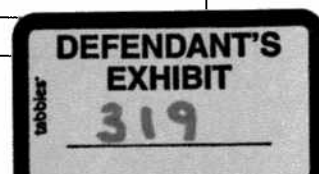


ASPCA et al. v. Feld Entertainment, Inc.
Civ. Act. No. 03-2006 (D.D.C.) (EGS/JMF)
Deposition of JAMES M. ANDACHT
Defendant's Objections and Counter Designations

Plaintiffs' Designations	Defendant's Objections / Needed for Completeness	Defendant's Counter Designations
9:07-10:01		
14:07-14:13	Objection: Incomplete. Testimony coming after portion designated by plaintiffs needed for completeness. 14:14-18.	
		40:3-41:2.
43:17-43:19	Objection: Incomplete. Testimony coming after portion designated by plaintiffs needed for completeness. 43:20-44:4.	
58:06-58:20		
72:21-75:03	Objection: Incomplete. Complete question preceding the answer is needed. 72:19-20. Question is out of context without reference to previous testimony. 59:19-61:22.	
75:06-07	Objection: Incomplete. Testimony coming after portion designated by plaintiffs needed for completeness. 75:8-14.	
75:15-75:17	Objection: Incomplete. Testimony coming before portion designated by plaintiffs needed for completeness. 75:8-14.	
76:07-76:19	Objection: Incomplete. Testimony coming after portion designated by plaintiffs needed for completeness. 76:20-77:10.	
77:21-78:14	Objection: Incomplete. Testimony coming after portion designated by plaintiffs needed for completeness. 78:15-20.	
88:10-88:16	Objection: Incomplete. Testimony coming after portion designated by plaintiffs needed for completeness. 88:17-22.	
162:16-163:10		
		169:19-172:18.
196:06-13	Objection: Irrelevant (Red Unit).	
197:02-04	Objection: Irrelevant (Red Unit).	



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197:10-13	Objection: Incomplete. Testimony coming after portion designated by plaintiffs needed for completeness. 197:14-198:11. Irrelevant (Red Unit).	
212:06-212:21	Objection: Incomplete. Testimony coming after portion designated by plaintiffs needed for completeness. 212:22-213:15. Irrelevant (Red Unit).	
213:13-213:15		
214:19-215:04		
217:10-218:19	Objection: No foundation; witness has no personal knowledge of the document. Calls for speculation. Irrelevant (Red Unit). Incomplete. Testimony coming after portion designated by plaintiffs needed for completeness. 218:20-219:1; 219:18-220:13.	
247:02-247:06		
250:11-250:15		
260:19-261:01	Objection: Incomplete. Testimony coming before portion designated by plaintiffs needed for completeness. 258:01-260:18. Irrelevant; refers to electric prod..	
Video		
90:04-94:11	Objection: Vague question. Calls for speculation. Asked and answered. Cumulative.	
94:12-98:05	Objection. Vague question. Assumes facts not in evidence.	
103:04-105:22	Objection: Vague question. Calls for speculation.	
175:01-177:02	Objection. Vague question. Assumes facts not in evidence.	
179:07-179:17	Objection: Incomplete. Testimony coming after portion designated by	

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	plaintiffs needed for completeness. 179:18-21. Irrelevant (Red Unit).	
185:02-189:08	Objection: No foundation. Witness testified that he did not remember the document. 178:13. Irrelevant (Red Unit). Calls for speculation.	
227:19-231:12	Objection: Incomplete. Testimony coming before portion designated by plaintiffs needed for completeness. 227:12-18. No foundation; witness has no personal knowledge of the document. Calls for speculation.	
237:12-244:01	Objection: Vague. No foundation; witness has no personal knowledge of the document. Calls for speculation. Incomplete. Testimony coming after portion designated by plaintiffs needed for completeness. 244:8-246:14.	
250:16-253:18	Objection: Irrelevant: refers to electric prod. No foundation; witness has no personal knowledge of the document. Incomplete. Testimony coming before portion designated by plaintiffs needed for completeness. 250:11-15. Testimony coming after portion designated by plaintiffs needed for completeness. 253:19-255:2.	
255:03-257:21	Objection: Irrelevant; refers to electric prod. Calls for speculation.	