

In the Supreme Court of Nevada

UNITED HEALTHCARE INSURANCE COMPANY, UNITED HEALTH
CARE SERVICES, INC., UMR, INC., SIERRA HEALTH AND LIFE
INSURANCE COMPANY, INC., HEALTH PLAN OF NEVADA, INC.,
Petitioners

vs.

THE EIGHTH JUDICIAL DISTRICT COURT OF THE State of
Nevada, in and for the County of Clark, and THE HONORABLE
NANCY L. ALLF, District Judge,
Respondents,

and

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., TEAM
PHYSICIANS OF NEVADA-MANDAVIA, P.C., CRUM STEFANKO
AND JONES, LTD.,
Real Parties in Interest.

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Elizabeth A. Brown
Clerk of Supreme Court

**Real Parties in Interest's Opposition to Petitioners' NRAP 27(e) Emergency
Motion to Stay Enforcement of Subpoenas Pending Petition and to Motion for
Interim Stay**

District Court Case No. A-19-792978

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Attorneys for Real Parties in Interest
NRAP 26.1 Disclosure

The undersigned counsel of record certifies that the following are persons and entities as described in NRAP 26.1(a). These representations are made in order that the justices of this court may evaluate possible disqualification or recusal.

The following Real Parties in Interest (plaintiffs below) are referred to as the “Health Care Providers” where necessary and appropriate in this response and have been represented by the law firms of McDonald Carano LLP, Lash & Goldberg LLP and Ahmad, Zavitsanos, Anaipakos, Alavi & Mensing, P.C.:

1. Fremont Emergency Services (Mandavia), Ltd.;
2. Team Physicians of Nevada-Mandavia, P.C.; and
3. Crum, Stefanko and Jones, Ltd. dba Ruby Crest Emergency Medicine.

No Health Care Provider is owned by a parent corporation and no Health Care Provider has 10% or more of its stock owned by a publicly held company.

[Continued on next page.]

DATED this 21st day of October, 2021.

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Response to NRAP 27(e) Certificate

Petitioners (collectively, “United”) have failed to meet the timeliness requirement of NRAP 27(e). The trial subpoenas at issue were served September 9. United waited to file the motion to quash (the subject of its writ petition) until October 4. The district court denied the motion on October 6. 5 Pet. App. 234–247. During that hearing, United asked the district court if it would entertain an oral motion to stay. *Id.* at 200:15–201:3. The district court instructed United to file its stay motion in writing. *Id.* Although this case is set for trial on October 25, United waited **nine more days**, until October 15, to file its stay motion in the district court. 1 Stay App. 1–16. United strategically waited until the last possible moment to bring its motions to stay, knowing full well that granting any form of stay effectively secures the object of United’s writ petition, which is to deny the Health Care Providers’ opportunity to call the witnesses-at-issue during their case-in-chief.

Although United suggests that it was waiting for the district court to issue a written motion denying the motion to quash, see United’s NRAP 27(e) Certificate at iii, United was well aware of its ability to immediately seek a stay in the district court and before this court. *Quinn v. Eighth Jud. Dist. Ct.*, Supreme Court Case No. 74519, Petition for Writ of Prohibition, filed Nov. 21, 2017, fn. 3 (“The district court has not yet entered a [written] order on its ruling compelling the attorney depositions; however, Ms. Sinatra’s counsel has submitted a written order to the

district court.”). For this reason alone, United’s motions should be summarily denied. *See* NRAP 27(e)(1).

Introduction

United’s motions are nothing more than a trial tactic. United is objecting to the Health Care Providers having the opportunity to call these key witnesses—all of whom United controls—in plaintiffs’ case-in-chief. *See* Pet at 3 n.5 (“Defendants are not arguing that they have no control or influence over the Out Of State Witnesses”); 2 Pet. App. 171–75. Instead, United wants the jury to first hear those witnesses during the defense case-in-chief. This is not serious or irreparable harm to United. If this court grants either of United’s requested stays, the court will also necessarily be granting the ultimate relief United requests in its writ petition: preventing the Health Care Providers from opening the trial with a live cross-examination of United’s witnesses.

United cannot meet any of the factors considered for granting a stay. *See* NRAP 8(c); *Hansen v. Eighth Jud. Dist. Ct.*, 116 Nev. 650, 6 P.3d 982 (2000). First, to the extent the object of the petition and stay is to save the witnesses the trouble of coming to trial, that will happen anyway because United intends to call them during its case-in-chief. Second, United has not even bothered to argue that **United** (the relevant party under NRAP 8(c)(2)), as opposed to the witnesses, will suffer any harm or inconvenience if the stay is not granted. Third, the Health Care Providers

will be harmed by a stay, because they will have been prevented from controlling the presentation of their own case. And fourth, the district court acted within its considerable discretion resolving factual disputes against United when it denied United's motion to quash. This court should deny stay relief.

Procedural History

NRCP 16.1 requires parties to disclose witnesses with knowledge of the litigation, including their addresses, and to update those disclosures as needed. NRCP 16.1(a)(1)(A)(i). These disclosures enable the opposing party to seek discovery from witnesses, including addresses for issuance of subpoenas. All ten witnesses-at-issue have been United employees during the litigation (and so United presumably knows their addresses), United instead directed them to be contacted care of United's own Nevada lawyers. 2 Pet. App. 100–03, 124–33. When the Health Care Providers contacted United's lawyers about accepting deposition subpoenas for these witnesses, United's counsel indicated they believed subpoenas were only required for witnesses not affiliated with a party. 2 Pet. App. 113–20.

The at-issue witnesses, some of whom served as corporate representatives under NRCP 30(b)(6), gave evasive and incomplete testimony regarding key issues in this litigation. See 2 Pet. App. 94; 6 Pet. App. 336–361. Through 17 separate NRCP 16.1 disclosures, United represented these witnesses could be found care of its Nevada counsel. United, in its writ petition, concedes it has control over these

witnesses.

Yet on the eve of trial—and *after* the Health Care Providers served subpoenas care of the attorneys, as indicated in United’s disclosures—United reversed course. It updated its disclosures to remove the indication that the witnesses could be reached through its counsel and indicated for the first time that four of the witnesses were no longer United employees. 2 Pet. App. 145–66. United’s revised disclosures also provided the witnesses’ home addresses for the first time. NRCP 16.1; Pet. App. 147–50. United’s pretrial disclosures made pursuant to NRCP 16.1(a)(1)(F)(3) indicate these witnesses will be trial witnesses for United.

Argument

This court evaluates four factors when deciding whether to issue a stay:

- (1) Whether the object of the writ petition will be defeated if the stay is denied;
- (2) Whether petitioner will suffer irreparable or serious injury if the stay is denied;
- (3) Whether real party in interest will suffer irreparable or serious injury if the stay is granted; and
- (4) Whether petitioner is likely to prevail on the merits in the appeal or writ petition.

NRAP 8(c); *Hansen*, 116 Nev. at 657. None of these factors weighs in favor of granting a stay.

A. The stay will not prevent the witnesses from having to travel to Nevada because United intends to call them in its own case-in-chief.

United claims to seek to protect the subpoenaed witnesses from the trouble of

having to travel to Nevada to testify. However, United itself plans to call some or all of these witnesses in trial itself. How do we know this?

- United identified all the witnesses on its trial disclosures as witnesses United would likely or may call. *See* 2 Pet. App. 169–75.
- While the Health Care Providers confronted United with this fact before the district court, **United has never denied that it intends to call these witnesses** during its own case. *See* 3 Stay App. 42:22–43:3.
- United suggested that it might have placed the witnesses on its trial disclosures to preserve the option to call the witnesses via deposition, but this claim is belied by the fact that United failed to provide deposition designations for *any* of the ten subpoenaed witnesses. *See* 3 Pet. App. 198:5–17; 2 RPA 1–51 (deposition designations served October 4, 2021 including **none** of the subpoenaed witnesses at issue). Because United has failed to provide deposition designations in its disclosures, if it presents these witnesses—as it has told the Health Care Providers and the court that it intends to do—it **must** call them live.
- **None of the witnesses has intervened or requested relief on their own behalf.** Only United has requested relief from these subpoenas.

Because United plans to call some or all of these witnesses in its own case, a stay will not protect the witnesses from any burden or inconvenience. This factor weighs against granting a stay.

B. United does not even bother to allege or argue that it will suffer irreparable or serious injury if the stay is denied.

Although the proper second factor is “whether **appellant/petitioner** will suffer irreparable or serious injury if the stay is denied,” **United** is the petitioner here, not the witnesses. *See* NRAP 8(c) (emphasis added); *Hansen*, 116 Nev. at 657. United claims no injury. United only claims that the **witnesses** may suffer

inconvenience if the stay were denied. Inconvenience is not irreparable injury. *Id.*

It is telling that the witnesses have not sought relief from the subpoenas or the order denying the motion to quash, although they could have done so. *See Quinn v. Eighth Jud. Dist. Court*, 134 Nev. 25, 410 P.3d 984 (2018) (petition brought by non-party witnesses). Make no mistake, these motions are not intended to protect the witnesses from any harm or inconvenience. They are to enable United to exploit its own misdirection and control the Health Care Providers' presentation of their case-in-chief. This factor weighs against granting a stay.

C. The Health Care Providers will suffer irreparable harm if the stay is denied.

The subpoenaed witnesses, including at least one witness who testified as United's representative under NRCP 30(b)(6), are central to the Health Care Providers' case-in-chief. Pet. App. at 94; *id.* at 336–46. Yet many of them were evasive in depositions. *See* 2 Pet. App. 94; 6 App. 336–361. Not only is calling witnesses via deposition notoriously less engaging and less effective than calling them live, but without the ability to bring these witnesses during its case-in-chief, the Health Care Providers will be limited to an incomplete record. This is particularly unfair because—as the district court explicitly found in its order denying United's motion to quash, 5 Pet. App. 200:4–10—the Health Care Providers relied on United's disclosures and representations to understand that these witnesses would be available through United's counsel. This factor weighs against granting a stay.

D. United is not likely to prevail on the merits because the district court properly found that United should not be rewarded for its misconduct.

Under NRCP 16.1, United was required to disclose “the name and, if known, the address and telephone number of each individual likely to have information discoverable under Rule 26(b)” NRCP 16.1(a)(1)(A). United also had an ongoing duty to “timely supplement to correct the discourse or response to include information thereafter acquired” if United learned its disclosure was incomplete or incorrect.” NRCP 26(e)(1). This court has recognized the importance of complying with these rules, observing that they “aid in the efficient and fair administration of justice.” *See Mays v. Eighth Judicial District Court*, 105 Nev. 60, 62, 768 P.2d 877, 878 (1989) (issuing writ of mandamus when district court improperly waived compliance with NRCP 16.1).

The district court found that the Health Care Providers relied on these representations of United’s pretrial disclosures that such witnesses were available in Nevada, care of its Counsel. 3 Pet. App. 200:4–10. If the Health Care Providers had known that United would change its position regarding accepting subpoenas, they could have sought other relief. The district court determined that United could not seek relief from a situation of its own making.¹ *See also* NRS 50.115(1) (district

¹ United’s actions in leading the Health Care Providers to believe its attorneys would accept subpoenas for these witnesses distinguish this case from the *Consolidated Generator-Nevada* case. *See Consolidated Generator-Nevada, Inc. v. Cummins Engine Co.*, 114 Nev. 1304, 971 P.2d 1251 (1998). The court’s one-

court exerts reasonable control over the mode and order of presenting witnesses).

Importantly, *United*, not the witnesses, is the party seeking relief here. And because United's actions misled the Health Care Providers to their detriment, the principles of equitable estoppel militate against United being rewarded for its actions. "Equitable estoppel functions to prevent the assertion of legal rights that in equity and good conscience should not be available due to a party's conduct." *In re Harrison Living Trust*, 121 Nev. 217, 223, 112 P.3d 1058, 1061–62 (2005) (quoting *Topaz Mutual Co. v. Marsh*, 108 Nev. 845, 853, 839 P.2d 606, 611 (1992)). The elements of equitable estoppel are:

1. The party to be estopped must be apprised of the true facts;
2. The party must intend that its conduct shall be acted upon, or must so act that the party asserting estoppel has the right to believe it was so intended;
3. The party asserting the estoppel must be ignorant of the true state of facts; and
4. He must have relied to his detriment on the conduct of the party to be estopped.

Id. All of those factors are met here. The district court acted well within its discretion to refuse United's request.

This court's decision in *Quinn* does not compel a different result. *Quinn*

sentence analysis on the issue did not address either of those circumstances. *Id.* at 1312.

involved deposition subpoenas issued to non-party witnesses who resided in California. *Quinn*, 134 Nev. at 26–27. The party seeking discovery, Kimmarie Sinatra, first caused the subpoenas to be issued in California, and the witnesses moved to quash them in that state. The California court exercised jurisdiction and granted the motion to quash. *Id.* at 27. Sinatra then filed a motion to compel the depositions in a Nevada court, and the Nevada court granted the motion. *Id.* at 27–28. On petition for writ of mandamus, this court decried the exercise by a Nevada court of jurisdiction when a California court had already done so and ruled on the merits. *Id.* at 31. As part of that analysis, this court noted that NRCP 45(b)(2) restricts the service of subpoenas only within the state of Nevada. *Id.* at 29.

Critically, however, *Quinn* addressed deposition subpoenas, not trial subpoenas. That is important, because the language this court relied on in *Quinn* expressly states that it is “[s]ubject to the provisions of Rule 45(c)(3)(A)(ii).” NRCP 45(b)(2). But NRCP 45(c)(3)(A)(ii), the 100-mile rule, **explicitly carves trial subpoenas out from its reach**, demonstrating the Nevada Legislature’s intent to make subpoenas more readily available for trial than for deposition. NRCP 45(c)(3)(A)(ii) (a subpoena must be quashed if it requires a person to travel more than 100 miles from the place where the person resides, is employed, or transacts business in person, “unless the person is commanded to attend trial within Nevada”).

Moreover, these subpoenas **were** served in Nevada, and as discussed above, the district court correctly determined that United should not be granted relief from the situation it created with its own actions. Unlike in *Quinn*, there is no case of competing jurisdiction. And also unlike in *Quinn*, here the witnesses are under control by a corporate party, who after all, can only speak through its employees. See NRS 51.03. Moreover, there is every indication that United—who admits that it controls these witnesses, Pet. at 3 n.5—plans to call them to testify in its own case. The district court’s decision was correct. This factor, too, weighs against a stay.

Conclusion

United has fallen fall short of establishing the need for this court’s intervention in a trial that is set to begin in less than a week. Because United cannot meet any of the factors that govern this court’s issuance of a stay, the Health Care Providers respectfully request that the court deny United’s motions.

DATED this 21st day of October, 2021.

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Certificate of Service

In accordance with NRAP 25, I hereby certify that on October 21, 2021, I caused a copy of **Real Parties in Interest's Opposition to Petitioners' NRAP 27(e) Emergency Motion to Stay Enforcement of Subpoenas Pending Petition and to Motion for Interim Stay** to be electronically filed and served with the Clerk of the court for the Nevada Supreme Court by using the Nevada Supreme Court's E-Filing system (Eflex) and served via this court's electronic filing system to all parties listed on the e-service master list, namely:

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In addition, a courtesy copy of the **Real Parties in Interest's Opposition to Petitioners' NRAP 27(e) Emergency Motion to Stay Enforcement of Subpoenas Pending Petition and to Motion for Interim Stay** will be sent via U.S. Mail with postage prepaid on October 22, 2021 to the following:

The Honorable Judge Nancy L. Allf
Eighth Judicial District Court
Department No. 27
Regional Justice Center
200 Lewis Ave.,
Las Vegas, Nevada 89155

/s/ Marianne Carter
Marianne Carter

Case No. 83629

In the Supreme Court of Nevada

UNITED HEALTHCARE INSURANCE COMPANY, UNITED HEALTH
CARE SERVICES, INC., UMR, INC., SIERRA HEALTH AND LIFE
INSURANCE COMPANY, INC., HEALTH PLAN OF NEVADA, INC.,
Petitioners

vs.

THE EIGHTH JUDICIAL DISTRICT COURT OF THE State of
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NANCY L. ALLF, District Judge,
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and

FREMONT EMERGENCY SERVICES (MANDAVIA), LTD., TEAM
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AND JONES, LTD.,
Real Parties in Interest.

**Real Parties in Interest Appendix in Support of Opposition to Petitioners'
NRAP 27(e) Emergency Motion to Stay Enforcement of Subpoenas Pending
Petition and to Motion for Interim Stay**

District Court Case No. A-19-792978

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**INDEX TO REAL PARTIES IN INTEREST APPENDIX IN SUPPORT OF
OPPOSITION TO PETITIONERS' NRAP 27(E) EMERGENCY MOTION
TO STAY ENFORCEMENT OF SUBPOENAS PENDING PETITION AND
TO MOTION FOR INTERIM STAY**

DATE	DOCUMENT	PAGE RANGE	
10/4/2021	Notice of Service of Defendants' Designations of Depositions to Present at Trial	RPA 001	RPA 051

AFFIRMATION

Pursuant to NRS 239B.030, the undersigned does hereby affirm that **REAL PARTIES IN INTEREST APPENDIX IN SUPPORT OF OPPOSITION TO PETITIONERS' NRAP 27(E) EMERGENCY MOTION TO STAY ENFORCEMENT OF SUBPOENAS PENDING PETITION AND TO MOTION FOR INTERIM STAY** does not contain the social security number of any person.

DATED this 21st day of October, 2021.

McDONALD CARANO LLP

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CERTIFICATE OF SERVICE

Pursuant to NRAP 25, I certify that I am an employee of McDonald Carano LLP and that on the 21st day of October, 2021, a true and correct copy of the foregoing **REAL PARTIES IN INTEREST APPENDIX IN SUPPORT OF OPPOSITION TO PETITIONERS' NRAP 27(E) EMERGENCY MOTION TO STAY ENFORCEMENT OF SUBPOENAS PENDING PETITION AND TO MOTION FOR INTERIM STAY** was electronically filed with the Clerk of the court for the Nevada Supreme Court by using the Nevada Supreme Court's E-Filing system (Eflex) and served via this court's electronic filing system to all parties listed on the e-service master list, namely:

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In addition, a courtesy copy of the **REAL PARTIES IN INTEREST APPENDIX IN SUPPORT OF ANSWER TO PETITION FOR WRIT OF PROHIBITION, OR, ALTERNATIVELY, MANDAMUS** will be sent via U.S.

Mail with postage prepaid on October 22, 2021 to the following:

The Honorable Judge Nancy L. Allf
Eighth Judicial District Court
Department No. 27
Regional Justice Center
200 Lewis Ave.,
Las Vegas, Nevada 89155

/s/ Marianne Carter

Marianne Carter



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DISTRICT COURT

CLARK COUNTY, NEVADA

FREMONT EMERGENCY SERVICES
(MANDAVIA), LTD., a Nevada professional
corporation; TEAM PHYSICIANS OF
NEVADA-MANDAVIA, P.C., a Nevada
professional corporation; CRUM, STEFANKO
AND JONES, LTD. dba RUBY CREST
EMERGENCY MEDICINE, a Nevada
professional corporation,

Plaintiffs,

vs.

Case No.: A-19-792978-B
Dept. No.: 27

**NOTICE OF SERVICE OF
DEFENDANTS' DESIGNATIONS OF
DEPOSITIONS TO PRESENT AT
TRIAL**



1 UNITEDHEALTH GROUP, INC., a Delaware
2 corporation; UNITED HEALTHCARE
3 INSURANCE COMPANY, a Connecticut
4 corporation; UNITED HEALTH CARE
5 SERVICES INC., dba UNITEDHEALTHCARE,
6 a Minnesota corporation; UMR, INC., dba
7 UNITED MEDICAL RESOURCES, a Delaware
8 corporation; OXFORD HEALTH PLANS, INC., a
9 Delaware corporation; SIERRA HEALTH AND
10 LIFE INSURANCE COMPANY, INC., a Nevada
11 corporation; SIERRA HEALTH-CARE
12 OPTIONS, INC., a Nevada corporation; HEALTH
13 PLAN OF NEVADA, INC., a Nevada
14 corporation; DOES 1-10; ROE ENTITIES 11-20,

Defendants.

10 COME NOW Defendants UnitedHealth Group, Inc., UnitedHealthcare Insurance
11 Company (“UHIC”), United HealthCare Services, Inc. (“UHS”), UMR, Inc. (“UMR”), Oxford
12 Health Plans, Inc. (“Oxford”), Sierra Health and Life Insurance Co., Inc. (“SHL”), Sierra Health-
13 Care Options, Inc. (“SHO”), and Health Plan of Nevada, Inc. (“HPN”) (collectively
14 “Defendants”), by and through their attorneys of the law firm of Weinberg Wheeler Hudgins
15 Gunn & Dial, LLC, and hereby provide notice that Defendants’ designations of depositions to be
16 presented at trial were transmitted to Plaintiffs on this date via electronic mail.

17 Dated this 4th day of October, 2021.

18 /s/ Brittany M. Llewellyn

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CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of October, 2021, a true and correct copy of the foregoing **NOTICE OF SERVICE OF DEFENDANTS' DESIGNATIONS OF DEPOSITIONS TO PRESENT AT TRIAL** was electronically filed/served on counsel through the Court's electronic service system pursuant to Administrative Order 14-2 and N.E.F.C.R. 9, via the electronic mail addresses noted below, unless service by another method is stated or noted:

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Defendants' Deposition Designations
Joe Carman Rule 30(b)(1), April 29, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
5	4		5	6
5	15		5	17
24	7		25	25
29	9		29	13
42	11		42	25
44	9		44	13
52	9		52	13
52	16		52	19
67	7		67	11
67	13		67	18
67	20		67	21
80	10		81	22
81	24		82	1
85	19		85	22
85	24		86	21
90	14		91	6
91	8		91	25
92	2		92	18
94	4		96	20
98	25		100	20
100	22		101	13
101	15		101	15
103	11		104	4
104	24		105	7
106	14		106	18
106	20		107	9
113	11		113	15
113	17		115	12
122	19		123	2
123	4		123	13
123	15		123	16
130	18		130	23

Defendants' Deposition Designations
Joe Carman Rule 30(b)(1), April 29, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
130	25		130	25
133	16		134	7
134	9		135	25
136	3		136	11
136	13		137	5
137	7		137	7
139	4		139	7
139	9		139	11
139	13		139	15
140	20		141	19
141	22		142	1
142	4		142	22
143	2		143	14
143	16		144	16
144	18		145	17
145	19		145	21
151	19		151	24
152	3		152	3
152	5		152	17
155	7		155	19
163	23		164	5
164	7		164	20
164	22		166	5
166	7		167	9
173	4		174	25
182	12		183	21
191	24		192	13
203	23		204	1
204	3		204	12
204	14		204	15

Defendants' Deposition Designations
Brent Davis 30(b)(1), May 26, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
5	24		6	2
6	10		6	12
24	13		24	20
25	9		25	10
38	21		40	4
41	2		41	11
43	12		43	21
44	9		44	14

Defendants' Deposition Designations
Kent Bristow 30(b)(1), May 7, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
7	8		7	15
7	25		8	9
10	9		10	20
17	4		17	11
18	17		18	25
19	10		20	6
20	8		20	20
20	22		20	22
21	3		23	16
24	22		26	3
26	6		26	25
27	2		27	8
28	22		29	3
33	10		33	15
34	12		34	23
36	18		37	20
37	22		37	22
44	21		45	2
45	8		45	21
45	25		45	25
46	13		46	24
47	1		47	12
47	14		47	19
48	5		48	10
48	16		49	9
49	21		49	24
50	2		50	8
51	14		51	25
52	3		52	7
52	10		53	2
54	5		54	6
54	8		54	8
55	9		55	17
56	20		57	4
58	14		58	25
59	7		59	12

Defendants' Deposition Designations

Kent Bristow 30(b)(1), May 7, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
59	23		60	4
60	6		60	8
63	19		64	5
68	22		81	4
81	10		81	22
81	24		81	24
82	14		84	20
84	23		87	4
87	6		87	20
87	23		88	11
88	14		89	22
89	24		90	10
90	12		90	21
91	1		91	13
91	19		91	22
91	24		92	5
92	20		94	18
94	20		95	10
95	16		95	19
95	21		95	23
96	1		96	16
96	18		97	5
97	10		97	20
97	22		99	17
99	19		100	1
100	3		100	24
101	1		103	2
103	4		103	23
103	25		104	18
104	20		104	25
105	18		106	11
106	19		107	2
108	20		109	14
109	16		110	21
111	2		111	6
111	8		113	15

Defendants' Deposition Designations

Kent Bristow 30(b)(1), May 7, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
113	17		114	1
114	15		116	11
116	22		116	25
117	2		117	15
117	19		119	4
119	6		119	14
123	11		124	20
125	2		125	19
126	3		127	19
128	23		129	16
129	18		130	1
130	3		130	24
131	2		134	10
134	12		134	15
134	18		134	19
134	21		134	24
135	2		135	8
136	24		138	7
138	11		140	11
140	14		141	9
141	11		142	1
142	4		142	7
142	12		143	17
143	19		144	19
144	21		145	5
145	7		145	14
146	25		147	12
147	21		148	5
148	17		148	25
149	2		150	15
150	18		151	2
151	4		151	14
151	16		151	22
152	8		152	16
152	18		152	21
152	23		153	11

Defendants' Deposition Designations

Kent Bristow 30(b)(1), May 7, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
153	13		153	17
153	19		153	19
155	11		155	14
155	16		155	21
157	7		157	18
157	20		158	20
158	22		159	10
159	12		159	19
159	21		159	21
161	2		161	6
161	11		162	16
164	13		165	8
165	17		170	11
170	13		173	1
173	24		174	4
174	6		174	11
174	13		174	22
173	24		175	4
175	6		175	12
175	14		176	2
176	4		176	15
176	17		176	22
177	15		177	25
178	2		178	16
178	18		179	10
179	16		179	23
179	25		179	25
180	5		182	7
190	8		190	11
205	20		206	19
207	4		207	13
207	19		207	25
208	2		208	10
208	12		208	25
209	2		209	17
209	19		209	23

Defendants' Deposition Designations

Kent Bristow 30(b)(1), May 7, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
210	1		210	11
210	13		211	5
211	7		211	15
211	17		212	1
212	3		212	14
212	17		212	20
212	22		213	11
213	13		213	18
213	20		213	20
213	24		213	24
215	2		218	22
218	24		219	10
219	12		219	25
220	12		220	17
220	21		222	10
222	12		222	20
222	22		222	24
223	4		223	7
223	9		223	16
223	18		223	19
224	13		224	16
224	19		225	2
225	4		225	19
225	21		226	4
226	6		226	15
226	17		226	18
226	25		227	18
227	25		228	25
229	2		229	25
230	2		233	6
233	10		233	19
234	5		234	21
234	24		236	7
236	12		242	3
243	8		246	18
246	20		247	12

Defendants' Deposition Designations

Kent Bristow 30(b)(1), May 7, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
249	14		250	1
250	6		250	23
251	3		251	8
251	10		256	5
256	12		257	5
257	7		257	25
258	2		258	7
258	9		258	17
259	16		269	7
269	14		269	19
269	23		271	7
271	11		271	16
271	24		272	1
272	3		272	5
272	15		274	6
274	12		275	24
276	4		277	22
277	24		278	13
278	18		278	25
279	2		279	3
279	22		280	10
280	14		283	15
283	25		284	5
284	14		284	19
284	21		284	22
285	14		285	21
286	4		286	16
286	20		287	10
287	18		288	24
289	2		289	5
289	9		293	11
293	13		294	15
294	22		295	2
295	4		295	23
295	25		296	22
297	4		300	18

Defendants' Deposition Designations
Kent Bristow 30(b)(1), May 7, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
300	21		301	5
301	23		304	9
304	14		307	22
307	24		308	5
308	7		310	14
310	16		310	25
311	5		311	18
312	17		317	1
317	6		318	22
318	24		320	10
320	14		321	9
321	13		322	15
322	19		323	13
323	15		323	16
323	23		324	2
324	5		324	18
324	21		324	23
324	25		325	9
325	11		325	16
325	18		326	10
326	25		328	8
328	11		328	21
329	1		330	4
330	6		330	14
330	25		331	5
331	7		332	10
337	5		337	15
337	17		338	11
338	13		339	6
339	9		339	15
339	18		339	21
339	23		340	4
340	6		340	16
341	1		342	13
342	15		343	13
343	15		343	23

Defendants' Deposition Designations
Kent Bristow 30(b)(1), May 7, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
344	3		344	15
344	18		344	18
344	20		345	11
345	14		345	23
346	5		346	9
346	18		347	3
347	5		347	11
347	13		349	4
349	10		350	18
350	23		350	25
351	12		353	24
354	2		354	12
354	14		355	3

Defendants' Deposition Designations
Daniel Jones 30(b)(1), May 20, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
4	23		5	8
15	10		15	20
16	7		16	14
17	6		17	11
39	19		40	11
40	20		41	4
41	8		41	13
41	17		41	21
41	25		42	6
42	20		43	1
43	6		43	12
43	18		43	20
59	4		59	17
61	15		61	21
61	25		62	1

Defendants' Deposition Designations
David Greenberg 30(b)(1), May 27, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
5	20		6	14
19	12		33	4
34	1		39	21
40	10		41	2
42	22		47	11
47	23		49	14
50	10		52	2
53	12		54	4
54	10		56	8
56	15		57	15
58	15		59	3
62	3		64	16
64	23		66	1
68	22		69	5
70	8		71	5
71	8		71	17
73	21		74	7
85	8		86	15
86	23		88	14
91	6		91	12
94	12		95	9
95	17		97	22
98	20		99	3
99	20		100	4
100	6		101	11
107	21		107	24
108	20		109	8
124	22		125	3
126	10		126	25
131	4		131	14
134	15		134	25
135	8		136	17
142	1		143	25
144	1		144	8
153	13		155	25
156	16		157	13

Defendants' Deposition Designations
David Greenberg 30(b)(1), May 27, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
157	14		163	23
164	17		167	6
167	7		172	1
172	9		175	25
176	6		180	25
182	7		191	22
193	16		195	2
195	13		197	1
219	11		219	16

Defendants' Deposition Designations
Eddie Ocasio Rule 30(b)(1), May 25, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
5	6		5	8
12	2		12	15
44	11		50	15
53	24		56	19
68	1		70	25
72	24		75	16
75	21		96	7
99	13		100	18
103	24		108	16
109	4		126	22
150	13		152	6

Defendants' Deposition Designations
Kent Bristow (Fremont) 30(b)(6), May 28, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
11	1		11	2
11	20		11	25
21	10		21	25
23	12		24	22
24	24		27	11
27	17		29	10
30	5		30	21
31	3		31	16
31	18		32	8
32	10		33	6
33	8		33	12
33	16		34	11
34	13		35	15
35	17		36	8
36	12		36	18
37	4		37	5
37	7		37	16
37	23		38	1
47	18		47	20
48	12		48	13
48	15		50	12
50	14		50	17
52	11		52	15
52	22		52	24
53	8		53	9
55	5		55	8
55	10		55	11
55	14		56	6
56	8		60	3
60	5		60	9
60	11		60	14
61	19		61	23
62	1		62	9
62	11		62	15
62	18		62	25
63	2		63	9

Defendants' Deposition Designations
Kent Bristow (Fremont) 30(b)(6), May 28, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
63	11		63	24
64	1		64	1
64	13		64	21
65	3		65	16
65	18		66	3
66	5		66	8
67	17		67	23
68	4		69	1
69	3		69	9
69	11		70	25
71	2		71	9
71	12		72	6
72	9		72	25
73	2		73	2
73	6		75	3
75	6		76	3
76	6		77	20
78	8		78	25
79	3		79	14
79	16		79	24
80	1		80	4
80	18		81	4
81	6		81	24
82	1		82	11
83	16		84	25
85	3		86	2
86	5		86	10
86	18		86	25
87	2		87	21
87	23		88	8
88	11		88	11
88	13		88	14
89	2		90	10
91	15		92	17
93	1		93	25
94	13		95	10

Defendants' Deposition Designations
Kent Bristow (Fremont) 30(b)(6), May 28, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
95	12		96	17
96	22		97	6
97	8		97	20
100	11		101	22
101	24		102	1
102	6		102	25
103	2		103	23
103	25		104	17
104	19		105	5
105	8		105	8
105	11		105	20
105	24		106	14
106	17		107	20
107	23		109	16
109	18		110	2
110	4		110	13
110	15		111	10
111	13		112	4
112	6		112	15
112	18		112	21
113	16		114	2
114	8		115	11
115	19		116	8
116	10		117	18
118	2		119	3
119	5		121	12
122	3		125	24
126	1		126	13
126	15		126	19
126	21		128	12
128	14		128	24
129	7		129	8
131	4		131	12
131	14		132	5
132	8		132	10
132	24		133	2

Defendants' Deposition Designations
Kent Bristow (Fremont) 30(b)(6), May 28, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
133	11		133	15
133	17		133	21
134	1		135	19
135	21		136	2
136	4		136	7
136	9		136	19
136	21		138	11
139	2		139	7
139	13		139	23
140	13		142	16
142	18		142	25
143	2		143	21
143	23		144	11
145	9		148	21
148	23		149	7
150	14		151	11
151	13		152	4
153	16		154	11
154	13		155	15
155	21		156	5
157	1		158	3
158	5		158	16
158	21		159	23
159	25		160	22
160	24		161	7
161	21		162	5
162	7		163	23
163	25		168	4
168	6		169	25
170	2		170	12
170	14		171	12
171	14		172	2
172	4		173	12
173	14		173	22
173	24		174	24
176	12		179	22

Defendants' Deposition Designations
Kent Bristow (Fremont) 30(b)(6), May 28, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
179	24		181	9
181	11		182	11
182	14		182	19
183	6		184	4
184	6		189	18
189	20		191	1
191	3		192	10
192	12		193	7
193	9		194	5
194	8		194	17
194	20		195	6
195	8		196	9
196	11		196	24
197	1		197	11
197	14		198	22
198	24		199	6
199	15		199	21
201	24		202	5
202	8		202	21
202	23		203	17
203	20		204	12
204	15		204	23
206	20		211	19
211	21		212	11
212	13		214	7
214	9		214	21
215	6		217	1
217	11		218	20
219	16		219	20
219	22		221	8
221	10		221	25
222	18		223	13
223	24		224	3
224	5		225	14
225	16		226	22
227	20		228	13

Defendants' Deposition Designations
Kent Bristow (Fremont) 30(b)(6), May 28, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
228	16		233	3
234	15		237	4
237	6		237	6
237	20		238	5
238	7		238	18
238	20		239	8
239	10		241	16
241	18		241	24
242	1		242	8
242	10		242	24
243	2		243	15
243	17		244	8
244	11		244	25
245	3		245	4
245	12		246	1
246	4		247	8
247	10		247	21
247	23		249	2
249	4		249	15
249	17		249	20
250	6		250	8
250	10		252	18
252	20		252	24
253	1		253	20
253	22		255	6
255	7		255	13
255	15		256	20
256	22		256	25
257	17		258	2
258	19		258	22
258	24		261	19
261	22		262	2
262	4		262	4
262	15		264	22
264	24		265	8
265	18		266	17

Defendants' Deposition Designations
Kent Bristow (Fremont) 30(b)(6), May 28, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
266	20		268	25
269	3		270	18
270	21		271	3
271	5		271	12
271	14		273	6
274	3		274	7
274	9		274	17
275	1		275	7
275	10		276	10
276	20		277	1
277	3		277	23
277	25		279	6
279	16		279	21
279	24		281	7
281	9		283	10
283	12		283	19
283	21		284	3
284	5		284	15
284	25		285	5
285	7		287	13
287	15		289	16
289	18		290	1
290	3		290	5
290	8		290	17
291	2		291	8

Defendants' Deposition Designations
Jennifer Behm 30(b)(1), May 28, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
4	20		5	6
29	8		29	10
29	13		29	17
34	9		34	11
34	14		34	17
38	3		38	8
38	11		38	12
38	14		38	19
38	22		39	3
39	6		39	6
27	20		28	5
60	25		61	8
61	10		61	20
61	22		62	4
62	12		63	6
63	8		63	10
92	6		92	16
92	18		93	19

Defendants' Deposition Designations
Leif Murphy 30(b)(1), May 24, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
7	3		7	13
18	10		19	11
38	15		38	20
38	22		38	22
50	2		54	1
54	4		54	13
54	16		55	12
68	20		69	1
73	1		73	13
74	13		74	22
76	21		76	25
77	2		77	12
84	7		84	10
84	13		84	19
84	25		85	6
85	9		85	25
86	2		86	2
87	7		87	10
87	12		88	1
88	4		88	10
98	5		98	17
98	22		99	3
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101	12		101	19
101	16		101	19
101	21		101	21
103	21		103	24
104	1		104	15
104	25		105	17
108	14		108	16
108	18		108	23

109	1		109	5
109	8		109	19
109	22		109	25
114	2		117	9
117	11		118	1
118	3		118	8
118	10		118	11
118	21		118	23
119	1		119	9
125	5		125	7
125	25		126	14
126	16		126	19
127	16		127	24
128	2		128	11
128	13		128	18
128	20		128	22
133	25		135	9
142	1		142	9
142	12		142	16
144	16		144	19
144	22		144	24
149	15		149	25
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150	10		150	16
152	24		157	19
157	22		158	7
161	21		162	11
162	16		162	19
162	24		163	4
163	7		163	15
163	18		163	24
164	2		164	11
164	15		164	23
165	2		165	9
166	18		166	24

167	2		167	8
167	20		167	24
168	2		168	6
168	24		169	5
169	8		169	8
171	6		171	10
171	13		171	19
171	21		171	25
176	22		176	25
177	3		177	11
185	22		187	16
187	19		188	4
188	6		188	8
190	25		191	9
191	12		191	19
205	6		205	23
228	23		229	22
230	20		231	7
231	9		231	11
231	13		231	16
244	16		245	21
273	23		274	1
274	3		274	22
274	24		275	10
295	19		296	5
296	7		296	7
300	10		301	5
301	24		302	1

Defendants' Deposition Designations
Mark Kline 30(b)(1), May 25, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
7	3		7	10
21	15		22	14
28	11		28	17
31	23		33	19
61	21		63	25
132	11		133	6
133	10		133	15
134	4		134	19
136	4		136	15
137	9		137	20
137	23		138	6
138	9		138	18
139	2		139	6
139	9		139	20

Defendants' Deposition Designations

Rena Harris 30(b)(1), June 25, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
8	15		9	1
23	1		23	5
31	13		33	16
34	12		37	3
37	11		39	3
39	16		39	22
52	21		53	2
58	4		59	13
68	8		70	20
71	14		72	24
73	15		79	20
81	2		86	5
87	7		88	9
88	19		88	23
90	12		90	25
91	1		93	16
93	23		95	10
95	20		96	4
100	20		102	11
114	13		117	4
126	15		128	16
130	7		133	24
136	11		139	8
144	14		144	18
146	20		148	15
150	18		152	23
155	18		155	21
156	23		157	16
183	18		186	2
188	16		189	20
204	21		206	18
206	19		207	8
208	2		210	22
216	16		219	21
220	5		220	25
221	11		221	23

Defendants' Deposition Designations
Rena Harris 30(b)(1), June 25, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
222	24		223	4
223	21		224	7
232	10		238	3
239	2		242	1
259	14		264	18
270	5		271	18
272	23		275	9
278	7		292	4
299	10		301	18
302	13		302	22

Defendants' Deposition Designations
Kent Bristow 30(b)(1), May 14, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
7	2		7	16
14	15		15	25
16	11		16	15
16	17		17	6
17	9		17	10
17	12		17	19
17	21		18	12
18	14		18	16
19	17		19	21
19	23		19	25
20	21		20	25
21	5		21	5
21	21		22	7
22	9		22	23
22	25		23	19
23	24		25	3
25	5		28	10
30	8		30	15
30	23		33	19
33	21		33	23
34	5		35	17
35	19		35	19
36	1		36	5
36	14		38	13
38	15		39	16
39	18		40	4
40	13		40	17
40	19		40	20
41	1		41	9
42	10		43	16
43	18		44	21
45	1		46	6
49	3		50	5
50	9		50	19
51	7		51	19
52	4		53	13

Defendants' Deposition Designations
Kent Bristow 30(b)(1), May 14, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
53	15		54	19
54	22		54	23
55	1		55	4
55	14		56	1
56	3		57	1
57	3		57	21
58	14		60	18
60	20		60	20
66	12		66	24
67	14		67	23
69	4		69	10
69	12		69	12
70	1		70	6
70	8		71	1
71	3		71	5
71	16		71	19
72	1		72	10
72	14		72	22
72	25		73	8
73	11		73	18
73	21		73	25
74	15		74	20
74	22		75	8
75	14		75	21
75	24		76	20
76	22		77	7
77	9		77	17
78	14		78	17
78	19		79	4
79	6		79	11
79	13		79	22
82	12		83	16
84	8		84	14
84	17		85	5
85	7		85	17
85	19		85	19

Defendants' Deposition Designations
Kent Bristow 30(b)(1), May 14, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
86	7		88	2
88	4		88	17
88	25		89	5
89	7		90	12
90	15		91	16
92	5		92	15
92	18		93	20
93	22		94	15
94	17		96	4
96	6		97	15
97	23		98	22
99	1		99	14
99	22		101	14
101	19		101	23
102	5		102	5
107	14		109	2
113	2		113	10
113	14		113	24
114	1		114	2
127	20		128	7
129	21		129	24
130	1		130	24
131	21		132	20
132	22		132	22
133	18		133	20
133	21		133	21
134	14		134	18
135	1		135	1
136	7		136	12
136	15		136	15
136	17		136	17
137	19		138	3
138	5		138	5
171	3		171	11
171	25		171	25
172	2		172	7

Defendants' Deposition Designations
Kent Bristow 30(b)(1), May 14, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
172	9		172	9
172	20		173	1
173	4		173	4
173	6		173	17
173	19		173	19
173	24		174	5
174	7		174	12
174	14		174	15
174	22		175	1
175	3		175	16
175	18		176	2
176	4		176	23
177	1		177	5
177	7		177	22
177	24		178	6
178	8		178	15
178	18		178	2
180	5		180	19
180	22		181	15
181	18		181	22
181	24		182	10
182	13		182	13
182	25		184	12
184	17		186	10
186	12		187	12
187	14		187	24
188	2		191	6
191	21		192	19
192	21		193	15
193	17		193	22
193	24		196	18
196	20		197	1
198	25		199	19
199	21		200	1
200	4		200	4
200	6		200	14

Defendants' Deposition Designations
Kent Bristow 30(b)(1), May 14, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
200	16		200	24
201	3		201	9
201	12		201	12
201	15		201	16
201	18		203	21
203	23		204	5
204	7		204	7
204	15		204	18
204	20		205	3
205	6		206	16
206	19		206	21
208	13		208	18
208	20		209	11
209	13		209	18
209	20		211	7
211	9		211	13
211	15		211	24
212	1		212	12
212	14		212	18
212	20		213	2
213	4		213	19
213	21		214	12
214	14		215	14
215	16		216	2
216	5		216	6
216	13		216	16
216	18		216	25
217	2		217	8
217	10		219	3
219	11		219	24
221	3		222	6
222	12		222	22
222	24		223	2
223	4		223	7
223	9		223	17
223	19		224	1

Defendants' Deposition Designations
Kent Bristow 30(b)(1), May 14, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
224	3		224	18
224	20		224	24
228	6		228	14
228	16		229	1
229	3		230	16
230	18		231	11
232	3		232	20
235	14		236	4
236	6		236	16
236	18		236	21
236	22		237	9
237	11		237	22
238	10		238	17
238	20		239	14
239	16		239	20
240	15		242	13
242	15		243	25
244	3		244	3
244	5		245	23
245	24		246	7
246	9		246	19
249	14		256	17
256	24		257	2
257	5		257	5
257	7		260	6
260	13		261	3
263	18		263	22
265	12		265	16
269	8		269	17
270	1		270	22
271	2		272	6
273	19		274	16
274	24		278	16
278	18		278	24
281	8		281	13
281	17		281	21

Defendants' Deposition Designations
Kent Bristow 30(b)(1), May 14, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
282	2		282	14
283	1		283	5
283	14		283	20
283	23		287	1
287	16		288	3
288	13		289	14
289	23		290	2
290	15		291	1
291	7		291	12
291	17		292	10
293	6		293	10
294	14		299	2
300	12		301	21
302	7		302	10
303	19		304	20
304	22		306	11
307	3		307	7
307	9		307	9
307	12		308	18
308	24		309	16
309	25		311	22
312	3		312	12
312	20		317	6

Defendants' Deposition Designations

Dan Schumacher, May 26, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
7	12		8	17
11	5		11	13
22	20		22	24
28	20		30	8
34	25		35	9
37	3		37	6
37	20		38	18
39	2		39	9
44	18		44	24
149	17		150	12
162	11		162	20
164	21		164	23
165	18		165	23
217	4		217	10
218	2		218	19
237	22		239	16
240	13		248	13
255	3		255	12

Defendants' Deposition Designations
Kent Bristow (Team Physicians) 30(b)(6), May 13, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
8	11		9	1
19	13		21	16
22	12		23	3
23	15		23	17
23	19		24	5
25	1		25	9
25	11		25	20
26	4		26	23
26	25		27	6
27	8		27	10
27	18		28	14
28	16		28	19
28	21		29	4
29	6		29	6
29	14		29	21
30	9		31	25
32	12		32	24
33	1		33	13
33	15		35	6
35	8		35	14
35	16		35	23
35	25		35	25
36	19		37	5
37	14		37	19
37	21		37	25
38	10		38	18
38	23		39	3
39	5		39	12
39	14		39	18
39	20		40	15
40	17		41	5
41	8		41	9
41	20		41	24
42	10		42	15
42	17		43	8
43	10		44	8

Defendants' Deposition Designations
Kent Bristow (Team Physicians) 30(b)(6), May 13, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
44	10		44	20
44	23		45	10
45	14		46	11
46	13		47	16
47	18		47	18
48	3		48	10
48	13		49	1
49	4		49	7
49	9		50	5
50	12		50	22
51	9		52	2
52	4		52	12
52	14		52	18
52	20		53	8
53	13		54	2
54	12		54	14
54	22		54	22
55	7		55	12
55	16		55	18
55	20		56	14
56	16		57	7
57	9		57	14
57	16		59	3
59	5		59	11
59	13		59	13
59	15		59	20
60	2		60	20
60	22		60	22
61	3		61	14
61	16		62	18
62	20		63	10
63	12		63	17
63	19		63	23
63	25		63	25
64	2		64	8
64	10		64	11

Defendants' Deposition Designations
Kent Bristow (Team Physicians) 30(b)(6), May 13, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
65	10		65	15
65	17		66	2
66	4		66	16
66	18		66	22
66	24		67	20
68	13		68	25
69	2		69	9
69	21		70	15
70	17		70	25
72	17		72	20
72	22		73	8
73	10		74	13
74	16		74	23
75	1		75	13
75	15		75	21
75	23		76	10
76	12		77	8
77	10		78	8
78	10		78	18
78	20		79	10
79	12		79	24
80	1		80	7
80	9		80	22
80	24		81	10
81	12		81	24
82	1		82	25
83	2		84	5
84	7		84	24
85	1		85	3
85	16		85	20
85	23		86	12
86	15		86	23
86	25		87	7
87	9		87	15
87	18		88	21
89	7		89	10

Defendants' Deposition Designations
Kent Bristow (Team Physicians) 30(b)(6), May 13, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
89	12		89	22
89	24		90	4
90	6		90	10
90	12		90	24
91	1		91	5
91	7		92	3
92	5		92	22
92	24		93	7
94	10		94	19
97	11		98	11
98	13		98	22
98	24		99	5
99	7		99	25
100	2		100	2
100	21		102	5
102	14		104	25
105	2		105	3
105	13		106	1
106	5		106	24
107	2		107	3
107	15		108	4
108	6		108	15
108	17		108	22
108	24		110	4
110	6		110	19
110	21		110	21
111	5		112	11
112	13		112	16
112	18		113	17
114	5		115	1
115	25		116	5
116	7		117	1
117	6		117	10
117	12		117	22
117	25		118	1
118	4		118	19

Defendants' Deposition Designations
Kent Bristow (Team Physicians) 30(b)(6), May 13, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
118	21		118	23
119	13		119	20
120	24		121	14
121	21		121	25
122	12		122	15
122	17		123	14
123	22		124	14
124	17		125	19
125	21		126	7
126	9		126	16
126	18		126	25
127	2		128	1
128	3		128	11
128	13		128	22
129	1		129	5
129	7		130	2
130	4		130	10
130	12		130	20
130	22		131	11
131	12		131	20
131	22		132	4
132	6		132	13
132	15		133	6
133	8		133	15
133	18		134	17
134	19		135	3
136	12		139	23
140	16		140	23
140	25		142	2
144	11		144	16
145	1		145	10
145	16		150	9
150	17		150	23
150	25		151	18
151	20		152	7
152	9		153	15

Defendants' Deposition Designations
Kent Bristow (Team Physicians) 30(b)(6), May 13, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
153	22		154	25
156	18		158	23
159	8		159	14
159	16		159	21
159	23		160	5
160	7		160	21
160	23		161	8
161	10		161	10
161	14		166	12
166	14		167	17
167	19		170	16
170	18		171	14
172	2		172	8
172	10		172	18
172	20		173	15
173	17		174	9
174	11		177	9
177	11		177	18
178	1		178	23
179	3		179	19
179	21		181	1
184	3		185	21
186	2		188	2
189	1		189	5
189	14		189	24
190	1		190	7
190	9		191	3
191	5		191	14
191	16		191	24
192	1		192	9
192	11		192	21
192	23		192	25
193	6		193	16
193	25		194	16
194	18		196	4
196	15		196	21

Defendants' Deposition Designations
Kent Bristow (Team Physicians) 30(b)(6), May 13, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
196	24		197	13
197	15		198	2
198	5		199	10
199	21		199	25
200	25		202	9
202	11		203	23
203	25		204	20
210	3		210	13
210	22		211	23
211	25		212	3
212	5		213	9
213	22		215	11
215	19		216	10
216	21		218	6
218	17		220	9
220	11		220	15
220	17		220	18
222	4		222	8
222	14		223	8
223	12		224	4
224	6		224	24
225	1		225	4
225	7		225	13
226	12		226	18
226	20		228	1
228	6		228	15
228	24		229	22
230	12		230	19
230	22		232	23
232	25		233	20
233	22		234	6
234	13		235	14
235	21		236	11
237	1		239	10
240	6		241	9
241	11		241	16

Defendants' Deposition Designations
Kent Bristow (Team Physicians) 30(b)(6), May 13, 2021

Defendants' Initial Designations				
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241	18		241	22
241	24		241	24
243	2		243	21
244	1		244	15
244	24		246	2
246	4		246	23
246	25		247	19
247	22		248	4
248	7		248	17
248	23		253	19
253	24		257	23
258	1		259	4
259	6		259	18
259	20		260	1
260	3		260	11
261	15		263	3
263	6		263	16
264	7		264	24
267	7		267	23
269	16		271	5
271	11		271	13
271	15		271	19
272	4		274	7
274	13		274	18
275	14		275	21
276	1		276	9
276	17		277	1
277	4		278	23
279	17		281	7
281	16		283	3
283	21		284	4
284	6		287	3
287	5		287	19
287	21		288	6
288	8		288	25
289	2		290	16

Defendants' Deposition Designations
Kent Bristow (Team Physicians) 30(b)(6), May 13, 2021

Defendants' Initial Designations				
Page	Line	to	Page	Line
290	19		290	19
290	21		291	1
291	4		293	9
293	15		294	22
295	10		297	3
297	5		298	16
298	18		298	23
298	25		298	25
300	18		301	7
301	15		301	22
303	1		303	4
303	6		304	2
304	4		304	16
304	22		305	19
305	21		306	13
306	16		307	1
307	3		308	18
309	5		309	11
309	13		309	13
209	18		311	9
311	11		311	11
311	24		314	7
315	18		316	5
316	7		316	7
316	16		316	21
316	23		317	9
317	11		318	7
318	15		318	18
318	20		319	2