UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re	:	Chapter 11
DBMP LLC,[1]	:	Case No. 20-30080 (JCW)
Debtor.	:	

JOINT DESIGNATIONS OF DEPOSITION TESTIMONY FOR OCTOBER 21-22, 2021 HEARINGS

DBMP, LLC (the "Debtor"), the Official Committee of Asbestos Claimants (the "ACC") and Sander L. Esserman, in his capacity as the Future Claimants' Representative (the "FCR" and, together with the Debtor and the ACC, the "Parties") submit the attached designations of deposition testimony in connection with the hearings on (i) the *Debtor's Motion for Bankruptcy Rule 2004 Examination of Asbestos Trusts* (Dkt. 416), (ii) *Debtor's Motion for Order Pursuant to Bankruptcy Rule 2004 Directing Submission of Personal Injury Questionnaires by Pending Mesothelioma Claimants* (Dkt. 417), and (iii) the *Official Committee of Asbestos Personal Injury Claimants' Conditional Motion Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure for an Order Directing the Submission of Information by Debtors Defense Counsel* (Dkt. 904) (collectively, the "Discovery Motions").

The admission of any deposition testimony into evidence shall not be construed as an admission by any Party that any statement or contention contained therein is true or correct.

[1] The last four digits of the Debtor's taxpayer identification number are 8817. The Debtor's address is 20 Moores Road, Malvern, Pennsylvania 19355.

The deposition testimony identified on Exhibits A – C attached hereto is being admitted solely for purposes of the Discovery Motions and their admission for purposes of the Discovery Motions shall not constitute their admission into evidence for any other purpose.

[Signatures on Following Page]

Dated: November 2, 2021

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EXHIBIT A

DEBTOR'S DESIGNATION OF DEPOSITION TESTIMONY

DEBTOR'S DESIGNATIONS OF DEPOSITION TESTIMONY FOR TRUST DISCOVERY, PIQ, AND DCQ MOTIONS AT OCTOBER 21-22, 2021 HEARINGS

PLEASE TAKE NOTICE that DBMP LLC hereby designates the following portions of deposition testimony:

1. Deposition of Richard Winner taken on August 5, 2021:

9:21-13:12
13:23-14:15
14:19-24
17:2-18:24
19:3-13
19:16-21:11
21:15-22:1
23:7-10
23:14-17
23:21-24:4
24:7-18
24:22-23
25:1-9
26:1-27:1
27:3-5
27:8-28:7
28:10-29:15
29:18-32:17
32:22-33:17
33:20-34:24
35:3-37:7
37:10-18
37:21-38:8
38:10-40:6
40:12-42:6
42:9-43:2
43:5-12
43:15-23
44:2-24
45:22-47:11
47:15-49:20
49:23-50:5
50:20-23
51:3-15
51:18-24
52:2-53:21

54:1-24
55:8-56:7
56:10-20
56:23-57:8
57:11-16
57:20-58:20
58:23-60:13
60:16-22
61:2-17
61:20-62:10
62:15-63:2
63:5-64:5
64:9-16
64:21-66:5
66:9-14
66:17-19
67:11-14
67:21-68:24
69:4-8
69:11-16
69:19-71:9
71:13-20
71:24-72:4
72:8-73:9
73:12-74:3
74:7-20
75:5-76:1
76:4-6
76:10-77:14
77:20-78:4
78:8-79:1
79:5-11
79:15-80:19
80:22-82:2
82:6-83:9
83:15-20
83:23-84:13
84:17-85:1
85:5-11
85:15-23
86:11-16
87:4-9
87:12-88:6
88:9-89:9

2. Deposition of Jared S. Garelick taken on August 5, 2021:

10:13-19
11:9-14:11
15:1-19:9
20:19-21:2
21:10-25:1
28:5-8
28:11-29:4
29:11-30:1
30:5-7
30:9-12
30:15
30:17-21
31:7-12
31:16-32:1
32:3-17
32:20
33:1-5
33:17-34:19
36:16-38:6
38:9-18
40:4-41:4
41:7-45:8
45:11-46:5
46:7-18
47:1-48:14
48:17-49:15
49:19-50:5
50:7-12
50:16-52:10
52:13-53:7
53:11-54:1
54:5-8
54:10-11
54:15-55:10
55:15-56:7
56:10-17
56:21-57:6
57:8-11
57:14-16
58:1-3
58:6-13
58:16-20
59:2-11
60:12-61:13

61:16-64:9
65:5-13
66:1-3
66:6-10
66:14-19
67:1-9
67:13-68:6
68:8-10
68:14-69:19
70:4-71:3
71:7-72:2
72:12-74:2
74:5-21
75:4-18
75:21-76:18
77:1-3
78:7-10
78:17-79:11
79:15-80:1
80:5-13
80:17-82:1
82:3-6
82:9-87:11
87:14-88:9
88:12-18
88:21-90:14
90:17-91:6
91:10-92:5
92:9-19
93:7-94:11
94:15-95:2
95:9-96:15
96:19-98:1
98:7-14
98:19-100:3
100:7-13
100:16-101:2
101:7-102:4
106:20-21
107:6-108:4
108:8-109:2
109:7-114:20
115:3-10
115:14-116:16
116:20-117:15

117:20-118:8
118:12-119:5
119:10-15
120:11-15
120:19-122:3
125:14-20
126:2-16
126:21-127:7
129:8-11
130:18-131:18
131:21-132:19
133:1-19
134:4-136:8
136:11-14
137:6-140:1
140:14-141:6
141:9-19
142:2-19
143:1-17
143:21-144:18
146:17-150:12
150:15-152:14
153:1-10
153:15-154:6
154:16-155:6
156:3-165:11
170:9-171:16
179:10-181:11
187:15-188:4
188:14-189:9
189:13-190:4
190:8-11

3. Deposition of Dr. Charles E. Bates taken on October 29, 2020:

9:5-10
30:9-31:3
49:12-22
52:13-53:22
55:1-58:21
64:20-66:6
68:1-15
69:23-70:6
75:13-21
76:1-6
77:12-20

79:21-81:11
83:25-84:13
86:14-88:16
109:12-20
175:20-176:2
176:10-14
179:15-181:10

4. Deposition of Dr. Charles E. Bates taken on April 16, 2021:

7:11-13
8:10-13
8:17-25
119:10-122:6
122:24-123:3
123:9-125:22
126:18-23
127:6-17
130:23-132:10
136:16-139:21
143:15-145:16
146:4-11
153:24-154:15
162:3-163:22
164:4-165:17
168:3-169:17
171:19-172:8
173:1-175:14
177:8-18
179:13-21
187:5-14
187:22-200:5
202:3-203:2
204:3-14
204:23-206:6
210:2-215:24
216:13-17
216:24-217:10
219:16-220:2
220:14-221:23
228:9-230:24
242:6-243:21
244:11-245:1
247:13-249:9
251:12-252:12

5. Deposition of Dr. Charles E. Bates taken on August 27, 2021:

10:14-13:8
13:23-19:23
20:9-22:7
26:16-27:22
30:10-32:20
34:12-36:14
36:22-42:23
43:23-46:2
55:4-58:16
59:18-61:5
68:7-20
81:21-82:13
82:18-84:22
85:4-22
86:9-15
87:8-88:13
92:3-93:14
94:15-95:14
95:18-97:12
97:19-98:14
100:17-101:3
105:22-106:23
110:25-114:22
115:5-14
116:12-117:7
117:16-119:5
121:17-126:14
130:7-133:17
135:25-139:12
145:21-148:6

6. Deposition of Michael T. Starczewski taken on April 30, 2021:

11:12-13
11:16
11:20-12:2
13:11-15:21
17:25-20:8
24:22-26:12
34:8-35:10
47:22-48:16
49:12-50:18
70:16-71:7
72:8-12
72:16-74:10

74:15-75:18
78:7-80:19
81:17-20
82:18-22
83:13-84:6
85:3-87:12
87:20-25
89:24-91:16
91:24-93:20
94:5-19
94:25-95:18
97:8-99:23
100:19-102:23
107:18-108:6
108:18-109:3
139:18-24
141:14-144:2
146:6-147:11
151:17-152:16
167:13-171:9
177:24-178:10
179:19-181:8
182:9-183:15
184:5-185:13
185:20-187:7
189:10-192:15
193:10-194:11
195:6-197:8
198:20-202:9
206:7-208:3
209:6-13
210:8-212:4
254:3-255:13
258:5-9
258:18-260:10
269:24-270:20
283:18-286:9
288:5-289:24
314:25-318:10

7. Deposition of Dr. Mark Peterson taken on July 27, 2021:

11:18-12:2
12:16-20
13:13-24
15:4-16

19:10-23
20:5-14
21:19-22:12
24:1-3
24:13-25:2
25:25-26:11
34:24-35:14
36:5-37:24
38:11-39:20
40:10-41:23
42:12-15
43:2-46:3
47:6-49:15
50:2-10
50:18-22
51:3-21
54:2-56:16
67:18-68:6
69:22-70:8
77:24-79:7
80:20-81:7
83:3-85:3
85:17-88:5
88:25-91:14
92:25-94:11
94:24-95:5
96:17-98:2
100:17-102:9
102:24-104:13
109:5-18
110:11-112:1
117:6-119:25
121:15-122:7
122:24-123:4
123:22-124:25
126:8-130:2
130:12-134:10
136:21-137:2
137:17-139:8
139:13-15
139:18-142:8
144:8-16
145:9-146:12
146:16-153:20
154:23-155:1

157:3-20
158:2-159:5
160:24-162:17
162:24-166:7
166:14-167:16
168:20-171:16
171:21-175:6
177:8-12
177:18-184:5
184:12-14
184:20-188:2
189:25-190:4
190:11-192:3

8. Deposition of Dr. Mark Peterson taken on December 29, 2020 in In re Bestwall LLC, No. 17-31795 (Bankr. W.D.N.C.):

227:15-228:18

DEBTOR'S COUNTER-DESIGNATIONS OF DEPOSITION TESTIMONY FOR TRUST DISCOVERY, PIQ, AND DCQ MOTIONS AT OCTOBER 21-22, 2021 HEARINGS

PLEASE TAKE NOTICE that DBMP LLC hereby counter-designates the following portions of deposition testimony. DBMP further counter-designates the testimony from these depositions that it designated on October 15, 2021. DBMP also, as applicable, incorporates the changes made in applicable errata sheets. DBMP has not counter-designated testimony that was previously designated by another party, but reserves the right to do so if any of those designations are withdrawn.[1]

1. Deposition of Jared S. Garelick taken on August 5, 2021:

95:5-7

2. Deposition of Dr. Charles E. Bates taken on October 29, 2020:

32:10-13
141:12-142:7

3. Deposition of Dr. Charles E. Bates taken on April 16, 2021:

62:3-64:20
65:7-18
66:20-67:4
72:9-12
81:1-17
82:2-19
92:6-9
92:24-95:2
159:17-160:3
266:19-267:7
267:24-268:7
268:8-11
269:1-270:6
271:23-272:6

[1] The Official Committee of Asbestos Personal Injury Claimants (the "ACC") designated portions of the deposition of David Levi taken on April 9, 2021 in In re Imerys Talc America, Inc., Case No. 19-10289 (Bankr. D. Del.). The Debtor does not have a copy of that deposition transcript. The ACC has not yet provided a copy of this deposition transcript to the Debtor, and the Debtor accordingly reserves all rights with respect to those designations.

4. Deposition of Dr. Charles E. Bates taken on August 27, 2021:

24:20-25:18
47:18-50:17
91:15-92:2
106:24-107:6

5. Deposition of Michael T. Starczewski taken on April 30, 2021:

46:14-47:21
55:9-12
62:14-63:13
63:17-21
66:11-17
68:21-69:25
71:22-72:7
89:17-21
105:20-24
111:15-112:5
140:6-9
150:23-151:4
159:17-160:9
160:24-161:13
161:21-162:5
164:21-165:7
165:15-167:5
174:14-175:9
175:17-176:14
198:8-19
205:24-206:6
253:24-254:2
257:11-20
264:25-266:7

6. Deposition of Dr. Mark Peterson taken on July 27, 2021:

21:9-10
74:25-75:14
99:10-100:1
134:23-135:3
135:23-136:8

7. Deposition of Sean Knapp taken on September 30, 2020:

81:4-82:2

8. Deposition of Joseph Bondi taken on October 9, 2020:

190:11-13
190:16-192:18

9. Deposition of Mark A. Rayfield taken on October 29, 2020:

61:4-7
61:12-15
62:3-5
62:7-13
62:16-20
62:22-63:2
63:8-64:7
64:13-20
64:22
64:24-65:4

10. Deposition of Amiel Gross taken on June 2, 2021:[2]

50:23-51:10
51:20-54:17
60:7-61:5
67:10-18
107:11-15
107:24-108:3
108:17-109:5

11. Deposition of Dr. Charles E. Bates taken on February 3, 2011 in In re Specialty Prods. Holding Corp., Case No. 10-11780 (Bankr. D. Del.):

22:23-24:8
24:15-28:9

12. Deposition of Dr. Charles E. Bates taken on September 10, 2020 in In re Bestwall., Case No. 17-31795 (Bankr. W.D.N.C.):

151:18-152:9
233:14-234:5
234:24-237:19
242:25-245:3

[2] In response to these designations, DBMP further counter-designates the declaration of Michael T. Starczewski, dated June 16, 2021.

EXHIBIT B

ACC's DESIGNATION OF DEPOSITION TESTIMONY

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re:	:	Chapter 11
DBMP LLC,[1]	:	Case No. 20-30080 (JCW)
Debtor.	:	

OFFICIAL COMMITTEE OF ASBESTOS PERSONAL INJURY CLAIMANTS' DESIGNATIONS OF DEPOSITION TESTIMONY FOR TRUST DISCOVERY, PIQ, AND DCQ MOTIONS AT OCTOBER 21-22, 2021 HEARINGS

PLEASE TAKE NOTICE that the Official Committee of Asbestos Personal Injury Claimants (the "Committee") hereby designates the following portions of deposition testimony[2]:

1. Deposition of Michael T. Starczewski taken on April 30, 2021:

12:3-13:10
15:22-17:24
20:25-25:14
27:18-30:2
37:11-46:13
50:19-53:2
53:13-55:8
55:13-56:7
56:16-61:20
63:14-16
65:21-66:10
66:18-67:16
68:6-20
70:2-7
70:12-15

[1] The last four digits of the Debtor's taxpayer identification number are 8817. The Debtor's address is 20 Moores Road, Malvern, Pennsylvania 19355.

[2] The Committee's submission of this notice is without waiver of the right to use any and all deposition testimony, including but not limited to the testimony designated herein, for any purpose consistent with the Federal Rules of Evidence, and without waiver of any objection to the use of any testimony or exhibit that has been or may be proffered by the Debtor.

70:19-21
72:8-74:25
75:19-76:23
78:16-80:19
79:8-25
81:17-84:6
87:13-19
88:20-89:16
89:22-97:7
99:24-100:19
102:24-105:19
105:25-106:5
107:8-108:6
108:14-109:16
110:22-111:14
116:5-118:18
119:19-120:16
140:10-22
144:3-145:12
147:12-148:10
148:15-150:16
153:11-18
161:4-18
162:12-164:20
165:11-14
173:15-174:13
176:15-177:23
178:12-179:5
185:14-19
187:8-189:7
192:16-193:9
194:12-195:5
197:25-198:7
202:10-17
203:22-204:7
207:2-10
208:4-209:5
210:8-25
211:1-25
212:5-214:10

216:12-218:3
226:20-25
237:14-240:3
250:6-252:5
257:7-10
258:10-17
260:11-262:23
266:11-267:18
268:4-269:23
271:19-272:23
275:11-278:25
287:1-24
296:7-299:10
300:7-301:15
319:4-11

2. Deposition of Dr. Charles E. Bates taken on August 27, 2021:

19:24-20:8
22:8-23:8
24:6-19
25:19-26:15
28:16-29:19
32:21-34:11
50:18-55:3
66:23-67:23
69:17-73:6
79:11-15
86:16-23
88:14-91:14
95:15-17
98:15-100:16
101:4-11
102:14-104:7
107:7-109:16
114:23-115:4
126:15-129:8

3. Deposition of Dr. Charles E. Bates taken on April 16, 2021:

12:6-13:1

14:6-50:4
50:5-24
51:1-24
51:25-59:21
65:7-66:19
66:22-67:4
68:10-69:1
72:13-73:14
74:5-80:20
80:21-25
81:18-82:1
82:20-90:7
90:8-20
92:10-23
95:12-21
95:22-119:9
119:10-127:17
132:11-136:10
141:1-143:13
145:18-146:2
146:12-153:12
160:4-162:2
169:18-171:18
175:15-177:7
179:13-25
185:2-11
180:1-25
181:1-3
201:4-25
236:8-242:5
245:2-247:12
249:10-251:11
252:13-267:7
267:8-23
268:12-25
271:14-272:6

4. Deposition of Dr. Charles E. Bates taken on October 29, 2020:

13:17-14:8

16:14-17:1
19:14-20:10
20:20-22
20:24-22:1
31:4-32:9
33:4-34:23
36:8-39:1
39:3-40:8
49:23-52:12
53:23-54:25
58:19-59:2
64:9-18
66:7-67:13
68:16-69:6
70:8-71:15
72:21-73:17
76:7-77:11
77:21-79:20
81:12-83:24
84:14-86:13
88:17-89:3
109:21-111:11
131:16-132:15
176:3-9
176:15-177:22

5. Deposition of Charles E. Bates, Ph.D. taken on Feb. 3, 2011 in *In re Specialty Prods. Holding Corp.*, Case No. 10-11780 (Bankr. D. Del.):

24:9-14

6. Deposition of Dr. Mark Peterson taken on July 27, 2021:

15:17-17:22
19:24-20:3
20:15-21:8
22:13-23:25
24:4-12
25:3-24
26:13
32:10
35:16-36:3

45:8-19
46:4-47:5
49:17-25
50:11-17
51:23-54:1
56:17-58:13
68:8-69:21
70:10-74:23
75:16-76:12
79:16-80:18
88:6-23
94:12-24
95:7-10
98:3-99:9
100:3-15
102:10-22
104:14-107:16
108:17-109:4
109:19-110:10
114:3-17
115:17-117:4
120:1-121:14
123:5-21
125:1-126:6
130:3-10
135:4-22
139:16-17
142:10-144:7
144:25-145:8
146:13-15
153:21-154:21
154:18-21
155:2-156:14
157:21-25
159:8-160:14
168:10-18
175:7-176:2
177:14-17
184:6-10
184:5-19
189:14-24
192:4-14
226:21-227:13
228:19-229:10

7. Deposition of Amiel Gross taken on June 2, 2021:

47:8-24
50:13-22
106:17-107:10
107:20-23
108:8-16

8. Deposition of Mark A. Rayfield taken on October 7, 2020:

61:9-11
61:16-19

9. Deposition of Joseph Bondi taken on October 9, 2020:

42:9-13
190:5-10

10. Deposition of Sean Knapp taken on September 30, 2020:

80:20-21
81:9

11. Deposition of David Levi taken on April 9, 2021 in *In re Imerys Talc America, Inc.*, Case No. 19-10289 (Bankr. D. Del.):

42:2-10
57:14-58:17

12. Deposition of Richard R. Winner taken on August 16, 2021:

13:17-19
14:16-18
15:12-15
15:17-13:23
19:14-15
21:12-14
22:19-24
23:11-12
23:18-19
24:5-6
24:19-21
27:6-7
28:8-9

29:16-17
32:18-21
33:18-19
35:1-2
37:8-9
40:7-10
42:7-8
43:3-4
43:13-14
43:24-44:1
47:12-14
49:21-22
50:24-51:1
51:16-17
53:22-24
55:1-7
56:8-9
56:21-22
57:9-10
57:17-19
58:21-22
60:14-15
60:23-24
61:18-19
62:11-14
63:3-4
64:3-5
64:17-20
66:6-8
66:15-16
67:15-20
69:1-3
69:9-10
69:17-18
71:10-12
71:21-23
72:5-7
73:10-11
74:4-6
74:21-75:4
76:2
76:7-9
77:15-19
78:6-7
79:2-4

79:12-14
80:20-21
82:3-5
83:11-14
83:21-22
84:14-16
85:2-4
85:12-14
87:10-11
88:7-8
89:10-91:2

13. Deposition of Jared S. Garelick, taken August 5, 2021.

19:10-20:13
21:3-4
25:2-28:4
28:9-10
30:2-4
30:8
30:13-14
30:16
31:1-6
31:13-15
32:2
32:18-19
33:16
36:15
38:7-8
39:12-40:3
41:5-6
45:9-10
46:19-21
48:15-16
49:16-18
50:6
50:13-15
52:11-12
53:8-10
54:2-4
54:9

54:12-14
55:11-14
56:8-9
56:18-20
57:1
57:12-13
58:4-5
58:14-15
58:21-59:1
61:14-15
65:14-21
66:4-5
66:11-13
66:20-21
67:10-12
68:7
68:11-13
69:20-70:3
71:4-6
74:3-4
75:1-3
75:19-20
76:19-21
78:12-13
78:16
79:12-14
80:2-4
80:14-16
82:7-8
87:12-13
88:10-11
88:19-20
90:15-16
91:7-9
92:6-8
92:20-93:6
94:12-14
95:3-4
96:16-18
98:2-6

98:15-18
100:4-6
100:14-15
101:3-6
102:5-106:19
107:1-5
108:5-7
109:3-6
115:1-2
115:11-13
116:17-19
117:16-19
118:9-11
119:6-8
120:16-18
125:21-126:1
126:17-20
131:19-20
132:20-21
133:20-134:3
136:9-10
141:7-8
141:20-142:1
142:20-21
143:18-20
150:13-14
152:15-21
153:11-14
154:7-15
165:12-166:17
172:16-177:8
179:3-185:6
185:10-13
185:16-21
186:2-7
186:10-19
188:5-13
189:10-12
190:5-7

/s/ Davis Lee Wright

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Counsel to the Official Committee of Asbestos Personal Injury Claimants

Dated: October 18, 2021

EXHIBIT C

FCR's DESIGNATION OF DEPOSITION TESTIMONY

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In re: DBMP LLC,[1] Debtor.	Chapter 11 Case No. 20-30080 (JCW)

FUTURE CLAIMANTS' REPRESENTATIVE'S
CROSS AND COUNTER DESIGNATIONS OF DEPOSITION
TESTIMONY FOR OCTOBER 21-22, 2021 HEARINGS

PLEASE TAKE NOTICE that the Future Claimants' Representative hereby designates the following portions of deposition testimony[2]:

1. Deposition of Michael T. Starczewski on April 30, 2021

50:19-23
51:3-25
55:13-56:7
57:3-13
63:14-16
65:24-66:10
66:18-67:16
72:13-15
81:21-82:17
82:23-83:12
87:13-19
89:22-23
91:17-23
93:21-94:4
94:20-24
95:19-96:25
99:24-100:11

[1] The last four digits of the Debtor's taxpayer identification number are 8817. The Debtor's address is 20 Moores Road, Malvern, Pennsylvania 19355.

[2] The Future Claimants' Representative's submission of this notice is without waiver of the right to use any and all deposition testimony, including but not limited to the testimony designated herein, for any purpose consistent with the Federal Rules of Evidence, and without waiver of any objection to the use of any testimony or exhibit that has been or may be proffered by the Debtor.

103:6-104:23
108:12-17
109:4-16
140:10-19
178:17-179:18
185:14-19
194:12-195:5
209:14-210:7
212:5-213:10
216:12-218:3
250:20-251:20
252:17-253:23
255:14-18
307:14-24
318:11-16

2. Deposition of Charles E. Bates, PhD on October 29, 2020

31:4-35:9
49:23-52:12
53:23-54:25
58:22-64:19
66:7-67:25
68:16-69:22
70:7-75:12
75:22-25
76:7-77:11
77:21-79:20
81:12-83:24
84:14-86:13
88:17-89:3
109:21-23
142:14-159:1
175:12-19
176:3-9
176:15-179:14

3. Deposition of Charles E. Bates, PhD on April 16, 2021

8:14-16
11:25-13:1
14:6-24:16
27:24-30:13
36:7-14
38:24-59:21

60:9-114:11
114:18-119:6
122:7-23
123:4-8
125:23-126:17
126:24-127:5
128:7-130:22
132:11-136:15
139:22-143:13
145:18-146:2
146:12-147:19
149:8-153:12
159:17-162:2
165:18-167:6
167:9-168:2
169:18-171:18
172:9-25
175:15-177:7
179:22-183:14
184:4-184:18
185:2-186:3
201:4-25
220:3-13
236:8-242:5
245:2-247:12
252:15
253:5-21
255:24-257:5
262:14-263:2
263:11-279:3
280:13-284:15

4. Deposition of Charles E. Bates, PhD on August 27, 2021

19:24-20:8
22:8-23:13
24:7-26:15
28:9-30:9
32:21-34:11
42:24-43:10
46:3-55:3
58:17-59:17
63:21-68:6
69:17-73:6
82:14-17

84:23-85:3
85:23-86:8
86:16-87:7
88:14-92:2
95:15-17
97:13-18
98:15-100:16
101:4-105:21
106:24-109:16
110:8-110:24
114:23-115:4
115:15-116:11
117:8-15
119:17-121:16
126:15-129:8
129:16-130:6
133:18-135:24
139:13-144:5
148:11-21

Dated: October 18, 2021

Respectfully submitted,

/s/ Felton Parrish

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