| ***Case Name\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Case Number\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_******Deposition of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_taken \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_***  |
| --- |
| **Plaintiff Designations – BLUE****Defendant Completeness—PURPLE****Defendant Counter-Designations – RED (at end)** | **Defendant Designations – RED****Plaintiff Completeness—PURPLE****Plaintiff Counter Designations – BLUE (at end)** | **Defense Objections/Responses – RED****Plaintiff Objections/Responses – BLUE** | **Exhibits** | **Ruling** |
|  |  |  |
| PLAINTIFF DESIGNATIONS | DEFENDANT -DESIGNATIONS |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
| DEFENDANT COUNTER-DESIGNATIONS | PLAINTIFF COUNTER-DESIGNATIONS |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |
|  |  |  |  |  |

**Instructions**: One form should contain all designations for a witness. Plaintiff Designations (column 1) and Defendant Designations (column 2) will show the full deposition text that the party proposes to read in its case-in-chief. Completeness designations are proposed by the other party, under Fed. R. Civ. P. 32(a)(6), to be read with the designations. Counter–designations are read following the designations and completeness designations, similar to cross examination. This form should be provided in word processing format to the other party, who then will continue to fill in the form. The form is then returned to the proposing party for review, resolution of disputes, and further editing. The parties should confer and file a final version in PDF format using the event “Notice of Filing” and also submit a final word processing copy to the court at utdecf\_allen@utd.uscourts.gov, for ruling.

All objections which the objecting party intends to pursue should be listed, whether made at the deposition, as with objections as to form, or made newly in this form, if the objection is of a type that was reserved.