

1 Timothy J. Halloran - 104498
 Thomas P. Mazzucco - 139758
 2 MURPHY, PEARSON, BRADLEY & FEENEY
 88 Kearny Street, 10th Floor
 3 San Francisco, CA 94108-5530
 Tel: (415) 788-1900
 4 Fax: (415) 393-8087

5 Specially Appearing for
 JOHN STEELE

7 UNITED STATES DISTRICT COURT
 8 CENTRAL DISTRICT OF CALIFORNIA

10 INGENUITY 13 LLC,
 11 Plaintiff,
 12 v.
 13 JOHN DOE,
 14 Defendants.

Case No.: CV-12-8333- ODW(JCx)

**OBJECTIONS TO PROFFERED
 EVIDENCE SUBMITTED BY
 PUTATIVE JOHN DOE**

Judge: Hon. Otis D. Wright, II
 Courtroom: 11
 Date: April 2, 2013
 Time: 10:00 A.M.

Complaint Filed: September 27, 2012
 Trial Date: None

18 John Steele (“Steele”), specially appearing, hereby objects to the following
 19 purported evidence submitted by putative John Doe:
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Evidence/Exhibit	Objection	Sustained	Overruled
Dkt 40-1 (Pietz Decl.), ¶ 5	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Double Hearsay. FRE 805.		
Dkt 40-1 (Pietz Decl.), ¶ 6	Relevance. FRE 401. Lacks foundation. FRE 602.		
Dkt 40-1 (Pietz Decl.), ¶ 8	Relevance. FRE 401. Lacks foundation. FRE 602.		

1	Dkt 40-1 (Pietz Decl.), ¶9	Relevance. FRE 401. Lacks foundation. FRE 602. Lacks authentication.FRE 901. Hearsay. FRE 801(c).		
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3	Dkt 40-1 (Pietz Decl.), ¶10	Relevance. FRE 401. Lacks foundation. FRE 602.		
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5	Dkt 40-1 (Pietz Decl.), ¶11	Relevance. FRE 401. Lacks foundation. FRE 602.		
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7	Dkt 40-1 (Pietz Decl.), ¶12	Relevance. FRE 401. Lacks foundation. FRE 602. Relevance; the document speaks for itself. FRE 403		
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9	Dkt 40-1 (Pietz Decl.), ¶13	Relevance. FRE 401. Lacks foundation. FRE 602. Relevance; the document speaks for itself. FRE 403.		
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11	Dkt 40-1 (Pietz Decl.), ¶14	Relevance. FRE 401. Lacks foundation. FRE 602.		
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13	Dkt 40-1 (Pietz Decl.), ¶15	Relevance. FRE 401. Lacks foundation. FRE 602. Relevance; the document speaks for itself. FRE 403.		
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15	Dkt 40-1 (Pietz Decl.), ¶16	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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17	Dkt 40-1 (Pietz Decl.), ¶17	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Double hearsay. FRE 805.		
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19	Dkt 40-1 (Pietz Decl.), ¶18	Relevance. FRE 401. Lacks foundation. FRE 602.		
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21	Dkt 40-1 (Pietz Decl.), ¶19	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Relevance; the document speaks for itself. FRE 403.		
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23	Dkt 40-1 (Pietz Decl.), ¶20	Relevance. FRE 401. Lacks foundation. FRE 602. Lacks authentication.FRE 901. Hearsay. FRE 801(c).		
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25	Dkt 40-1 (Pietz Decl.), ¶21	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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1	Dkt 40-1 (Pietz Decl.), ¶22	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Relevance; the document speaks for itself. FRE 403.		
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4	Dkt 40-1 (Pietz Decl.), ¶23	Relevance. FRE 401. Lacks foundation. FRE 602.		
5	Dkt 40-1 (Pietz Decl.), ¶24	Relevance. FRE 401.		
6	Dkt 40-1 (Pietz Decl.), ¶25 – 27	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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8	Dkt 40-1 (Pietz Decl.), ¶28	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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10	Dkt 40-1 (Pietz Decl.), ¶29	Lacks foundation. FRE 602.		
11	Dkt 40-1 (Pietz Decl.), ¶30-34	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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14	Dkt 40-1 (Pietz Decl.), ¶35	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602. Lacks authentication. FRE 901. Hearsay. FRE 801(c).		
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17	Dkt 40-1 (Pietz Decl.), ¶36	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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20	Dkt 40-1 (Pietz Decl.), ¶37	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation (re: reference to Cooper’s attorney). FRE 602.		
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23	Dkt 40-1 (Pietz Decl.), ¶38	Relevance. FRE 401. Lacks foundation (re: reference to Cooper’s attorney). FRE 602. Hearsay. FRE 801(c).		
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26	Dkt 40-1 (Pietz Decl.), ¶39	Relevance. FRE 401. The document speaks for itself. FRE 403. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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1	Dkt 40-1 (Pietz Decl.), ¶40	Relevance. FRE 401. The document speaks for itself. FRE 403. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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4	Dkt 40-1 (Pietz Decl.), ¶41	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602.		
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6	Dkt 40-1 (Pietz Decl.), ¶43	Relevance. FRE 401. Lacks foundation. FRE 602.		
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8	Dkt 40-1 (Pietz Decl.), ¶44	Relevance. FRE 401. The document speaks for itself. FRE 403. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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10	Dkt 40-1 (Pietz Decl.), ¶45	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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12	Dkt 40-1 (Pietz Decl.), ¶46	Relevance. FRE 401. The document speaks for itself. FRE 403. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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15	Dkt 40-1 (Pietz Decl.), ¶47	Relevance. FRE 401. The document speaks for itself. FRE 403. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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18	Dkt 40-1 (Pietz Decl.), ¶48	Relevance. FRE 401. Lacks foundation. FRE 602.		
19	Dkt 53 (Pietz Decl.), ¶7	Relevance. FRE 401. The documents speak for themselves. FRE 403.		
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21	Dkt 53 (Pietz Decl.), ¶8	Relevance. FRE 401. The document speaks for itself. FRE 403.		
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23	Dkt 53 (Pietz Decl.), ¶9	Relevance. FRE 401. The document speaks for itself. FRE 403. Lacks foundation. FRE 602.		
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26	Dkt 53 (Pietz Decl.), ¶11	Relevance. FRE 401. The document speaks for itself. FRE 403. Lacks foundation. FRE 602.		
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Dkt 53 (Pietz Decl.), ¶12	Relevance. FRE 401. The document speaks for itself. FRE 403. Lacks foundation. FRE 602.		
Dkt 53 (Pietz Decl.), ¶14	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602.		
Dkt 53 (Pietz Decl.), ¶16	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602.		
Dkt 53 (Pietz Decl.), ¶17	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602.		
Dkt 53 (Pietz Decl.), ¶18	Relevance. FRE 401. Lacks foundation. FRE 602.		
Dkt 53 (Pietz Decl.), ¶19	Relevance. FRE 401. Lacks foundation. FRE 602.		
Dkt 53 (Pietz Decl.), ¶20	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602.		
Dkt 53 (Pietz Decl.), ¶21	Relevance. FRE 401. Lacks foundation. FRE 602.		
Dkt 53 (Pietz Decl.), ¶22	Relevance. FRE 401. Lacks foundation. FRE 602.		
Dkt 59-1 (Pietz Decl.), ¶6	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
Dkt 59-1 (Pietz Decl.), ¶7	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602.		
Dkt 59-1 (Pietz Decl.), ¶8	Relevance. FRE 401. The document speaks for itself. FRE 403. Lacks foundation. FRE 602.		
Dkt 59-1 (Pietz Decl.), ¶9	Relevance. FRE 401. Lacks foundation. FRE 602.		

1	Dkt 59-1 (Pietz Decl.), ¶10	Relevance. FRE 401. Lacks foundation. FRE 602. Impermissible Non-expert opinion testimony. FRE 701.		
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3	Dkt 59-1 (Pietz Decl.), ¶11	Relevance. FRE 401. Lacks foundation. FRE 602. Impermissible Non-expert opinion testimony. FRE 701.		
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5	Dkt 117-1 (Pietz Decl.), ¶3	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602.		
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7	Dkt 117-1 (Pietz Decl.), ¶4	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602.		
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9	Dkt 117-1 (Pietz Decl.), ¶5	Relevance. FRE 401. Lacks foundation. FRE 602.		
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11	Dkt 117-1 (Pietz Decl.), ¶6	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602.		
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13	Dkt 117-1 (Pietz Decl.), ¶7	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602.		
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15	Dkt 117-1 (Pietz Decl.), ¶8	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602.		
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17	Dkt 117-1 (Pietz Decl.), ¶10	Relevance. FRE 401. Lacks foundation. FRE 602.		
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19	Dkt 40-2, Ex. A	Relevance. FRE 401. Lacks foundation. FRE 602. Lacks authentication. FRE 901. Hearsay. FRE 801(c).		
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21	Dkt 40-2, Ex. B	Lacks foundation. FRE 602. Lacks authentication. FRE 901 Hearsay. FRE 801(c). Uncertified Public Record. FRE 1005.		
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23	Dkt 40-2, Ex. C	Relevance. FRE 401. Lacks foundation. FRE 602. Lacks authentication. FRE 901. Hearsay. FRE 801(c).		
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1	Dkt 40-2, Ex. D	Relevance. FRE 401. Lacks foundation. FRE 602. Lacks authentication.FRE 901.		
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3	Dkt 40-2, Ex. E	Relevance. FRE 401. Lacks foundation. FRE 602. Lacks authentication.FRE 901.		
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5	Dkt 40-2, Ex. F	Relevance. FRE 401. Lacks foundation. FRE 602. Lacks authentication. FRE 901.		
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7	Dkt 40-2, Ex. G	Relevance. FRE 401.		
8	Dkt 40-2, Ex. H	Relevance. FRE 401. Lacks foundation. FRE 602. Lacks authentication.FRE 901. Hearsay. FRE 801(c).		
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10	Dkt 40-2, Ex. I	Relevance. FRE 401. Hearsay. FRE 801(c). Double hearsay. FRE 805.		
11	Dkt 40-2, Ex. J	Relevance. FRE 401. Lacks foundation. FRE 602. Lacks authentication.FRE 901. Hearsay. FRE 801(c).		
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13	Dkt 40-2, Ex. K	Relevance. FRE 401. Hearsay. FRE 801(c).		
14				
15	Dkt 40-2, Ex. L	Relevance. FRE 401. Lacks foundation. FRE 602. Lacks authentication.FRE 901. Hearsay. FRE 801(c).	Relevance objection sustained when introduced as Exhibit 3 at March 11, 2013 OSC Hearing. Dkt 108-5.	
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21	Dkt 40-2, Ex. M	Relevance. FRE 401. Hearsay. FRE 801(c).		
22	Dkt 40-2, Ex. N	Relevance. FRE 401. Lacks foundation. FRE 602. Lacks authentication.FRE 901. Hearsay. FRE 801(c). Uncertified Public Record. FRE 1005.		
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Dkt 40-2, Ex. O	Relevance. FRE 401. Lacks foundation. FRE 602. Lacks authentication. FRE 901. Hearsay. FRE 801(c). Uncertified Public Record. FRE 1005.		
Dkt 53-1, Ex. P	Relevance. FRE 401.		
Dkt 53-1, Ex. Q	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
Dkt 53-1, Ex. R	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
Dkt 53-1, Ex. S	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Double hearsay. FRE 805 Uncertified Public Record. FRE 1005.	Relevance objection sustained when introduced as Exhibit 4 at March 11, 2013 OSC Hearing. Dkt 108-5.	
Dkt 53-1, Ex. T	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Double hearsay. FRE 805 Lacks authentication. FRE 901 Uncertified Public Record. FRE 1005.	Relevance objection sustained when introduced as Exhibit 5 at March 11, 2013 OSC Hearing. Dkt 108-5.	
Dkt 53-1, Ex. U	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Lacks authentication. FRE 901.		
Dkt 53-1, Ex. V	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Lacks authentication. FRE 901 Uncertified Public Record. FRE 1005.		

1	Dkt 53-1, Ex. W	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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3	Dkt 53-1, Ex. X	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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6	Dkt 53-1, Ex. Y	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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8	Dkt 53-1, Ex. Z	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Lacks authentication. FRE 901		
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10	Dkt 53-1, Ex. AA	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Lacks authentication. FRE 901		
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12	Dkt 53-1, Ex. BB	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Lacks authentication. FRE 901		
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14	Dkt 53-1, Ex. CC	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Lacks authentication. FRE 901		
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17	Dkt 53-1, Ex. DD	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Lacks authentication. FRE 901		
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19	Dkt 59-2, Ex. EE	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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21	Dkt 59-2, Ex. FF	Relevance. FRE 401. The documents speak for themselves. FRE 403. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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24	Dkt 59-2, Ex. GG	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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1	Dkt 59-2, Ex. HH	Relevance. FRE 401. Lacks foundation. FRE 602. Impermissible Non-expert opinion testimony. FRE 701. Hearsay. FRE 801(c). Double hearsay. FRE 805. Lacks authentication. FRE 901 ¹		
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5	Dkt 59-2, Ex. II	Relevance. FRE 401. Lacks foundation. FRE 602. Impermissible Non-expert opinion testimony. FRE 701. Hearsay. FRE 801(c).		
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8	Dkt 59-2, Ex. JJ	Relevance. FRE 401. Lacks foundation. FRE 602. Impermissible Non-expert opinion testimony. FRE 701. Hearsay. FRE 801(c).		
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11	Dkt 117-2, Ex. KK	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Double hearsay. FRE 805.		
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13	Dkt 117-2, Ex. LL	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Lacks authentication. FRE 901.		
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15	Dkt 117-2, Ex. MM	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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17	Dkt 117-2, Ex. NN	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c).		
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19	Dkt 117-2, Ex. OO	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Lacks authentication. FRE 901.		
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21	Dkt 117-2, Ex. PP	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Lacks authentication. FRE 901.		
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24	Dkt 117-2, Ex. QQ	Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Lacks authentication. FRE 901.		
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¹ Steele also joins the objection made at the March 11, 2013 OSC Hearing, to all of the improper testimony of counsel, Morgan Pietz, made in relation to this Exhibit (Exhibit 9 as introduced to the Court).

<p>1 Exhibit 10 presented at March 11, 2 2013 OSC Hearing (Declaration of 3 Michael Stone)</p>	<p>Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Lacks authentication. FRE 901.</p>		
<p>4 Exhibit 11 presented at March 11, 5 2013 OSC Hearing (Declaration of Mr. 6 Teitelbaum)</p>	<p>Relevance. FRE 401. Lacks foundation. FRE 602. Hearsay. FRE 801(c). Lacks authentication. FRE 901.</p>		
<p>7 Exhibit 12 presented at March 11, 8 2013 OSC Hearing (Affidavit of Steele)</p>	<p>Relevance. FRE 401.</p>		

9 Dated: April 19, 2013

MURPHY, PEARSON, BRADLEY & FEENEY

10 By /s/ Timothy J. Halloran

11 Timothy J. Halloran

12 Attorneys for
13 JOHN STEELE