

EXAMPLE #4 – Agreed-Upon Chart of Objections to Witnesses or Exhibits

[Include a caption page]

Witness/Exhibit Chart

Exhibit Number & Description	Objection(s)/Argument	Ruling
Ptlf's Ex. 4 - email between Myers and Susan Burleigh dated January 15, 2009	hearsay, relevance, prejudicial	
Ptlf's Ex. 6 - Houze's interview notes from termination meeting	incomplete	
Ptlf's Ex. 8 - email between ptlf and Myers dated Oct. 29, 2008	hearsay, relevance, prejudicial	
Ptlf's Ex. 17 - email between ptlf, Myers, and Karyn O'Donnell dated Nov. 13, 2008 w/ attached field visit for Oct. 28, 2008	hearsay, relevance, prejudicial	
Ptlf's 24 - Summary of Advances from meeting dated April 2008	hearsay	
Ptlf's Ex. 30 - print of a slide from the "2009 Execution Excellence Framework"	incomplete	
Deft's Ex. 508 - Lilly's U.S Procedure on Travel & Expense Reporting; 1/1/08	"Relevance"; defts argue it is relevant to ptlf's understanding of recordkeeping obligations	
Deft's Ex. 514 - 2/28/08 email between ptlf and Myers re: ptlf vacation day	"Relevance"; defts argue the document contradicts ptlf's claim that she did not need to account for her time and she could take time out of territory as she saw fit; also argue doc contradicts ptlf's claim she was not required to adhere to District Expectations	

Witness	Objection(s)/Argument	Ruling
Plaintiff's Witness - Dr. Peter Watson	Objection to all of his testimony; FRE 402, 403: relevance, prejudicial	
Plaintiff's Witness - Unnamed "Former Lilly Sales Representative"	Objection to all of his testimony; FRCP 37(c)(1): failure to identify witness as required by Rule 26(a)	
Plaintiff's Witness - Kyle Schuett	Objection to testimony regarding overhearing conversations between plaintiff and Myers; FRCP 37(c)(1): failure to identify this part of witness's testimony as required by Rule 26(a)	
Plaintiff's Witness - Miranda Mascelia	Objection to testimony regarding plaintiff's complaints made to witness who is an HR rep for deft; objection based on relevance	
Plaintiff's Witness - Karyn O'Donnell	Objection to testimony regarding plaintiff's complaints made to witness who is an HR rep for deft; objection based on relevance	
Defendant's Witness - Camille Myers	Objection to any testimony that something other than "call falsification" was basis for termination; same arguments made in support of pltf's motion in limine #3 re: relevance and prejudice under FRE 402, 403	
Defendant's Witness - Camille Myers	Objection to any testimony re: deft's Exhibit 555 (the call policy); same arguments made in support of pltf's motion in limine #1 re: relevance	