

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

MOTORS LIQUIDATION COMPANY, f/k/a
GENERAL MOTORS CORPORATION, *et al.*,

Chapter 11

Case No. 09-50026 (MG)
(Jointly Administered)

Debtors.

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MOTORS LIQUIDATION COMPANY AVOIDANCE
ACTION TRUST, by and through the Wilmington Trust
Company, solely in its capacity as Trust Administrator and
Trustee,

Plaintiff,

Adversary Proceeding

Case No. 09-00504 (MG)

against

JPMORGAN CHASE BANK, N.A., *et al.*,

Defendants.
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JOINT PRETRIAL ORDER

The parties having conferred among themselves and with the Court pursuant to
Fed. R. Civ. P. 16, the following statements, directions and agreements are adopted as the
Pretrial Order herein.

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I. NATURE OF THE CASE

General Motors Corporation (“**Old GM**”) was the borrower under a \$1.5 billion secured loan (the “**Term Loan**”) governed by a Term Loan Agreement among Old GM, Saturn Corporation (“**Saturn**”), JPMorgan Chase Bank, N.A. (“**JPMorgan**”), as administrative agent, and a syndicate of lenders (with JPMorgan, collectively the “**Term Lenders**”). The Term Loan was secured by, among other things, Old GM’s and Saturn’s equipment and fixtures at a number of United States facilities. On June 30, 2009, Old GM wired approximately \$1.5 billion to JPMorgan, which was distributed to the Term Lenders, in full satisfaction of the Term Loan.

The above-captioned proceeding (the “**Avoidance Action**”) is an adversary proceeding commenced by the Motors Liquidation Company Avoidance Action Trust (“**Plaintiff**”), as successor-plaintiff to the Official Committee of Unsecured Creditors (the “**Committee**”) of Motors Liquidation Company, against JPMorgan and the other Term Lenders (collectively, “**Defendants**”) seeking to avoid the approximately \$1.5 billion Term Loan repayment.¹

On July 31, 2009, the Committee filed its initial complaint seeking to avoid the approximately \$1.5 billion Term Loan repayment on the basis that an umbrella UCC-1 financing statement filed in Delaware that perfected the Term Lenders’ security interests in equipment, fixtures, and related intangibles had been terminated. After the Second Circuit ruled that the umbrella UCC-1 had been effectively terminated prior to Old GM’s June 1, 2009 Chapter 11 bankruptcy petition, Plaintiff (as successor to the Committee) filed an amended complaint on May 20, 2015. Plaintiff’s amended complaint alleges that the lien on the collateral securing the

¹ For the avoidance of doubt, as defined and discussed herein, the Avoidance Action does not include the cross-claims filed by certain of the Term Lenders against JPMorgan. No cross-claims or cross-claim-related issues will be addressed or decided at the Representative Assets Trial (as discussed below). The parties reserve all rights with respect to the cross-claims.

Term Loan was not perfected as of June 1, 2009, and to the extent that some portion of the collateral was perfected by filings other than the umbrella UCC-1, the value of that portion of the collateral was less than the amount paid to Defendants and Defendants were not entitled to receive payment in excess of that amount. Defendants' claim that 26 other financing statements, known as fixture filings, covered the fixtures in a number of Old GM U.S. facilities and which statements were filed in the records of the counties in which such facilities are located.² The amended complaint seeks to recover from each of the Term Lenders their respective portion of the Term Loan repayment that exceeds the amount they are entitled to, along with other ancillary relief.

Following the filing of the amended complaint, Plaintiff and Defendants engaged in initial discovery as to the scope and value of the Term Loan collateral. Based on that initial discovery, it became clear that two principal issues divide the parties: (a) which of the over 200,000 assets of Old GM located in the facilities covered by the fixture filings are "fixtures," and (b) what is the proper methodology for valuing assets that are found to be fixtures.

In light of the broad scope of the dispute, the Court ordered this initial trial (the "**Representative Assets Trial**") that will focus on 40 representative assets selected by the parties (the "**Representative Assets**"). At the Representative Assets Trial, the Court will be asked to decide:

- (a) Whether each of the 40 Representative Assets is a fixture; and
- (b) What principles should be applied in valuing the Representative Assets as of June 30, 2009 (the agreed upon "**Valuation Date**"), and what was the value of each Representative Asset as of the Valuation Date applying those principles.

² There was another umbrella financing statement in Delaware covering Saturn's equipment and fixtures, which is not at issue in the Representative Assets Trial (as defined below).

The Court will also be asked to decide three additional issues relevant to determining the scope of the Term Loan collateral:

(c) Whether Representative Asset No. 11, the CUC, is a fixture in which the Defendants had a perfected security interest as of June 1, 2009;

(d) Whether Defendants had a perfected security interest in the fixtures at the GM assembly and stamping facilities at Lansing Delta Township (the “**Lansing Facilities**”) as of June 1, 2009, and whether Plaintiff’s challenge to Defendants’ security interest in the fixtures at the Lansing Facilities is time-barred;

(e) Whether Defendants had a perfected security interest in the fixtures at GM Powertrain Pontiac Engineering facility, as of June 1, 2009.

After receiving the Court’s decision following the Representative Assets Trial, the parties have agreed to engage in mediation to attempt to resolve the Avoidance Action.

II. BASIS FOR JURISDICTION, WHETHER THE CASE IS CORE OR NON-CORE, AND WHETHER THE BANKRUPTCY JUDGE MAY ENTER FINAL ORDERS OR JUDGMENT

The Court has subject matter jurisdiction over the Avoidance Action pursuant to 28 U.S.C. §§ 157 and 1334(b) and (e). The Avoidance Action is a civil proceeding arising under, arising in, or related to cases under title 11 of the United States Code (the “Bankruptcy Code”). The Avoidance Action is referred to the Court pursuant to 28 U.S.C. § 157(a) and the Standing Order of Referral of Cases to Bankruptcy Judges in this District. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

The Avoidance Action is a core proceeding pursuant to 28 U.S.C. §§ 157(b)(2)(A), (B), (E), (K), and (O).

The Court may enter final orders and judgments with respect to the issues to be decided by the Representative Assets Trial.

If it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments with respect to the issues to be decided by the Representative Assets Trial consistent with Article III of the United States Constitution, Plaintiff and Defendants consent to entry of final orders and judgments by this Court with respect to the issues to be decided by the Representative Assets Trial.

III. BURDEN OF PROOF

The parties agree that in the specific circumstances of the Avoidance Action, Defendants bear the burden of proof on the issues to be tried, except the parties disagree on which party bears the burden with respect to the issue of whether Defendants had a perfected security interest in any fixtures at the Lansing Facilities. Plaintiff contends that Defendants bear the burden on this issue as well. Defendants contend that Plaintiff bears the burden on this issue.

IV. STIPULATED FACTS

The parties admit, stipulate, and agree that:

A. OLD GM

1. Old GM manufactured automobiles.
2. As of March 31, 2009, Old GM employed approximately 235,000 persons worldwide, with approximately 91,000 of those employed in the U.S.
3. Old GM utilized the services of thousands of different suppliers.
4. At least hundreds and possibly thousands of automotive parts suppliers depended on Old GM for survival.
5. Competition from foreign automakers and high costs put pressure on Old GM in the period leading up to 2009.

6. With the growth of competitors, between 1980 and early 2009, Old GM's market share for new North American vehicle sales dropped from approximately 45% to approximately 19.5%.

7. The pressure mounted in the fall of 2008 with an increase in gas prices, contraction of the credit markets, lowering of consumer confidence, high unemployment, and a further drop in consumer discretionary spending. These factors contributed to a downturn in auto sales.

8. Old GM was also burdened with significant structural costs, union restrictions, pension and healthcare obligations, an inefficient dealership network, and several failed brands.

9. These pressures and burdens resulted in Old GM facing a capital shortfall.

10. Old GM attempted to raise capital by selling certain business units and brands, including Saturn, Saab, Hummer, Opel, and AC Delco.

11. Old GM also explored a merger with Chrysler, but no such merger took place.

12. In April 2009, Old GM attempted a public exchange offer to provide equity to its outstanding bondholders. The public exchange offer announced in April 2009 was unsuccessful.

13. Between 2008 and June 30, 2009, Old GM engaged in certain unsuccessful attempts to secure private financing.

14. The price of Old GM's common stock declined from \$23.19 to \$0.75 per share from May 1, 2008 to May 29, 2009 (the last trading day before the June 1, 2009 filing of Old GM's Chapter 11 petition).

15. In its Form 10-Q filed on May 8, 2009, Old GM reported consolidated global assets of approximately \$82 billion and liabilities of approximately \$172 billion, as of March 31, 2009.

16. In its Form 10-Q filed on May 8, 2009, Old GM's reported total net revenue had decreased by 47.1% in the first quarter of 2009, as compared to the same period in 2008.

17. In late 2008, Old GM sought financial assistance from the United States Government.

18. In late 2008 and early 2009, the United States Government agreed to extend substantial financing to Old GM.

19. In late 2008 and through June 30, 2009, the United States and Canadian Governments were concerned that if Old GM had to cease operations, it would cause significant harm to the economy and exacerbate the financial crisis.

20. The United States Government implemented programs to assist the automotive industry through the U.S. Treasury and its Presidential Task Force on the Auto Industry pursuant to the Troubled Asset Relief Program ("**TARP**").

21. On December 31, 2008, the Government agreed to provide Old GM with a bridge loan of up to \$13.4 billion on a senior secured basis (the "**Treasury Prepetition Loan**") under TARP.

22. Old GM drew \$4 billion on that Treasury Prepetition Loan in December 2008. It then drew \$5.4 billion more, and the remaining \$4 billion on February 17, 2009.

23. On March 30, 2009, the President of the United States indicated that the United States Government would extend to Old GM adequate working capital for a period of another 60 days to enable it to continue operations, and that it would work with Old GM to develop and implement an appropriate viability plan.

24. On April 22, 2009, the United States Government and Old GM entered into amended credit agreements for the Treasury Prepetition Loan.

25. On April 24 2009, Old GM received a second TARP loan of \$2 billion.
26. On May 20, 2009, Old GM received a third TARP loan of \$4 billion.
27. Old GM had borrowed \$19.4 billion total from the Government by the end of May 2009.
28. As a condition to the TARP loans, Old GM was required to submit viability plans.
29. Old GM ultimately submitted five versions of its viability plan to the United States Government. The first four were rejected.
30. The United States Government accepted the fifth viability plan, Viability Plan 4B, which contemplated additional government funding in connection with a bankruptcy filing.

B. OLD GM'S CHAPTER 11 BANKRUPTCY CODE CASE AND THE 363 SALE

31. On June 1, 2009 (the "**Petition Date**"), Old GM and certain of its subsidiaries filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code in this Court.
32. On the Petition Date, Old GM also filed a motion in this Court seeking approval to sell substantially all of its assets to a Government-sponsored entity in an expedited sale under Section 363 of the Bankruptcy Code (the "**363 Sale**").
33. The Government-sponsored entity purchasing Old GM's assets was to be a new company, NGMCO, Inc. ("**New GM**"). The assets that New GM did not acquire would remain with Old GM, which was to be renamed Motors Liquidation Company.
34. Two of the Representative Assets, Representative Asset No. 29 (GG-1 Transfer Press) and Representative Asset No. 30 (TP-14 Transfer Press), were assets that were excluded from the 363 Sale, remained behind with Old GM, and were subsequently sold to third parties.
35. The other 38 Representative Assets, along with the plants in which they were operated, were included in the 363 Sale and were operated by New GM after the 363 Sale closed.

36. Pursuant to the 363 Sale, New GM agreed to provide 10% of the post-closing common shares of New GM, plus New GM warrants, to Old GM for the benefit of its unsecured creditors.

37. On the Petition Date, Old GM also filed a motion for debtor-in-possession (“**DIP**”) financing seeking immediate, interim postpetition financing up to a maximum aggregate amount of \$15 billion and final postpetition financing up to a maximum aggregate amount of \$33.3 billion.

38. On June 2, 2009, the Bankruptcy Court entered an order approving the DIP motion on an interim basis, permitting the Government to fund up to \$15 billion of the DIP loan.

39. On June 2, 2009, the Bankruptcy Court approved bidding procedures proposed by the Debtors, imposing a deadline of June 22, 2009, for any competing bids to the proposed 363 Sale. Pursuant to those procedures, market participants had an opportunity to bid to acquire substantially all of Old GM’s assets. If any bid was higher or better than the existing terms of the 363 Sale, then, subject to Bankruptcy Court approval, Old GM’s assets would be sold to that bidder.

40. No other bids for Old GM’s assets were submitted.

41. On June 25, 2009, the Court granted the Debtors’ motion to approve the final DIP financing from the U.S. Government (Dkt. No. 2529) (the “**Final DIP Order**”) and the U.S. Government provided an additional \$18.3 billion of DIP financing to Old GM.

42. On July 5, 2009, the Court approved the 363 Sale.

43. The 363 Sale closed on July 10, 2009.

C. THE TERM LOAN

44. Pursuant to a term loan agreement, dated as of November 29, 2006, and amended as of March 4, 2009 among Old GM, Saturn, JPMorgan as administrative agent, and a syndicate

of bank lenders (the “**Term Loan Credit Agreement**”), Old GM borrowed approximately \$1.5 billion.

45. As of June 1, 2009, interests in the Term Loan were held by over 500 Term Lenders.

46. JPMorgan was the administrative agent for the Term Loan.

47. To secure Old GM’s and Saturn’s obligations under the Term Loan, pursuant to a November 29, 2006 collateral agreement (the “**Term Loan Collateral Agreement**,” and collectively with the Term Loan Credit Agreement, the “**Term Loan Agreements**”), Old GM and Saturn granted to JPMorgan, as administrative agent for the Term Loan, a first-priority security interest in equipment, fixtures, documents, general intangibles, all books and records and their proceeds at 42 Old GM and Saturn facilities throughout the United States, plus certain related facilities (the parties dispute the scope of such related facilities) (the “**Collateral**”).

48. A UCC-1 financing statement was filed with the Secretary of State of Delaware, which perfected the Term Lenders’ security interest in all of the Collateral “now owned or at any time hereafter acquired” by Old GM and its affiliates (the “**Delaware Umbrella Financing Statement**”).

49. A separate UCC-1 financing statement was filed with the Secretary of State of Delaware, which perfected the Term Lenders’ security interest in all of the Collateral “now owned or at any time hereafter acquired” by Saturn and its affiliates (the “**Delaware Saturn Financing Statement**”).

50. The Term Loan Agreements contemplated that fixture filings would be filed in county real estate records (“**Fixture Filings**”) with respect to each of the “Material Facilities” in

the corresponding office of the County Clerk for the counties where the Material Facilities were located.

51. “Material Facilities” is defined in the Term Loan Credit Agreement as manufacturing facilities listed on Schedule 1 to the Term Loan Collateral Agreement where Collateral with a net book value of at least \$100,000,000 was installed or located.

52. Twenty-six Fixture Filings were made.

53. As of the Petition Date, the outstanding principal balance on the Term Loan was over \$1.4 billion.

54. Per the Final DIP Order, on June 30, 2009, Old GM paid \$1,481,656,507.70 to JPMorgan, which JPMorgan distributed to the Term Lenders, in full satisfaction of all claims arising under the Term Loan Agreements.

55. On July 31, 2009, the Committee filed the Avoidance Action.

56. On an appeal from a decision of the Bankruptcy Court in the Avoidance Action, the Second Circuit held that, on October 30, 2008, JPMorgan authorized the filing of a UCC-3 termination statement with the Delaware Secretary of State that referred to the Delaware Umbrella Financing Statement (the “**2008 Termination Statement**”).

57. The Second Circuit has also held that, as a result of the filing of the 2008 Termination Statement, the Delaware Umbrella Financing Statement was not effective as of the Petition Date.³

58. The filing of the 2008 Termination Statement did not affect any of the 26 Fixture Filings or the Delaware Saturn Financing Statement.

³ The Term Lenders reserve all rights with respect to their contention that the Second Circuit’s decision is not binding as to them.

D. THE EATON COUNTY FIXTURE FILING

59. A Fixture Filing was recorded on behalf of JPMorgan on April 26, 2007, in Eaton County, Michigan (the “**Eaton County Fixture Filing**”).

60. The Eaton County Fixture Filing lists Old GM as the debtor.

61. The Eaton County Fixture Filing describes the collateral covered by it as “all fixtures located on the real estate described in Exhibit A.”

62. Exhibit A to the Eaton County Fixture Filing, as it is filed in the Eaton County Register of Deeds office, includes the following:



LIBER 2113 PAGE 662

EXHIBIT A

8400 MILLETT HWY, LANSING TOWNSHIP, LANSING MI 48917-9549

S 1/2 SEC 28 LYING W OF W LINE HWY I-96/69, EXC NW 1/4 OF SW 1/4, AND EXC PARTS S & E OF LINE COM 100 FT W OF S 1/4 COR SAID SEC, TH N 50 FT, E 400 FT, N 25 FT, E 188.65 FT TO W LINE SAID HWY R/W & POE, EXC LANDS USED FOR GUNIEA RD & MILLETT HWY; 144 ACRES +/-; SEC 28 T4N R3W

**GM Assembly Lansing Delta
8400 Millett Hwy
Lansing, Easton County, MI
LandAmerica File No. 100729**

63. The metes and bounds description in Exhibit A to the Eaton County Fixture filing describes a vacant parcel of land across the street to the North of the Lansing Facilities.

64. The parcel described in the metes and bounds description in Exhibit A of the Eaton County Fixture Filing is denoted in a red outline on Adv. Pro. Dkt. No. 827 Ex. 1, a sketch plan of the metes and bounds description jointly commissioned by the parties.

65. The street addresses for the Lansing Facilities include 8175 Millett Highway, Lansing, MI and 8001 Davis Highway.

E. REPRESENTATIVE ASSETS NOS. 32 AND 33

66. Defendants do not claim a security interest in Representative Asset No. 32 (AA Transfer Press) and Representative Asset No. 33 (B3-5 Transfer Press) under the Term Loan Agreements.

F. THE CENTRAL UTILITIES COMPLEX

67. Representative Asset No. 11, the Central Utilities Complex (the “CUC”), is subject to three agreements relating to the CUC’s construction, financing, maintenance, and use: (a) the Utility Services Agreement between Delta Township Utilities II, LLC (“**Delta II**”) and Old GM – Worldwide Facilities Group, dated April 14, 2004 (the “**USA**”); (b) the Tri-Party Agreement by and among Delta II, as debtor, GMAC Commercial Holding Capital Corp. (together with its successors in interest, “**GMAC**”), as lender, and Old GM, dated as of April 14, 2004 (the “**Tri-Party Agreement**”); and (c) the Loan and Security Agreement by and between GMAC, as lender, and Delta II, as debtor, dated as of April 14, 2004 (the “**LSA**” and collectively with the USA and the Tri-Party Agreement, the “**CUC Agreements**”).

68. As of June 1, 2009, any security interest Defendants had in the CUC was subject to the lien created by the CUC Agreements.

G. MFD PONTIAC/POWERTRAIN ENGINEERING PONTIAC

69. Article II(a) of the Collateral Agreement grants Defendants a security interest in all fixtures located at “any plant or facility of [GM] listed on Schedule 1, including all related or appurtenant land, buildings, Equipment and Fixtures.”

70. The Metal Fabricating Division (Stamping) Pontiac facility (“**MFD Pontiac**”) is listed as one of the 42 facilities on Schedule 1 of the Term Loan Collateral Agreement, and is a Material Facility for which a Fixture Filing was filed.

71. Defendants have a perfected security interest in any fixtures at MFD Pontiac.

72. GM Powertrain Engineering Pontiac (“**Powertrain Engineering Pontiac**”) is not listed on Schedule 1 of the Collateral Agreement.

H. VALUATION DATE

73. June 30, 2009, the date the Term Loan was repaid in full, is the date as of which the Representative Assets are to be valued.

I. DESCRIPTION OF THE 40 REPRESENTATIVE ASSETS

74. Representative Asset No. 1, the OP-150 Select, Check Place Shims Auto Station, which is located at Warren Transmission, is a shim select and placement machine. The asset measures transmission housings to ensure they conform to design tolerances and selects and installs a thin piece of metal, or “shim,” with the specific thickness needed to adjust for any detected intolerance. The asset was put into service in June 2006 and had an installed cost of \$467,741.

75. Representative Asset No. 2, General Assembly Pits & Trenches, which is located at the Lansing Facilities, consists of various pits and trenches required for installation of certain machinery and equipment used in the general assembly of vehicles, including several conveyors. The asset was put into service in July 2006 and had an installed cost of \$2,307,597.

76. Representative Asset No. 3, Power Zone Roller Conveyor Automation TCH MOD 3, which is located at Warren Transmission, is a powered conveyor system that moves rough transmission housing castings through a number of Computer Numerically Controlled, or “CNC,” milling machines that mill the housings to GM’s specifications and then delivers the milled housings to smoothing and testing machines. The asset was put into service in February 2007 and had an installed cost of \$1,053,051.

77. Representative Asset No. 4, Paint Building Lines – Process Waste ELPO, which is located at the Lansing Facilities, is the waste processing system for the Electro-coat Paint Operation, or ELPO system. This asset consists of a system of trenches, piping, and pumps that carries liquid waste from the ELPO process to the waste treatment facility at the Central Utilities Complex. The asset was put into service in April 2006 and had an installed cost of \$935,780.

78. Representative Asset No. 5, Paint Mix & Circulation – Electrical, which is located at the Lansing Facilities, is a paint mix and circulation electrical system that consists of electrical distribution and control cabinets that support the paint mixing and circulation equipment for the paint shop. The asset was put into service in November 2006 and has an installed cost of \$1,899,672.

79. Representative Asset No. 6, Paint Dip Conveyor – ELPO Oven IMC, which is located at the Lansing Facilities, is a conveyor system that carries vehicle bodies through the Electro-coat Paint-curing Operation, or ELPO, process. The conveyor spans all three operating levels of the paint shop and transports vehicle bodies through the ELPO system’s curing ovens. The asset was put into service in November 2006 and had an installed cost of \$1,107,185.

80. Representative Asset No. 7, Paint Top Coat Automation Software, which is located at the Lansing Facilities, is software that controls the operation of the primer and top coat

/ clear coat conveyors and paint process equipment, such as Representative Asset No. 9 the TC2 CC Bell Zone. The asset was put into service in November 2006 and had an installed cost of \$200,000.

81. Representative Asset No. 8, General Assembly End of Line Paint Spot Reprocess System Paint Mix Room, which is located at the Lansing Facilities, is a self-contained paint mixing room located inside the general assembly area. It is used as a vented enclosure to mix small batches of paint for minor paint repairs to vehicle bodies at the end of the final assembly line. The asset was put into service in November 2006 and had an installed cost of \$815,150.

82. Representative Asset No. 9, Paint TC2 CC Bell Zone, which is located at the Lansing Facilities, is a set of paint applicator machines or “Bells” mounted overhead or installed through the walls of one of the spray booths in the paint shop. The Bells apply a clear coating to the sides, front, top, and back of a vehicle body as one of the final steps in the paint process. The asset was put into service in November 2006 and had an installed cost of \$2,805,703.

83. Representative Asset No. 10, Opticell – Robotic Measurement System, which is located at the Lansing Facilities, is an OptiCell robotic measuring system that uses white light scanning technology to check a sampling of the finished stamped metal panels for quality assurance purposes. The asset includes the robot itself and the robotic transportation unit on which the robot slides. (Defendants believe that the associated safety fencing was included in GM’s fixed asset ledger as part of this asset; Plaintiff believes that the associated safety fencing was not included in GM’s fixed asset ledger as part of this asset). The asset was put into service in March 2006 and had an installed cost of \$630,726.

84. Representative Asset No. 11, Lansing Delta Township Assembly Utility Services, which is located at the Lansing Facilities, is the “CUC” for the Lansing Facilities. The asset

includes the building itself, as well as the water, air, heating, processing and electric systems contained within it. The asset was put into service in April 2006 and had an installed cost of \$73,997,467.

85. Representative Asset No. 12, Body Shop Robot LAZN-150R1, which is located at the Lansing Facilities, is a framing robot that is installed on an overhead structure. The robot is one of a number of robots in the outer body framing station in the body shop that apply spot welds to join together body panels into a complete vehicle body outer frame. The asset was put into service in November 2006 and had an installed cost of \$27,526.

86. Representative Asset No. 13, Body Shop Weld Bus Ducts, which is located at the Lansing Facilities, consists of the electric power distribution weld bus ducts for the welding operations in the body shop. The weld bus ducts deliver electrical power to body shop equipment, such as robot mounted weld guns and other weld equipment. The bus ducts are installed overhead throughout a large portion of the body shop. The asset was put into service in July 2006 and had an installed cost of \$3,993,837.

87. Representative Asset No. 14, Leak Test Base Machine Qty = 1, which is located at Warren Transmission, is a leak test machine that tests for fluid leaks in transmission housings after they have been manufactured and before they are sent to the transmission assembly line. This asset was put in service in July 2007 and had an installed cost of \$1,254,458.

88. Representative Asset No. 15, General Assembly Tire/Wheel: Soap; Mount and Inflate, which is located at the Lansing Facilities, is a tire and wheel assembly system that assembles tires and wheels into finished wheel and tire assemblies by applying soap to lubricate the tires and wheels, mounting the tires to the wheels, and inflating the tires. The asset was put into service in November 2006 and had an installed cost of \$1,897,124.

89. Representative Asset No. 16, Body Shop Skid Conveyor – LAZA, which is located at the Lansing Facilities, is a skid conveyor system that includes the conveyor itself and the mezzanine. (Defendants believe that the support steel was included in GM's fixed asset ledger as part of this asset; Plaintiff believes that the support steel was not included in GM's fixed asset ledger as part of this asset). This conveyor transports skids carrying complete vehicle body frames from the end of the outer framing line, where the outer body frames are welded to the inner body structures, to the start of the area where doors, hoods, lift gates and fenders are added. The asset was put into service in November 2006 and had an installed cost of \$2,495,283.

90. Representative Asset No. 17, Body Shop Power and Free Conveyor – Body Side Inner LH DEL, which is located at the Lansing Facilities, is an overhead power and free conveyor system that includes the conveyor itself and the mezzanine structure. (Defendants believe that the support steel was included in GM's fixed asset ledger as part of this asset; Plaintiff believes that the support steel was not included in GM's fixed asset ledger as part of this asset). The conveyor transports complete inner body subassemblies for the left side of the vehicle to the inner body framing station, where they are joined to other inner body frame components. The asset was put into service in November 2006 and had an installed cost of \$1,649,074.

91. Representative Asset No. 18, General Assembly Conveyor: Vertical Adjusting Carrier (VAC) Sys – Carriers (Qty 87), which is located at the Lansing Facilities, is a set of 87 vertical adjusting carriers that travel along an overhead rail, which is part of a separate eFast ledger line. The carriers transport vehicle bodies through the chassis assembly line, which is

where the suspension and vehicle powertrains are attached to the vehicle bodies. The asset was put into service in November 2006 and had an installed cost of \$4,141,896.

92. Representative Asset No. 19, Body Shop Coordinate Measuring Machine Full Body Machine – LY90, which is located at the Lansing Facilities, was a Full Body Coordinate Measuring Machine, or a CMM. The machine was used to take precise measurements of auto bodies manufactured in the body shop for quality purposes. The asset was put into service in November 2006 and had an installed cost of \$354,000. It was removed in 2015. The other Full Body CMM installed in the same room is similar in size and installation to Representative Asset No. 19.

93. Representative Asset No. 20, General Assembly Conveyor Sub-ASM Receiving (SAR): WTD1000 – Wheel & Tire Delivery, which is located at the Lansing Facilities, is a conveyor system that transports wheel and tire assemblies from the tire and wheel assembly system to the final assembly line. The asset was put into service in November 2006 and had an installed cost of \$1,150,919.

94. Representative Asset No. 21, General Assembly Conveyor: Skillet-Final-Leg 1, which is located at the Lansing Facilities, is a skillet conveyor system that transports nearly complete vehicles on skillets through the final assembly process. The asset was put into service in November 2006 and had an installed cost of \$1,484,980.

95. Representative Asset No. 22, Fanuc M-710IB/70T Robot – Assembly, which is located at Warren Transmission, is a Fanuc robot mounted on a gantry rail. The asset is used to move gears within a subassembly process before the finished gears are sent to the transmission assembly line. (Defendants believe that the associated safety fencing and interlocks were included in GM's fixed asset ledger as part of this asset; Plaintiff believes that the safety fencing

was not included in GM's fixed asset ledger as part of this asset.) The asset was put into service in July 2007 and had an installed cost of \$270,101.

96. Representative Asset No. 23, Aluminum Machining System, which is located at Warren Transmission, is an aluminum machining system that is connected to Computer Numerically Controlled, or "CNC," machines. The asset includes the piping that circulates clean, temperature controlled coolant to the CNC machines and also removes metal chips generated during the CNC milling process from the coolant so the coolant can be recirculated to the CNC machining centers. The asset was put into service in June 2006 and had an installed cost of \$1,946,878.

97. Representative Asset No. 24, LFS220 Base Shaping Machine-Op 20 Transfer Drive Gear, which is located at Warren Transmission, is a Base Shaping Machine, which is a type of Computer Numerically Controlled, or "CNC," machine that is part of the process of machining or cutting steel blanks into transfer gears that are used in GM transmissions. The asset was put into service in December 2007 and had an installed cost of \$1,050,540.

98. Representative Asset No. 25, Liebherr Hobb Machine from St. Catharines, which is located at Warren Transmission, is a hobb machine manufactured by Liebherr. It is another type of Computer Numerically Controlled, or "CNC," machine and is part of the process of machining or cutting steel blanks into transmission gears that are used in GM transmissions. The asset was moved from GM's St. Catharines, Ontario facility to Warren Transmission in 2008. It had an installed cost of \$1,192,377.

99. Representative Asset No. 26, Core Delivery Conveyor System CB116 & 122, which is located at GM Powertrain Defiance, is a conveyor system and associated support platform that transports engine core sub-assemblies as part of the iron casting process at

Powertrain Defiance. The asset was put into service in November 2007 and had an installed cost of \$280,816.

100. Representative Asset No. 27, Emissions System #4 Cupola, which is located at GM Powertrain Defiance, is a gas cleaning system that heats the hot blast air injected into the No. 4 melting furnace at Powertrain Defiance (also known as a “cupola”) and removes and controls particulates and toxic gases generated by those foundry melting. The asset replaced an earlier system that served a similar function, Representative Asset No. 38, the System Gas Cleaning No. 4 Cupola. The asset was put into service in November 2007 and had an installed cost of \$9,811,712.

101. Representative Asset No. 28, 100 Ton Vertical Channel Holding Furnace, which is located at GM Powertrain Defiance, is a furnace that holds molten iron at a stable temperature until the mold line at Powertrain Defiance requires the molten iron. The asset was put into service in December 2007 and had an installed cost of \$4,174,288. The asset was removed in 2011.

102. Representative Asset No. 29, Transfer Press-GG-1, which was located at GM Metal Fabricating Division (MFD) Grand Rapids, is a transfer press that processes sheet metal blanks through a series of two rams that transform the metal using large dies to produce finished automotive body parts. The asset was put into service in September 1989 and had an installed cost of \$11,340,238. The GG-1 press was left with Old GM and not included in the 363 sale. It was sold by Maynards and Hilco in 2010.

103. Representative Asset No. 30, TP-14 CS1-1 Transfer Press Danly ET-2, which was located at GM Metal Fabricating Division (MFD) Mansfield, is a transfer press that processes metal coil through a single ram that transforms the metal using large dies to produce finished

automotive body parts. The asset was put into service in September 1987 and had an installed cost of \$4,636,106. The TP-14 press was left with Old GM and not included in the 363 sale. It was sold by Maynards and Hilco in 2011.

104. Representative Asset No. 31, Danly 4000 Ton Press, which is located at the Lansing Facilities, is a Danly 4000 ton press. This press is currently used to test or “tryout” dies, which are the tools used in the production presses to stamp sheet metal into specific shapes. The asset was originally put into service in October 1980 at the GM Indianapolis stamping plant to make truck body components and had an installed cost of \$2,729,407. It was moved to Delta Township in 2003.

105. Representative Asset No. 32, AA-11 Schuler No. 1 AA Crossbar Transfer Press, which is located at the Lansing Facilities, is an AA transfer press manufactured by Schuler. This press processes sheet metal blanks through a series of five rams that transform the metal using large dies to produce finished automotive body parts. The asset was put into service in September 2003 and had an installed cost of \$33,767,895.

106. Representative Asset No. 33, B3-5 Transfer Press System Incl. Destacker and End of Line, which is located at the Lansing Facilities, is a B3-5 transfer press system manufactured by IHI, which includes the press itself, the destacker/feeder that feeds the metal into the press, and an end-of-line system that removes the stamped parts from the press. This press system processes sheet metal blanks through a series of three rams that transform the metal using large dies to produce finished automotive body parts. The asset was put into service in December 2003 and had an installed cost of \$27,682,072.

107. Representative Asset No. 34, Build Line W/ Foundation, which is located at Warren Transmission, was an assembly line used for producing four-speed transmissions. The

foundation in which the asset was installed is a fixture. (The parties disagree over whether the foundation is part of the Representative Asset or part of a separate eFast ledger line). The build line with foundation was put into service in December 1983 and had an installed cost of \$3,580,522. After the four-speed transmission line stopped manufacturing transmissions, the assembly line was removed and the foundation was filled in.

108. Representative Asset No. 35, Button up and Test Conveyor System, which is located at Warren Transmission, is a conveyor system that moves transmissions through the final leg of the transmission assembly and testing process. The asset was put into service in June 2006 and had an installed cost of \$2,689,706.

109. Representative Asset No. 36, Helical Broaching Equipment, which is located at Warren Transmission, is a type of Computer Numerically Controlled, or “CNC,” machine used to cut gear teeth on a steel gear blank for use in GM transmissions. The asset was put into service in June 2006 and had an installed cost of \$1,472,023.

110. Representative Asset No. 37, Courtyard Enclosure, which is located at Warren Transmission, is an enclosure that is currently being used for part storage. The asset was put into service in December 1982 and had an installed cost of \$8,384,325.

111. Representative Asset No. 38, System Gas Cleaning No. 4 Cupola, which is located at GM Powertrain Defiance, is a gas cleaning system that cleaned high-temperature exhaust gases from a cupola at Powertrain Defiance. The asset was put into service in May 1976 and had an installed cost of \$1,173,272. The asset was idled in 2007.

112. Representative Asset No. 39, CB 91 Robot, is a robot that unloads engine cores from the CB 91 core making machine. The asset delivers each core to several work stations before delivering a complete core sub-assembly to a conveyor for further processing. The sub-assemblies are used later in the iron casting process at Powertrain Defiance. The asset was put into service in March 2005.

113. Asset No. 40, P&H 7 1/2 Ton Charger Crane 6E Cupola, which is located at GM Powertrain Defiance, consists of a seven-and-a-half-ton capacity charging bridge crane, suspended above the ground, that moves along rails (which were part of a separate eFast ledger line) within a raw material bay at Powertrain Defiance. As part of the iron casting process, the asset picks up raw scrap metal from rail cars with a magnet and brings the metal to one of the charging feeders for Defiance's cupolas. The asset was put into service in July 1997 and had an installed cost of \$639,653.

J. FIXTURE CLASSIFICATION AGREEMENTS BETWEEN THE PARTIES

114. The parties agree that Representative Asset No. 2, the Pits and Trenches at Lansing Delta Township, is a fixture.

115. The parties agree that Representative Asset No. 4, the ELPO Process Waste Lines at Lansing Delta Township, is a fixture.

116. The parties agree that a portion of Representative Asset No. 11, the CUC, consists of ordinary building materials, which are not fixtures.

117. The parties agree that the following components of Representative Asset No. 11, the CUC at Lansing Delta Township, are fixtures: (a) the utility piping in the CUC; (b) the hard electrical conduit in the CUC; (c) the air handling units; (d) a chilled water holding tank; (e) three batch wastewater holding tanks; and (f) a sludge holding tank.

118. The parties agree that the pits, trenches, and piping that are components of Representative Asset No. 23, the Aluminum Machining System, are fixtures.

V. ORDER OF PRESENTATION AT TRIAL

The parties have agreed that Defendants shall present their witnesses first at the Representative Assets Trial. To the extent that Plaintiff is calling a witness that Defendants are also calling, Plaintiff shall take its direct testimony of that witness immediately following or as part of its cross-examination.

The parties do not believe that opening statements are necessary in light of the pretrial briefs previously submitted to the Court. The parties will, however, be guided by the Court, and if the Court would find opening arguments helpful, the parties agree that such openings shall be no more than 30 minutes per side with Defendants offering any opening statement first.

The parties have agreed that Defendants will present their closing argument last.

Subject to the Court's approval, Defendants also believe that, in the interest of facilitating the clearest presentation of evidence to the Court, at the Representative Assets Trial the parties should first present each side's witnesses on the issues related to collateral identification (Issues to be Tried (a), (c), (d), and (e) in Section VII below), and then present each side's witnesses on the issues related to valuation (Issue to be Tried (b) in Section VII below). Plaintiff believes that the issues will be best presented without bifurcation, and propose Defendants present their case in full, followed by Plaintiff's case.

VI. PARTIES' CONTENTIONS

For purposes of the Representative Assets Trial, except as set forth herein, the pleadings are deemed amended to embrace the following, and only the following, contentions of the parties.⁴

A. DEFENDANTS' CONTENTIONS

1. Set forth is a brief statement of Defendants' contentions as to the ultimate issues of fact and law to be tried at the Representative Assets Trial, as set forth more fully in Defendants' Pretrial Brief (Dkt. No. 876):

Defendants' Contentions Regarding the Fixture Status of the 40 Representative Assets

2. General Motors manufactures automobiles in massive plants that were constructed or extensively renovated to accommodate sophisticated machinery and equipment engineered and installed to work together in concert.

3. The 40 Representative Assets at issue in the Representative Assets trial were used by General Motors to do just that — work efficiently as part of integrated systems to produce automobiles.

4. General Motors designed its plants and processes to be flexible to changing designs, standards and consumer demand precisely to avoid having to move or replace fixed assets as its needs changed.

⁴ For the reasons discussed below, Defendants do not consent to any amendment of Plaintiff's pleadings to raise any challenge to the perfection of Defendants' security interest in the fixtures at the Lansing Facilities. It is Plaintiff's position that, as set out below, the argument with regard to the Eaton County Fixture Filing falls squarely within the Amended Complaint.

The parties reserve all rights to raise any issue not addressed at the Representative Assets Trial following the Representative Assets Trial.

5. General Motors' automotive manufacturing machinery and equipment, including the Representative Assets, are generally so massive that it is generally impractical to move them, absent extraordinary circumstances.

6. The Representative Assets, like many of General Motors' manufacturing assets, were generally required to be firmly attached to the realty in order to function properly and safely.

7. Given these facts, assets like the Representative Assets were very rarely moved by General Motors — even in extraordinary circumstances — and even more rarely outside of extraordinary circumstances.

8. Under Michigan and Ohio law, property is a fixture if (a) it is annexed to the realty, whether the annexation is actual or constructive; (b) its adaptation or application to the realty being used is appropriate; and (c) there is an intention to make the property a permanent accession to the realty.

9. Under Michigan law, there is a presumption that assets that are attached by the owner of the land are intended to be permanent, and it is the intent of the owner at the time of installation that matters.

10. Under Michigan and Ohio law, permanence is not equated with perpetuity, and it is sufficient if an asset is intended to remain where affixed until worn out, until the purpose to which the realty is devoted is accomplished, or until the asset is superseded by another asset more suitable for the purpose.

11. Defendants' contentions with respect to the fixture test are discussed in detail in Defendants' Pretrial Brief.

12. The evidence at the Representative Assets Trial will show that 38 of the Representative Assets are fixtures, and that the two other Representative Assets have components that are fixtures.

13. In particular, the evidence will show that Representative Assets 1-10, 12-36, and 38-40 are fixtures. As noted above, the parties have stipulated that Representative Asset No. 2 and Representative Asset No. 4 are fixtures, and that Representative Asset No. 23 is partly a fixture (Defendants contend it is entirely a fixture).

14. In addition to those 38 Representative Assets, with respect to Representative Asset 11 (the LDT Central Utilities Complex), the parties have stipulated that a number of components are fixtures. Defendants also contend that additional non-building components of Representative Asset 11 are also fixtures, including: (a) a number of liquid pumps; (b) the electrical power distribution system; (c) the compressed air system; (d) the chilled water system; (e) the hot water system; (f) the water treatment system; and (g) the wastewater treatment system.

15. Finally, with respect to Representative Asset 37, the Courtyard Enclosure at Warren Transmission, Defendants contend that certain non-building components of the asset are fixtures, including: (a) dock doors and levelers; (b) hot water tanks; (c) lighting transformers; and (d) the fire safety system.

16. Defendants' contentions as to whether the 40 Representative Assets are fixtures and what their value is are summarized in the chart after the next section below.

17. The Court should reject the fixture approach advanced by Plaintiff and its expert, Mr. Goesling, which is contrary to numerous Michigan and Ohio cases. Applying Plaintiff's approach, virtually none of the machinery and equipment installed in GM plants for the purpose

of manufacturing automobiles would be fixtures, and the only assets that Plaintiff would classify as fixtures would have no value at all if removed from the plant. This is contrary to Michigan and Ohio cases holding that assets similar or identical to the Representative Assets are fixtures.

Defendants' Contentions Regarding the Valuation of the Representative Assets

18. The Representative Assets should be valued "in light of the purpose of the valuation and of the proposed disposition or use of such property" 11 U.S.C. § 506(a)(1).

19. The proposed disposition of 38 of the Representative Assets as of the June 30, 2009 Valuation Date was to be sold in the 363 Sale from Old GM to New GM for continued use, in place, in manufacturing automobiles.

20. The actual disposition of those same 38 Representative Assets was their sale in the 363 Sale from Old GM to New GM for continued use, in place, in manufacturing automobiles.

21. Old GM's financial advisor, Evercore, estimated the total purchase price paid by New GM to Old GM in the 363 Sale to be between \$91.2 and \$93.6 billion.

22. The 363 Sale was an arm's length transaction that provided fair consideration to Old GM and was intended to preserve the going concern value of the GM enterprise, as recognized by GM, its advisors, the Court and the Creditors' Committee.

23. In the context of a post-bankruptcy asset sale like the 363 Sale, going concern value is applied to assets that are sold in bankruptcy as part of the business of a going concern.

24. Given the proposed disposition of 38 of the Representative Assets, going concern value should be used to value those 38 Representative Assets.

25. The best, indeed, a conservative, measure of going concern value for the Representative Assets sold to New GM is the Replacement Cost New Less Depreciation

(“**RCNLD**”) value assigned by KPMG to 34 of the Representative Assets in its contemporaneous “fresh start” valuation.

26. An alternative, acceptable measure of going concern value for the Representative Assets sold to New GM, and the best measure of going concern value for the 4 such Representative Assets KPMG did not value, is the fair market value in continued use at which Defendants’ expert, Carl Chrappa, appraised those assets.

27. As of June 30, 2009, the proposed disposition of Representative Asset 30, the TP-14 Press, and of Representative Asset 29, the GG-1 Press, was to remain with Motors Liquidation Company as part of closed or closing plants, and to be liquidated.

28. Given the proposed disposition of these two Representative Assets, orderly liquidation value should be applied to value these two assets.

29. The best measure of orderly liquidation value for these two assets is the orderly liquidation value at which Defendants’ expert, Carl Chrappa, appraised those assets.

30. Defendants’ contentions as to the value and fixture status of each of the 40 Representative Assets are summarized in the chart immediately below.

Summary Chart of Defendants’ Contentions Regarding Fixtures and Valuation

Rep. Asset #	Asset Description	Fixture Status of Asset	KPMG RCNLD Value	Chrappa Appraised Value
1	OP-150 Shims Station	Yes	207,000	345,000
2	Pits & Trenches	Yes	2,440,890	2,285,000
3	Power Zone Conveyor	Yes	553,000	825,000
4	Electro-Coat Paint Operations (“ELPO”) Waste System	Yes	989,600	890,000
5	Paint Circulation Electrical System	Yes	1,482,270	1,745,000

Rep. Asset #	Asset Description	Fixture Status of Asset	KPMG RCNLD Value	Chrappa Appraised Value
6	ELPO Oven Conveyor	Yes	964,420	930,000
7	Paint Top-Coat Software	Yes	61,400	145,000
8	General Assembly Paint Mix Room	Yes	636,000	750,000
9	Paint Top-Coat Bells	Yes	2,188,200	2,270,000
10	Opticell Robotic System	Yes	n/a	420,000
11	LDT Central Utilities Complex	In Part	51,210,000	64,770,000
12	Overhead Body Shop Welding Robot	Yes	19,210	18,100
13	Weld Bus Ducts	Yes	3,220,000	3,750,000
14	Leak Test Base Machine	Yes	629,000	810,000
15	Soap, Mount and Inflate System	Yes	1,402,500	1,715,000
16	Skid Conveyor	Yes	2,172,600	2,290,000
17	Power and Free Conveyor	Yes	1,439,520	1,445,000
18	Vertical Adjusting Carriers	Yes	3,579,400	3,600,000
19	Full Body Coordinate Measurement Machine (CMM)	Yes	274,000	285,000
20	Wheel & Tire Conveyor	Yes	1,000,100	970,000
21	Final Line Skillet Conveyor	Yes	1,287,000	1,235,000
22	Fanuc Gantry Robot	Yes	126,000	190,000
23	Aluminum Machining System	Yes	862,000	1,475,000
24	Base Shaping Machine	Yes	533,300	810,000
25	Liebherr Hobb Machine	Yes	591,000	965,000

Rep. Asset #	Asset Description	Fixture Status of Asset	KPMG RCNLD Value	Chrappa Appraised Value
26	Core Delivery Conveyor System	Yes	90,400	100,000
27	Emissions System	Yes	2,820,300	3,130,000
28	Holding Furnace	Yes	1,211,100	1,515,000
29	GG-1 Transfer Press	Yes	n/a	930,000 (OLV)
30	TP-14 Transfer Press	Yes	n/a	500,000 (OLV)
31	Danly Tryout Press	Yes	n/a	880,000
32	AA Transfer Press	Yes	n/a	27,860,000
33	B3-5 Transfer Press	Yes	n/a	22,455,000
34	Build Line w/ Foundation	Yes	142,000	100,000
35	Button Up Conveyor System	Yes	1,370,800	2,005,000
36	Helical Broach	Yes	653,430	1,080,000
37	Courtyard Enclosure	In Part	211,720	410,000
38	Gas Cleaning System	Yes	69,000	0
39	Core Box Robot	Yes	n/a	n/a ⁵
40	Charger Crane	Yes	114,000	160,000

**Defendants' Contentions Regarding the Capital Lease Asset, Representative
Asset No. 11, the Central Utilities Complex at Lansing Delta Township**

31. The components of the CUC that meet the “fixture” test, as discussed above, were assets in which Defendants had a security interest under the Term Loan Agreements, notwithstanding the existence of the CUC Agreements.

⁵ The parties have agreed that they will not present evidence on the value of Representative Asset 39, the Core Box Robot, at trial.

32. The CUC Agreements created a financing under which Old GM was the true or beneficial owner of the CUC and held a valuable residual interest in it.

33. Old GM's residual interest and rights in the CUC are not excluded from the scope of the Term Lenders' security interest by Article II, Clause (ii) of the Collateral Agreement. Article II, Clause (ii) of the Collateral Agreement excludes from the scope of the Term Lenders' security interest any assets that are "subject to a Lien permitted under clause (vii) of Section 6.0[2](b) of the [Term Loan] Credit Agreement" where the agreement creating the lien prohibits the creation of additional liens on the asset.⁶ To the extent Old GM's interest in the CUC was subject to a prior lien created by the CUC Agreements when the Term Loan was originated, such a lien was permitted by Section 6.02(b)(vii) of the Term Loan Credit Agreement. Moreover, the CUC Agreements do not prohibit GM from granting a security interest in its interest in the CUC. Accordingly, pursuant to Article II of the Collateral Agreement, Old GM was free to grant, and did grant, the Term Lenders a security interest in the CUC, to the extent of its interest and rights in the CUC.

34. Old GM's residual interest and rights in the CUC are also not excluded from the scope of the Term Lenders' security interest by Article II, Clause (iii) of the Collateral Agreement. Clause (iii) excludes from the scope of the Term Lenders' security interest any "asset[] consisting of rights under a contract, agreement, instrument, or other document," where the granting of a lien would constitute a default under such agreement, instrument, or other document. However, because Old GM was the true owner of the CUC as of June 1, 2009, Old GM's interest in the CUC was not an "asset[] consisting of rights under a contract, agreement,

⁶ Due to a scrivener's error, Article II, Clause (ii) of the Term Loan Collateral Agreement refers to liens permitted under "clause (vii) of Section 6.01(b) of the Credit Agreement." However, Section 6.01(b) of the Term Loan Credit Agreement does not contain a clause (vii).

instrument or other document.” Even if Old GM’s interest in the CUC is an “asset[] consisting of rights under a contract, agreement, instrument or other document,” such grant of security interest was not prohibited by the CUC Agreements.

35. Clauses (ii) and (iii) of Article II of the Collateral Agreement therefore do not apply to the CUC.

36. Defendants further contend that even if Article II, Clauses (ii)-(iii) of the Collateral Agreement did apply to the CUC, the CUC would still not be excluded from the scope of the Term Lenders’ security interest. Article II excludes certain property subject to legal or contractual restrictions on Old GM’s ability to encumber it. However, Article II specifically provides that this exclusion does not apply where any such legal or contractual restriction is “ineffective under applicable law.” Collateral Agreement, Art. II. Under sections 9-407 and 9-408 of the Michigan U.C.C., *see* M.C.L. §§ 440.9407, 440.9408, the contractual provisions in the CUC Agreements purporting to restrict Old GM’s ability to encumber the CUC are ineffective. Therefore the CUC is not excluded from the scope of the Term Lenders’ security interest under Article II of the Collateral Agreement.

**Defendants’ Contentions Regarding Plaintiff’s Challenge to Defendants’
Security Interest in the Fixtures at the Lansing Facilities**

37. The Lansing Facilities are an integrated GM assembly plant that is commonly referred to at GM by the name, “Lansing Delta Township.” The stamping and body shop areas of Lansing Delta Township share one large building on the site with no interior walls between the two areas. The paint shop and general assembly area are in two additional buildings, with all of the buildings connected by conveyors that automatically carry vehicle bodies from the stamping/body shop building, to the paint shop, and then to the general assembly building. All of the buildings are served by a single Central Utilities Complex that provides utility services to

the entire Lansing Delta Township plant, including electrical power; hot, chilled and domestic water; treated water; steam, compressed air; and wastewater treatment.

38. Article II of the Term Loan Collateral Agreement granted the Defendants a lien on the fixtures at Lansing Delta Township. Both “GM Assembly Lansing Delta Township” and “GM MFD Lansing Regional Stamping” are expressly listed on Schedule 1 to the Term Loan Collateral Agreement. Plaintiff, however, contends that Defendants’ lien was not perfected by the Eaton County Fixture Filing because the Eaton County Fixture Filing contains a metes and bounds description that corresponds to a vacant lot on the Lansing Delta Township property.

39. Because Plaintiff’s contentions concerning the Eaton County Fixture Filing amount to an attempt to avoid Defendants’ lien on the fixtures at Lansing Delta Township on the grounds that the Eaton County Fixture Filing failed to perfect that lien, Plaintiff bears the burden of proof on its claim that the Defendants’ lien on the fixtures at Lansing Delta Township is unperfected.

40. As noted above, Defendants first contend that Plaintiff’s challenge to the perfection of Defendants’ conceded security interest at Lansing Delta Township is time-barred, and therefore contest and do not agree to any amendment of Plaintiff’s pleadings to raise that issue at this date.

41. Plaintiff has been on notice since filing its initial complaint in July 2009, and certainly no later than JPMorgan’s answer to Plaintiff’s initial complaint in 2010, that Defendants claim a perfected security interest in the fixtures at Lansing Delta Township based on a fixture filing made in the Eaton County, Michigan Register of Deeds office (the “Eaton County Fixture Filing,” as defined above).

42. Any proceeding to challenge the priority of Defendants' lien on the fixtures at Lansing Delta Township was required to be raised in Plaintiff's complaint, with a claim distinctly alleging sufficient facts that, if proven, would show that Plaintiff was entitled to relief.

43. Plaintiff never raised a challenge to the perfection of Defendants' undisputed lien on the fixtures at Lansing Delta Township based on the Eaton County Fixture Filing in a complaint, as required by Federal Rule of Bankruptcy Procedure 7001(2).

44. Any such challenge to the perfection of Defendants' lien on the fixtures at Lansing Delta Township is now time-barred by both the Final DIP Order, as well as the two-year statute of limitations under 11 U.S.C. § 546(a).

45. Second, even if the Court finds that Plaintiff's challenge to the perfection of Defendants' lien on the fixtures at Lansing Delta Township is not time-barred, Plaintiff has not met its burden of showing that Defendants' lien on the fixtures at Lansing Delta Township is unperfected.

46. The Eaton County Fixture Filing identified the Lansing Delta Township facility in bold-faced text.

47. The Eaton County Fixture Filing would have been identified by a diligent title searcher performing a title search on the Lansing Delta Township facility on June 1, 2009.

48. The Eaton County Fixture Filing therefore put third parties on actual, constructive, and inquiry notice of the Term Lenders' security interest in the fixtures at Lansing Delta Township, and thus perfected the Term Lenders' security interest in such fixtures.

Defendants' Contentions Regarding GM Powertrain Engineering Pontiac

49. The parties agree that, to the extent that Defendants held a security interest in the fixtures at GM Powertrain Engineering Pontiac under the Term Loan, Defendants' security interest in those fixtures was perfected as of June 1, 2009.

50. The Defendants were granted a security interest in the fixtures at GM Powertrain Engineering Pontiac pursuant to the Term Loan Agreements.

51. Article II(a) of the Collateral Agreement grants the Term Lenders a security interest in all fixtures located at “any plant or facility of [GM] listed on Schedule 1, including all related or appurtenant land, buildings, Equipment and Fixtures.”

52. GM MFD Pontiac is a plant or facility of GM listed on Schedule 1.

53. The land on which GM Powertrain Engineering Pontiac is located is related to GM MFD Pontiac because, among other things, the facilities are next to one another, were mapped on the same tax parcel at all relevant times, and title to that shared parcel was transferred in a single deed of conveyance on multiple occasions.

54. GM Powertrain Engineering Pontiac and GM MFD Pontiac are also related because, among other things, they were both actually used by Old GM, the area of land on which both facilities are located has been treated by Old GM for decades as the “Pontiac Campus,” the two facilities shared a single central utility complex that provided utilities to both facilities, and GM treated the Pontiac Campus as a single unit in union negotiations.

B. PLAINTIFF’S CONTENTIONS

1. Set forth is a brief statement of Plaintiff’s contentions as to the ultimate issues of fact and law to be tried at the Representative Assets Trial, as set forth more fully in Plaintiff’s Pretrial Brief [Dkt. No. 903].

Term Lender Defendants

2. Set forth in Exhibit A are the Term Lenders whom Plaintiff contends received a postpetition transfer of funds on June 30, 2009.

**Plaintiff's Contentions Regarding the Classification
and Value of Each Representative Asset**

3. The three-part fixture test followed in both Michigan and Ohio is a context-specific test that requires consideration of all of the relevant objective facts concerning each of the Representative Assets. Such a fact-based approach makes sense in light of the nature of fixtures: personal property that has become so “related to particular real property” as to become part of it. *See* N.Y. U.C.C. § 9-102(a)(41). Goods remain as personal property unless specific, objective facts about the relationship between the good and the realty suggest otherwise.

4. This Court should reject the bright-line approach advanced by Defendants as inconsistent with the approaches adopted by Michigan and Ohio courts. Under both Michigan and Ohio law, there is no short cut for concluding whether manufacturing machinery and equipment are fixtures.

5. In order to be classified as a fixture, an asset must meet all three prongs of the test: (1) annexation; (2) adaptation; and (3) intent to make the asset a permanent accession to the realty.

6. With respect to the third prong, which tends to be given the most weight, the annexor's intent to attach an asset permanently is determined based on objective facts and manifestations of intent, not the subjective or “secret” intent of the annexor. The pivotal question in fixture analysis is whether the party intended the assets to become “accessions” to the realty thereby allowing the interest in the assets to be merged with the interest in the realty, not whether the party intended to leave the asset physically in place.

7. Courts recognize that the test cannot be whether a company would like, at the time of installation, to keep the asset in service until the machine is obsolete or the plant ceases operation because the same statement could be made about any piece of equipment.

8. The following objective facts, among others, reveal Old GM's intent to treat most of the Representative Assets as personal property, not fixtures that are merged with the interest of the realty: (1) contemporaneous agreements, including leases, that show GM intended to keep assets as personal property; (2) GM's sale of similar assets as personal property on a bill of sale and separate from the realty; (3) GM's treatment of the Representative Assets as personal property for purposes of its tax filings; and (4) the attachment of the Representative Assets in such a way as to allow for their removal without damage and the actual removal or movement of the Representative Assets or similar assets.

9. Plaintiff's contentions with respect to each part of the test, including Ohio's approach to the adaptation prong of the test, are discussed in detail in Plaintiff's Pretrial Brief.

10. Below is a chart that summarizes Plaintiff's contentions regarding classification of each Representative Asset as a fixture or non-fixture, as well as Plaintiff's values for each Representative Asset.

Rep. Asset #	Asset Description	Fixture Status	Value (\$)
1	Shim Select and Placement Machine	No	3,000
2	Pits & Trenches	Yes	0
3	Torque Converter Housing Conveyor System	No	3,000
4	ELPO Process Waste Lines	Yes	0
5	Paint Mix and Circulation Electrical System	No	152,000
6	ELPO IMC System	No	7,000
7	TC Automation Software	No	0
8	Paint Mix Room	No	82,500
9	Paint TC2 CC Bell Zone	No	263,400

Rep. Asset #	Asset Description	Fixture Status	Value (\$)
10	OptiCell Measuring System	No	73,000
11	Central Utilities Complex	Yes/No	2,367,000 ⁷
12	BS Framing Robot	No	25,000
13	BS Weld Bus Duct	No	681,000
14	Leak Test System	No	9,000
15	Wheel Assembly Machine	No	59,000
16	BS Skid Conveyor	No	15,000
17	BS P&F Conveyor	No	24,000
18	Vertical Adjusting Carriers	No	59,000
19	BS CMM	No	39,000
20	Wheel & Tire Delivery Conveyor	No	5,000
21	Skillet Conveyor System	No	1,000
22	Robot Gantry System	No	32,000
23	Coolant Filtration System	Yes/No	14,000 ⁸
24	CNC Gear Shaper	No	224,000
25	Gear Hobber	No	244,000
26	Core Delivery Conveyor System	No	1,000
27	Cupola No. 4 Emissions System	No	131,000
28	Ajax 100 Ton Holding Furnace	No	8,000
29	GGI Clearing Transfer Press	No	261,000

⁷ Plaintiff's contended value includes the aggregated value of both the fixture and non-fixture components of Representative Asset No. 11.

⁸ Plaintiff's contended value includes the aggregated value of both the fixture and non-fixture components of Representative Asset No. 23.

Rep. Asset #	Asset Description	Fixture Status	Value (\$)
30	TP-14 Danly Transfer Press	No	800,000
31	Danly Tryout Press	No	276,000
32	Schuler Transfer Press	No	3,675,000
33	B3-5 Transfer Press	No	2,400,000
34	4 Speed Build Line	No	45,000
35	Button Up and Test Conveyor	No	2,000
36	Helical Broach	No	150,000
37	Courtyard Enclosure	No	0 ⁹
38	Gas Cleaning System	No	24,000
39	CB91 Unload Robot	No	N/A ¹⁰
40	P & H Charger Crane	No	10,000

Plaintiff's Contentions Regarding the Valuation of the Representative Assets

11. Plaintiff contends that the Representative Assets should be valued “in light of the purpose of the valuation and of the proposed disposition or use of such property, and in conjunction with any hearing on such disposition or use or on a plan affecting such creditor’s interest.” 11 U.S.C. § 506(a)(1) (2016).

12. Plaintiff contends that the proposed disposition of the Representative Assets was to be sold in the 363 Sale.

⁹ Because Representative Asset No. 37, the Courtyard Enclosure, is real estate, Plaintiff has not assigned a value to it.

¹⁰ The parties have agreed that they will not present evidence on the value of Representative Asset 39, the CB91 Unload Robot, at trial.

13. Plaintiff contends that the Representative Assets should be valued at their fair market value in the hands of the debtor, Old GM, as of June 30, 2009. Plaintiff contends that the fair market value of the Representative Assets is the amount Old GM would command for those assets in an open and competitive market as of the Valuation Date, which is the value of those assets in liquidation.

14. Plaintiff contends that valuing the Representative Assets in liquidation is consistent with § 506(a)(1) because it provides Defendants the highest actual market value for the Representative Assets in light of their proposed disposition.

15. Plaintiff contends that as of the Valuation Date, Old GM did not have value as a going concern. Old GM's prepetition efforts to secure private financing to continue operations and its extensive efforts to sell its operations or to merge with another automotive manufacturer all failed. No commercial market participant was willing to pay any amount for Old GM's assets as part of a going concern. The only value that Old GM could obtain for its assets was through a liquidation, and it is on that basis that the Representative Assets are properly valued. No commercial actor would have paid more than the liquidation value to obtain the Representative Assets (or any assemblage of Old GM's assets) in the market because they were not worth anything more.

16. Plaintiff contends that the premise of value that would yield the highest actual market value for the Representative Assets is what appraisers refer to as "orderly liquidation value in exchange." This valuation premise is appropriate because, given the absence of a market for a sale of these Representative Assets as part of a going concern, their market value can only be determined by considering their value if they had been removed and sold in market transactions.

17. Plaintiff contends that the 363 Sale provides no basis for valuing the Representative Assets or the Surviving Collateral because it does not represent the fair market value of the assets. Old GM was kept alive only by virtue of an enormous Government subsidy, and it was only because of this subsidy that New GM was able to operate at all after the 363 Sale. That subsidy, included in the price paid by New GM in the 363 Sale, provided Old GM with benefits far in excess of the value of the assets purchased, and was determined based on the Company's needs rather than what the company's assets were worth. The Government bailout was predicated on the willingness of the Government to inject huge sums into a failing company to keep the U.S. economy intact, avoid exacerbating the financial crisis, avoid the loss of U.S. jobs, avoid the impact of an Old GM failure on the rest of the automotive industry, and to avoid harming states and municipalities who relied on the automotive industry for revenue. These are motivations that no ordinary market participant would have.

18. New GM was able to continue as a going concern *only* because of the Government's enormous subsidy, and not because the Surviving Collateral had any value beyond liquidation value.

Plaintiff's Contentions Regarding Representative Asset No. 11

19. Plaintiff contends that Representative Asset No. 11 (Asset ID 100045909), the CUC, is not Surviving Collateral. This asset is subject to a capital lease and was not owned by Old GM as of June 1, 2009. Therefore, Old GM did not grant JPMorgan a security interest in the asset.

20. Plaintiff contends that any interests Old GM had in the CUC as of June 1, 2009 also is excluded from the grant of a security interest. Clause (iii) of Article II of the Collateral Agreement excludes assets that are assets consisting of rights under a contract where such contract prohibits the creation of additional liens on the asset. Plaintiff contends that any

interests Old GM had in the CUC was as an asset consisting of rights under contracts. Plaintiff further contends that the CUC Agreements prohibit the creation of additional liens on the asset. Section 5.01(f) of the Tri-Party Agreement prohibits Old GM from creating a lien on any interest in the CUC. Section 7.01(g)(vi) of the LSA also prohibits the creation of liens on any interest in the CUC.

21. Plaintiff contends that even if the CUC was owned by Old GM as of June 1, 2009, it is excluded from the grant of a security interest by clause (ii) of Article II of the Collateral Agreement. Plaintiff further contends that any interest Old GM had in the CUC also was excluded from the grant of a security interest by clause (ii). Clause (ii) excludes assets that are subject to a lien permitted by Section 6.02(b)(vii) of the Term Loan Agreement, where the agreement creating the lien prohibits the creation of additional liens on the asset. Plaintiff further contends that the CUC Agreements prohibit the creation of additional liens on the asset.

22. Plaintiff contends that even if Defendants had a security interest in the CUC, and even if they had a perfected security interest in the CUC, such interest is subordinate to GMAC's first-priority interest in the asset. As of June 1, 2009, GMAC had a perfected, first priority security interest in the CUC as a result of the filing of the Delta II Fixture Filing (filed before the Eaton County Fixture Filing) and the Delta II Continuation Statement.

**Plaintiff's Contentions Regarding Assets Located at
GM Powertrain Engineering Pontiac**

23. Plaintiff contends that Defendants do not have a security interest in fixtures located at the Powertrain Engineering Pontiac facility.

24. The Collateral Agreement excludes from the grant of collateral all "Equipment" and "Fixtures" that are not located at a "U.S. Manufacturing Facility." "U.S. Manufacturing Facility" is defined in pertinent part as the 42 facilities listed on Schedule 1 to the Collateral

Agreement, including any “related or appurtenant” land, buildings, equipment and fixtures.

Plaintiff contends that Powertrain Engineering Pontiac is not “related” or “appurtenant” to MFD Pontiac.

25. MFD Pontiac and Powertrain Engineering Pontiac have two different addresses and are located on opposite sides of the street. The street separating MFD Pontiac and Powertrain Engineering Pontiac is on a piece of land that Old GM deeded to the City of Pontiac, Michigan in 2008 to develop for public use. They do not share site entrances, parking lots, or security gates. Unlike, MFD Pontiac, Powertrain Engineering Pontiac is not a manufacturing facility. MFD Pontiac and Powertrain Engineering Pontiac do not share any operational functions, are not physically connected, have different testing facilities, and have different storage areas. MFD Pontiac and Powertrain Engineering Pontiac do not share management, employees, human resources personnel, or plant managers.

Plaintiff’s Contentions Regarding Assets Located at the Lansing Delta Township and Lansing Regional Stamping Facilities

26. Plaintiff contends that there are no assets located at either the Lansing Delta Township Assembly or Lansing Regional Stamping facilities that are subject to a Fixture Filing.

27. Plaintiff contends that the Eaton County Fixture Filing does not cover any fixtures located at either the Lansing Delta Township Assembly or Lansing Regional Stamping facilities. The Eaton County Fixture Filing, on its face, does not pertain to either facility. Neither the address nor the metes and bounds description in the Eaton County Fixture Filing include the Lansing Delta Township Assembly plant or the Lansing Regional Stamping plant.

28. Nor does the description on the Eaton County Fixture Filing provide constructive notice to a bona fide purchaser that Defendants have a secured interest in either the Lansing Delta Township Assembly plant or the Lansing Regional Stamping plant. Plaintiff contends that

the Eaton County Fixture Filing unambiguously refers to the empty lot (which was also owned by Old GM) as the covered collateral: It describes the covered collateral as “all fixtures located on the real estate described in Exhibit A,” and Exhibit A contains the address and the metes and bounds description that match the empty lot.

29. Plaintiff contends that the stamp located below the metes and bounds and address description in Exhibit A to the Eaton County Fixture Filing appears to have been made by LandAmerica, the title insurance company that handled the Eaton County Fixture Filing. Plaintiff contends that the stamp represents an internal filing system for the title company and should be disregarded in this analysis. Plaintiff contends that the stamp does not contain the legal, formal, or official name of either the Lansing Delta Township Assembly or the Assembly Lansing facilities.

30. Plaintiff contends that the Eaton County Fixture Filing was recorded in the real property records of the vacant lot and not the real property records of the Lansing Delta Township Assembly or the Lansing Regional Stamping facilities. If a bona fide purchaser searched the land records for the parcels where the Lansing Delta Township Assembly and the Lansing Regional Stamping facilities are located, the purchaser would not have uncovered the Eaton County Fixture filing.

31. Plaintiff contends that constructive notice, not inquiry notice, is the correct standard for notice.

32. Plaintiff contends that under either standard of notice (constructive or inquiry), the Eaton County Fixture Filing is insufficient to perfect a security interest at either the Lansing Delta Township Assembly or the Lansing Regional Stamping plants.

33. Plaintiff contends that even if the Court concludes that Defendants have a perfected security interest in the fixtures located at Lansing Delta Township Assembly, Defendants do not have a perfected security interest in the fixtures located at the Lansing Regional Stamping plant.

34. Plaintiff contends that it is not precluded from showing that Defendants did not have a perfected security interest in the fixtures located at the Lansing Delta Township Assembly or the Lansing Regional Stamping plants. The Final DIP Order provided that the Committee (and now the Trust) had automatic standing to bring actions challenging the perfection of first priority liens. In the Amended Complaint, Adv. Pro. Dkt. No. 91, Plaintiff asserts a claim that due to the termination of the Delaware Financing Statement, Defendants did not perfect their first priority lien, and that they were entitled to be paid only to the extent of the value of any collateral as to which they can demonstrate a perfected first priority security interest. The argument with regard to the Eaton County Fixture Filing falls squarely within these borders: Plaintiff contends that no collateral is covered by the Eaton County Fixture Filing, and thus Defendants do not have a perfected first-priority lien with regard to any collateral at the Lansing Delta Township Assembly or the Lansing Regional Stamping facilities. The issues concerning the Eaton County Fixture Filing fall within Defendants' general burden to prove what is included in their surviving collateral.

VII. ISSUES TO BE TRIED

Pursuant to the Order Amending the August 17, 2015 "Order Regarding Discovery and Scheduling" to Provide for Proceedings Concerning Characterization and Valuation of Representative Assets, dated May 4, 2016 (ECF No. 547) (the "May 4, 2016 Order") and the Stipulation and Order Amending and Superseding Certain Prior Orders Regarding Discovery and

Scheduling, dated December 2, 2016 (the “December 2, 2016 Order”), the following issues are to be tried at the Representative Assets Trial:

- a. Whether each of the 40 Representative Assets is a fixture.
- b. What principles should be applied in valuing the 40 Representative Assets, as of June 30, 2009, and what was the value of each Representative Asset as of June 30, 2009.¹¹
- c. Whether Representative Asset No. 11, the CUC, is a fixture in which the Defendants had a perfected security interest as of June 1, 2009;
- d. Whether Defendants had a perfected security interest in the fixtures at the Lansing Facilities as of June 1, 2009 and whether Plaintiff’s challenge to the Defendants’ security interest in the fixtures at the Lansing Facilities is time-barred;
- e. Whether Defendants had a perfected security interest in the fixtures at GM Powertrain Pontiac Engineering facility, as of June 1, 2009.

VIII. JOINT EXHIBITS

The parties Joint Exhibits are set forth in Exhibit B.

IX. DEFENDANTS’ EXHIBITS

Defendants’ Exhibits are set forth in Exhibit C.

X. PLAINTIFF’S EXHIBITS

Plaintiff’s Exhibits are set forth in Exhibit D.

* * *

¹¹ The parties have agreed that they will not present evidence on the value of Representative Asset 39, the Core Box Robot, at trial, and that the Court does not need to decide the value of Representative Asset 39.

No exhibit not listed by Plaintiff or Defendants may be used at trial, except (a) for cross-examination purposes or (b) if good cause for its exclusion from the pretrial order is shown. Each side has listed all exhibits it intends to offer on its case in chief and the lists include each party's description of each exhibit.

All exhibits are pre-marked with each exhibit bearing a unique number, with the prefix PX for Plaintiff's exhibits, DX for Defendant's exhibits, and JX for joint exhibits.

Two copies of each exhibit will be delivered to Chambers on April 7, 2017, in accordance with the December 2, 2016 Scheduling Order.

The parties shall comply with the March 31, 2017 Stipulation and [Proposed] Order Permitting the Parties to File Trial Exhibits and Deposition Designations Under Seal (ECF 916) regarding exhibits marked Confidential or Outside Attorneys' Eyes Only under the Amended Agreed Protective Order by a party or third party.

XI. STIPULATIONS AND OBJECTIONS WITH RESPECT TO EXHIBITS AND DEPOSITION DESIGNATIONS

Any objections not set forth herein will be considered waived, absent good cause shown.

Plaintiff's objections to Defendants' Exhibits are set forth in Exhibit C hereto, where applicable.¹²

Defendants' objections to Plaintiff's Exhibits are set forth in Exhibit D hereto, where applicable.

¹² Defendants note that Plaintiff has objected to a number of summary exhibits Defendants are submitting pursuant to FRE 1006 to avoid burdening the Court with the voluminous material underlying the summary exhibits. Defendants have listed documents that were used in compiling the summaries on a provisional exhibit list as set forth in Exhibit F. Defendants will provide the Court with these voluminous materials if Plaintiff's objection is not consensually resolved.

The parties stipulate to the admissibility of all designated deposition testimony (as discussed below) and all documents produced by parties or third parties in this litigation that are identified on the parties' exhibit lists, except that the parties do not waive:

- a. objections on grounds that the designated testimony and documents are irrelevant, incomplete, or cumulative;
- b. objections that are the subject of pending motions in limine and the responses thereto;
- c. objections to documents on hearsay-within-hearsay grounds, which all parties reserve the right to assert at trial; and
- d. all objections as to the following documents: PX0070, PX0199, PX0200, PX0201, PX204, PX207, DX-0083 through DX-0093, DX-136, DX-1017, and DX-1018.

For the avoidance of doubt, this stipulation does not include expert reports, documents produced from expert files or expert work product that was produced in this litigation. To the extent that an exhibit is a summary exhibit under Rule 1006 of the Federal Rules of Evidence and is based on documents produced by parties or third parties in this litigation subject to this stipulation, the parties agree not to object to such summary exhibit on grounds precluded by this stipulation but reserve all other objections.

XII. DEFENDANTS' WITNESS LIST

Defendants intend to call the following witnesses in their case in chief at the Representative Assets Trial¹³:

- a. Martin Apfel
- b. Don Benson
- c. John Buttermore
- d. Carl Chrappa
- e. Daniel Deeds
- f. Jay Ewing
- g. Patrick Furey
- h. R. Glenn Hubbard
- i. Maryann Keller
- j. Abdul Lakhani
- k. James Marquardt

¹³ Plaintiff objects to the inclusion of Martin Apfel and Jay Ewing on Defendants' witness list. Those individuals from New GM, who Plaintiff understands are outside the Court's subpoena power, were not included in Defendants' Rule 26(a) disclosures and were not deposed. Defendants added these witnesses to their witness list yesterday evening.

Defendants respond that, on February 16, 2017, the parties agreed in writing to exchange "preliminary witness lists" "on a without-prejudice basis" on March 3, 2017, and then to "[e]xchange updates to witness lists" on March 30, 2017. Defendants complied with this express agreement. Defendants' addition of Messrs. Apfel and Ewing was in direct response to Plaintiff's overbroad Motions in Limine challenging the admission of the KPMG Fresh-Start Accounting, which were only filed on March 8, 2017 after the initial exchange of witness lists. On March 22, 2017, in the *Term Lenders' Memorandum in Opposition to Avoidance Trust's Motions to Exclude the KPMG Report et al.*, Defendants specifically identified Messrs. Apfel and Ewing as individuals who had provided information to KPMG used in the fresh start report, then stated expressly that "the Term Lenders are also prepared to call former GM employees who provided information to KPMG to address any objection that has not been overruled or resolved."

- l. Max Miller
- m. Ronald Pniewski
- n. Eric Stevens
- o. Randy Thayer
- p. John Thomas
- q. Steven Topping
- r. Donald Wannemacher
- s. J. Stephen Worth
- t. Any custodians of records or other witnesses necessary to qualify documents into evidence, if the parties cannot reach agreement on authentication or admissibility of particular exhibits.

Defendants intend to call the following additional witnesses by deposition designation at the Representative Assets Trial:

- a. Matthew Feldman
- b. Raymond Fulcher
- c. Albert Koch
- d. Robert Levy
- e. Jeff Niszcza
- f. Gregory Miocic
- g. G. Mustafa Mohaterem
- h. Sharon Sheremet
- i. Taso Sofikitis
- j. Richard Starzecki

k. Kevin Voigt

l. Jennifer Weigel

Defendants reserve the right to call any witness called by Plaintiff at trial. Defendants also reserve the right to call these, or other witnesses, in rebuttal to plaintiff's case in chief.

XIII. PLAINTIFF'S WITNESS LIST

Plaintiff intends to call the following witnesses in its case in chief at the Representative Assets Trial:

a. Ram Burshtine

b. John Buttermore

c. John Crabtree

d. Dan Deeds

e. Richard Duker

f. Daniel Fischel

g. David Goesling

h. Gordon Klein

i. Max Miller

j. Robert Mollhagen

k. Mike Regiec

l. Randy Thayer

m. Don Wannemacher

n. Stephen Worth

- o. Any custodians of records or other witnesses necessary to qualify documents into evidence, if the parties cannot reach agreement on authentication or admissibility of particular exhibits.

Plaintiff intends to call the following additional witnesses by deposition designation at the Representative Assets Trial:

- a. Matthew Feldman
- b. Raymond Fulcher
- c. Albert Koch
- d. Robert Levy
- e. Jeff Niszcza
- f. Taso Sofikitis
- g. Jennifer Weigel

Plaintiff intends to submit the testimony of the following additional witnesses by declaration at the Representative Assets Trial, as stipulated by the parties:

- a. Harry Wilson

Plaintiff reserves the right to call any witness called by Defendants at trial.

* * *

The witnesses listed may be called at trial. No witness not identified herein, except for those subject to the reservations above, shall be permitted to testify on either party's case in chief, absent good cause shown.

The parties' designations of deposition testimony are attached hereto as Exhibit E, along with each party's objections to any such deposition testimony and the basis therefor.

The parties shall comply with the March 31, 2017 Stipulation and [Proposed] Order Permitting the Parties to File Trial Exhibits and Deposition Designations Under Seal (ECF 916) regarding designations marked Confidential or Outside Attorneys' Eyes Only under the Amended Agreed Protective Order by a party or third-party.

XIV. RELIEF SOUGHT

At the Representative Assets Trial, Defendants respectfully request a ruling from the Court that:

- a. The 40 Representative Assets are fixtures (except Representative Asset 11, the Lansing Delta Township CUC, which is in significant part a fixture, and Representative Asset 37, the Courtyard Enclosure, which is in part a fixture).
- b. The 38 Representative Assets sold by Old GM to New GM should be valued on a going-concern basis.
- c. The 34 assets valued by KPMG on a RCNLD basis should be valued in accordance with the RCNLD values established by KPMG as set out in "Defendants' Contentions" above.
- d. The 4 assets that were not valued by KPMG on a RCNLD basis should be valued in accordance with the values established by Defendants' expert, Carl Chrappa, as set out in "Defendants' Contentions" above.
- e. The 2 Representative Assets that were not sold by Old GM to New GM should be valued on an orderly liquidation basis in accordance with the values established by Mr. Chrappa, as set out in "Defendants' Contentions" above.

- f. Defendants had a perfected security interest in Representative Asset 11, the Lansing Delta Township CUC, notwithstanding the capital financing lease to which the CUC is subject.
- g. Plaintiff's challenge to Defendants' security interest in the fixtures at the Lansing Facilities is time-barred.
- h. In the alternative, Defendants' security interest in the fixtures at the Lansing Facilities was perfected as of June 1, 2009.
- i. Defendants had a perfected security interest in fixtures at GM Powertrain Engineering Pontiac as of June 1, 2009.

At the Representative Assets Trial, Plaintiff respectfully requests a ruling from the Court that:

- a. The Representative Assets be classified in accordance with Plaintiff's position as described in "Plaintiff's Contentions" above.
- b. Any Representative Assets the Court determines are fixtures be valued in accordance with Plaintiff's expert valuation opinion based upon a liquidation value in exchange premise of value.
- c. Asset No. 11, the CUC, is not collateral for the Term Loan.
- d. There is no collateral in which Defendants had a perfected security interest at the GM Powertrain Engineering Pontiac facility.
- e. There is no collateral in which Defendants had a perfected security interest at the Lansing Delta Township Assembly facility and the Lansing Regional Stamping facility.

Dated: New York, New York
March 31, 2017

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*Attorneys for Defendants Arrowgrass Master Fund
Ltd., et al.*

Dated: _____

IT IS SO ORDERED:

Martin Glenn
UNITED STATES BANKRUPTCY JUDGE

Exhibit A

**Term Lenders Whom Plaintiff Contends Received
a Postpetition Transfer of Funds on June 30, 2009**

1. Advent Global Opportunity Master Fund
2. Alticor Inc.
3. American International Group, Inc.
4. APG Fixed Income Credits Pool
5. APG Investments US Inc. A/C Stichting Pensionfonds ABP
6. Arch Reinsurance Ltd.
7. Ares Enhanced Loan Investment Strategy III, Ltd
8. Ares IIR/IVR CLO Ltd.
9. Ares IX CLO Ltd.
10. Ares VIII CLO Ltd.
11. Ares VIR CLO Ltd.
12. Ares VR CLO Ltd.
13. Ares XI CLO Ltd.
14. Arrowgrass Master Fund Ltd.
15. Atrium IV
16. Atrium V
17. Avery Point CLO, Limited
18. Ballyrock CLO 2006-2 LTD
19. Ballyrock CLO II Limited
20. Ballyrock CLO III Limited
21. Baltic Funding LLC
22. Bank of America, N.A.
23. Barclays Bank, PLC
24. BBT Fund, L.P.
25. BBT Master Fund, L.P.
26. Bentham Wholesale Syndicated Loan Fund, f/k/a Credit Suisse Syndicated Loan Fund
27. Big Sky III Senior Loan Trust
28. Bill & Melinda Gates Foundation Trust
29. Black Diamond CLO 2005-1 Ltd.
30. Black Diamond CLO 2005-2 Ltd.
31. Black Diamond CLO 2006-1 Cayman Ltd.
32. Black Diamond International Funding, Ltd.
33. BlackRock Corporate High Yield Fund, Inc.
34. BlackRock Debt Strategies Fund, Inc.
35. BlackRock Debt Strategies Fund, Inc.
36. BlackRock Floating Rate Income Strategies Fund, Inc.
37. BlackRock Global Investment Series: Income Strategies Portfolio
38. BlackRock GSAM Goldman Core Plus Fixed Income Fund
39. BlackRock High Yield Bond Portfolio, a series of BlackRock Funds II (June 8, 2007)
40. BlackRock Met Investors Series Trust High Yield Portfolio
41. BlackRock Multi-Strategy Fixed Income Alpha (Offshore) Fund
42. BlackRock Senior Income Series IV
43. BlackRock-Lockheed Martin Corp Master Retirement Trust

44. Board of Fire and Police Pension Commissioners of the City of Los Angeles
45. Board of Pensions of the Presbyterian Church (U.S.A.)
46. Board of Retirement of the San Diego County Employees Retirement Association
47. BTG Pactual Chile S.A. Administradora General De Fondos
48. Building Trades United Pension Trust Fund
49. California State Teachers' Retirement System
50. Canyon Capital CDO 2002-1 Ltd.
51. Capital Research-American High Income Trust
52. Carpenters Pension Fund of Illinois
53. Castle Garden Funding
54. Caterpillar Inc. Pension Master Trust
55. Chatham Light II CLO, Limited
56. Citibank, N.A.
57. Citigroup Financial Products Inc.
58. City of Milwaukee Employees' Retirement System
59. City of Oakland Police & Fire Retirement System
60. Classic Cayman B D Ltd.
61. Coca-Cola Company Retirement & Master Trust
62. Columbus Unconstrained Bond Fund (formerly Reams Unconstrained Bond Fund)
63. Connecticut General Life Insurance Company In Respect of Its Separate Account 4828CP
64. Continental Casualty Company
65. Credit Suisse Loan Funding LLC
66. Crescent Senior Secured Floating Rate Loan Fund LLC
67. CSAA Insurance Exchange
68. Cummins Inc. and Affiliates Collective Investment Trust
69. Dallas Employee Retirement Fund
70. Debello Investors LLC
71. Delaware Core Plus Bond Fund, a series of Delaware Group Government Fund
72. Delaware Corporate Bond Fund, a series of Delaware Group Income Funds
73. Delaware Diversified Income Fund, a series of Delaware Group Adviser Funds
74. Delaware Diversified Income Trust
75. Delaware Dividend Income Fund, a series of Delaware Group Equity Funds V
76. Delaware Enhanced Global Dividend and Income Fund
77. Delaware Extended Duration Bond Fund, a series of Delaware Group Income Funds
78. Delaware High-Yield Opportunities Fund, a series of Delaware Group Income Funds
79. Delaware High-Yield Opportunities Fund, a series of Delaware Group Income Funds, f/k/a Delaware Delchester Fund, a series of Delaware Group Income Funds in 2009
80. Delaware Investments Divident and Income Fund, Inc.
81. Delaware PSEG Nuclear LLC Master Decommissioning Trust
82. Delaware VIP Diversified Income Series, a series of Delaware VIP Trust
83. Delaware VIP High-Yield Series, a series of Delaware VIP Trust
84. Deutsche Bank AG
85. Deutsche Bank AG Cayman Island Branch
86. Drawbridge Special Opportunities Fund LP; Drawbridge Special Opportunities Fund Ltd.
87. Eaton Vance CDO IX Ltd.

88. Eaton Vance CDO VIII Ltd
89. Eaton Vance CDO X PLC
90. Eaton Vance Floating Rate Income Trust
91. Eaton Vance Floating Rate Portfolio, f/k/a Eaton Vance Grayson & Co.
92. Eaton Vance Institutional Senior Loan Fund
93. Eaton Vance International (Cayman Islands) Floating Rate Income Portfolio, f/k/a Eaton Vance Medallion Floating Rate Income Portfolio
94. Eaton Vance Limited Duration Income Fund
95. Eaton Vance Loan Opportunities Fund, Ltd.
96. Eaton Vance Senior Floating-Rate Trust
97. Eaton Vance Senior Income Trust
98. Eaton Vance Short Duration Diversified Income Fund
99. Eaton Vance VT Floating-Rate Income Fund
100. Eighth District Electrical Pension Fund
101. Emerson Electric Co. Retirement Master Trust
102. Employees' Retirement System of Baltimore County
103. Employees Retirement System of the City of Montgomery
104. Employees' Retirement System of the City of Montgomery
105. Employers Insurance Company of WAUSAU
106. Evergreen VA High Income Fund
107. Fairway Loan Funding Company
108. FIAM Floating Rate High Income Commingled Pool
109. FIAM High Yield Fund, LLC
110. Fidelity Advisor Series I: Fidelity Advisor Floating Rate High Income Fund
111. Fidelity Advisor Series I: Fidelity Advisor High Income Advantage Fund
112. Fidelity Advisor Series II: Fidelity Advisor Strategic Income Fund
113. Fidelity Central Investment Portfolios LLC: Fidelity Floating Rate Central Fund
114. Fidelity Central Investment Portfolios LLC: Fidelity High Income Central Fund 2
115. Fidelity School Street Trust: Fidelity Strategic Income Fund
116. Fidelity Summer Street Trust: Fidelity Capital & Income Fund
117. Fidelity Summer Street Trust: Fidelity High Income Fund
118. Fire & Police Employees' Retirement System of the City of Baltimore
119. First Trust Senior Floating Rate Income Fund II
120. First Trust/Four Corners Senior Floating Rate Income Fund
121. Foothill CLO I, Ltd.
122. Four Corners CLO II, Ltd.
123. Four Corners CLO III, Ltd.
124. Freescale Semiconductor, Inc.; Freescale Semiconductor Inc. Retirement Savings
125. General Electric Capital Corporation
126. General Electric Pension Trust
127. Genesis CLO 2007-1 Ltd.
128. Genesis CLO 2007-2 Ltd.
129. GMAM Investment Funds Trust
130. Golden Knight II CLO, Ltd.
131. GoldenTree Loan Opportunities III, Ltd.
132. GoldenTree Loan Opportunities IV, Ltd.

133. Goldman Sachs Lending Partners LLC
134. Gracie Credit Opportunities Master Fund LP
135. Grand Central Asset Trust Wam Series
136. Guggenheim High Yield Fund
137. Guggenheim Portfolio Company X, LLC
138. Gulf Stream – Compass CLO 2007 Ltd.
139. Gulf Stream – Sextant CLO 2007-1 Ltd.
140. Gulf Stream Compass CLO 2003-1 Ltd.
141. Halliburton Company Employee Benefit Master Trust
142. Health Care Foundation of Greater Kansas City
143. High Yield Bond Fund, a series of 525 Market Street Fund LLC
144. High Yield Bond Portfolio
145. Highland Credit Opportunities CDO, Ltd.
146. Highland Floating Rate Fund
147. Houston Police Officers' Pension System
148. IBM Personal Pension Plan Trust
149. Illinois Municipal Retirement Fund
150. ILWU/PMA Pension Plan Trust
151. Immigon Portfolioabbau ag
152. Indiana Public Retirement System
153. Indiana State Police Pension Trust
154. Indiana University
155. Inter-Local Pension Fund of the Graphic Communications Conference of the International Brotherhood of Teamsters
156. International Paper Company Commingled Investment Group Trust
157. Iowa Public Employees Retirement System
158. Ivy Funds, on behalf of its series, Ivy High Income Fund
159. Jersey Street CLO, Ltd.
160. John Hancock Funds II - Floating Rate Income Fund
161. John Hancock Funds II High Yield Bond Fund
162. John Hancock Variable Insurance Trust - Floating Rate Income Trust
163. John Hancock Variable Insurance Trust High Yield Trust (f/k/a John Hancock Variable Insurance Trust - U.S. High Yield Bond Trust)
164. JPMorgan Chase Bank, N.A.
165. JPMorgan Whitefriars Inc.
166. Katonah 2007-1 CLO Ltd.
167. Katonah III, Ltd.
168. Katonah IV, Ltd.
169. Kraft Heinz Foods Company & Kraft Foods Master Retirement Trust
170. Kynikos Opportunity Fund II, L.P.
171. Kynikos Opportunity Fund International Limited
172. Kynikos Opportunity Fund, L.P.
173. Legg Mason ClearBridge Capital & Income Fund
174. Loan Funding XI LLC
175. Logan Circle - Alameda Contra Costa Transit Retirement System
176. Logan Circle - Allina Health Sys Defined Bnft Master Tr

177. Logan Circle – Allina Health System Trust
178. Logan Circle - Liberty Mutual Employee Thrift Incentive Plan
179. Logan Circle – Sunoco Inc. Master Retirement Trust
180. Logan Circle Freddie Mac Foundation Inc.
181. Logan Circle Peoples Energy Corporation Pension Trust
182. Logan Circle Wisconsin Public Service Corporation Pension Trust
183. Lord Abbett Investment Trust - Floating Rate Fund
184. Los Angeles Department Water and Power Employees' Retirement, Disability and Death Benefit Insurance Plan
185. LVIP Delaware Bond Fund, a series of Lincoln Variable Insurance Products Trust
186. LVIP Delaware Foundation Conservative Allocation Fund, a series of Lincoln Variable Insurance Products Trust (and the successor to LVIP Delaware Managed Fund)
187. MacKay 1028-Arkansas Public Employee Retirement System
188. MacKay Shields Short Duration Alpha Fund
189. Madison Park Funding I Ltd.
190. Madison Park Funding II Ltd.
191. Madison Park Funding III Ltd.
192. Madison Park Funding IV Ltd.
193. Madison Park Funding V Ltd.
194. Madison Park Funding VI Ltd.
195. Marathon CLO I Ltd.
196. Marathon CLO II Ltd.
197. Marathon Financing I, B.V.
198. Mariner LDC
199. Marlborough Street CLO, Ltd.
200. Mason Capital L.P.
201. Mason Capital Ltd.
202. Master Trust for Certain Tax Qualified Bechtel Retirement Plans, f/k/a Master Trust for Certain Tax-Qualified Retirement Plans of Bechtel
203. Master Trust for Certain Tax Qualified Bechtel Retirement Plans, f/k/a Master Trust for Certain Tax-Qualified Retirement Plans of Bechtel Corporation
204. Master Trust Pursuant to the Retirement Plans of APL Limited & Subsidiaries
205. Mather Foundation
206. Mayport CLO, Ltd.
207. Merrill Lynch Capital Services, Inc.
208. Metropolitan West High Yield Bond Fund
209. MFS Charter Income Trust
210. MFS Intermarket Income Trust I
211. MFS Intermediate High Income Fund
212. MFS Meridian Funds - Global High Yield Fund
213. MFS Multimarket Income Trust
214. MFS Series Trust III on behalf of MFS Global High Yield Fund
215. MFS Series Trust III on behalf of MFS High Income Fund
216. MFS Series Trust VIII on behalf of MFS Strategic Income Fund
217. MFS Series Trust XIII on behalf of MFS Diversified Income Fund
218. MFS Special Value Trust

- 219. MFS Variable Insurance Trust II on behalf of MFS High Yield Portfolio
- 220. MFS Variable Insurance Trust II on behalf of MFS Strategic Income Portfolio
- 221. Microsoft Global Finance Ltd.
- 222. Momentum Capital Fund Ltd.
- 223. Montana Board of Investments
- 224. Morgan Stanley Senior Funding Inc.
- 225. Mt. Wilson CLO II, Ltd.
- 226. Mt. Wilson CLO Ltd.
- 227. Municipal Employees' Retirement System of Michigan
- 228. Muzinich & Company (Ireland) Ltd. for the Account of Muzinich Loan Fund Plus
- 229. Napier Park Distressed Master Fund Ltd.
- 230. Nash Point CLO
- 231. National City Bank
- 232. Neuberger Berman High Income Bond Fund (f/k/a Lehman Brothers High Income Bond Fund)
- 233. Neuberger Berman High Yield Strategies Fund Inc. (f/k/a Lehman Brothers First Trust Income Opportunity Fund)
- 234. Neuberger Berman Income Opportunity Fund, Inc.
- 235. New Orleans Carpenters Pension Plan f/k/a Louisiana Carpenters Regional Council Pension Plan
- 236. New York Life Insurance Company
- 237. New York Life Insurance Company, through account bearing name New York Life Insurance Company GP - Portable Alpha
- 238. New York Life Insurance Company, through account bearing name New York Life Insurance Company Guaranteed Products
- 239. New York Life Insurance Company, through accounts bearing name New York Life Insurance Company Guaranteed Products
- 240. North Dakota State Investment Board
- 241. Northern Trust Global Advisors, Inc., as Named Fiduciary to the Central States, Southeast, and Southwest Areas Pension Fund
- 242. Oak Hill Credit Partners V Ltd.
- 243. Oaktree High Yield Fund II, L.P.
- 244. Oaktree High Yield Fund, L.P.
- 245. Oaktree High Yield Plus Fund, L.P.
- 246. Oaktree Loan Fund 2X (Cayman), L.P.
- 247. Oaktree Loan Fund, LP
- 248. Oaktree Senior Loan Fund, L.P.
- 249. OCM High Yield Trust
- 250. Octagon Investment Partners XI Ltd.
- 251. Ohio Police & Fire Pension Fund
- 252. Optimum Fixed Income Fund, a series of Optimum Fund Trust
- 253. OW Funding Ltd.
- 254. Pacific Gas and Electric VEBA
- 255. PAPS High Yield Portfolio
- 256. Pension Inv Committee of GM for GM Employees Domestic Group Pension Trust
- 257. PG&E Corporation Retirement Master Trust

- 258. Phoenix CLO II, Ltd.
- 259. Phoenix Edge Series Fund Phoenix Multi Sector Short Term Bond Series
- 260. Phoenix Edge SRS-Multi-Sector Fixed Income Series
- 261. Pimco Cayman Bank Loan Fund
- 262. PIMCO Funds: Global Investor Series plc, Global Investment Grade Credit Fund
- 263. PIMCO StockPLUS LP Fund B
- 264. Pinco 1641-Sierra Pacific Resources
- 265. Plumbers & Pipefitters National Pension Fund
- 266. Portola CLO, Ltd.
- 267. Primus CLO I Ltd.
- 268. Primus CLO II, Ltd.
- 269. Prudential Retirement Insurance & Annuity Company, on behalf of Separate Account SA-18
- 270. Purdue University
- 271. Putnam 29X-Funds Trust Floating Rate Income Fund
- 272. R3 Capital Partners Master, L.P.
- 273. Race Point II CLO, Limited
- 274. Race Point III CLO, Limited
- 275. Race Point IV CLO, Limited
- 276. Raytheon Master Pension Trust with respect to account Logan Floating Rate Portfolio
- 277. Raytheon Master Pension Trust with respect to account Logan Mid Grade Portfolio
- 278. Raytheon Master Pension Trust with respect to account WAMCO 3131
- 279. RBC Dexia Investor Services Trust as Trustee for GM Canada Foreign Trust
- 280. Reams – Agility Global Fixed Income Master Fund LP
- 281. Reams - Labcorp Cash Balance Retirement Fund
- 282. Reams – Laboratory Corp. of America Holdings
- 283. Reams – Parkview Memorial Health
- 284. Red River HYPI, L.P.
- 285. Reichhold
- 286. Reinsurance Group of America, Inc.
- 287. Retirement Board of the Park Employees' and Retirement Board Employees' Annuity and Benefit Fund of Chicago
- 288. Russell Institutional Funds LLC Russell Core Bond Fund
- 289. Russell Investment Company plc Russell U.S. Bond Fund
- 290. Russell Investment Company Russell Strategic Bond Fund
- 291. Russell Trust Company Russell Multi-Manager Bond Fund
- 292. Sankaty High Yield Partners III, L.P.
- 293. Santa Barbara County Employees' Retirement System
- 294. Scout Core Plus Bond Fund (formerly Frontega Columbus Core Plus Bond Fund)
- 295. Seattle City Employees' Retirement System
- 296. SEI Institutional Investments Trust - High Yield Bond Fund
- 297. SEI Institutional Managed Trust - High Yield Bond Fund
- 298. SEI Institutional Managed Trust-Core Fixed Income Fund
- 299. Senior Debt Portfolio
- 300. SFR Ltd.
- 301. Shinnecock CLO II, Ltd.

- 302. Silverado CLO 2006-1 Ltd.
- 303. Sola Ltd; Ultra Master Ltd
- 304. Sonoma County Employees' Retirement Association
- 305. SRI Fund, L.P.
- 306. SSS Funding II, LLC
- 307. St. Luke's Health System Corporation, as successor to St. Luke's Episcopal Health System Foundation
- 308. State of Indiana Major Moves Construction Fund
- 309. State Street Bank and Trust Company as Trustee of the FCA US LLC Master Retirement Trust
- 310. State Teachers Retirement System of Ohio
- 311. Stichting Depository APG Fixed Income Credits Pool
- 312. Stichting Pensioenfonds van de Metalektro f/k/a Stichting Bedrijfstakpensioenfonds Voor De Metalektro
- 313. Stoney Lane Funding I Ltd.
- 314. Taconic Capital Partners 1.5 L.P.
- 315. Taconic Market Dislocation Fund II L.P.
- 316. Taconic Market Dislocation Master Fund II L.P.
- 317. Taconic Opportunity Fund L.P.
- 318. TCW High Income Partners Ltd.
- 319. TCW Illinois State Board of Investments
- 320. TCW Senior Secured Loan Fund L.P.
- 321. Texas County & District Retirement System
- 322. The Children's Hospital of Philadelphia Foundation
- 323. The Core Plus Fixed Income Portfolio, a series of Delaware Pooled Trust
- 324. The Duchossois Group Inc. Pension Trust
- 325. The Galaxite Master Unit Trust
- 326. The High-Yield Bond Portfolio, a series of Delaware Pooled Trust
- 327. The Lincoln National Life Insurance Company Separate Account 12
- 328. The Lincoln National Life Insurance Company Separate Account 20
- 329. The Missouri State Employees Retirement System
- 330. The Rotary Foundation
- 331. The Royal Bank of Scotland plc
- 332. The State of Connecticut Retirement Plan and Trust Funds
- 333. Thrivent Financial for Lutherans
- 334. Thrivent High Yield Fund, a series of Thrivent Mutual Funds
- 335. Thrivent High Yield Portfolio, a series of Thrivent Series Fund, Inc.
- 336. Thrivent Income Fund, a series of Thrivent Mutual Funds
- 337. Thrivent Income Portfolio, a series of Thrivent Series Fund, Inc.
- 338. TMCT II, LLC
- 339. TMCT, LLC
- 340. Transamerica MFS High Yield Bond VP (now known as Transamerica Aegon High Yield Bond VP, which is a series of Transamerica Series Trust
- 341. Trilogy Portfolio Company, LLC
- 342. TRS SVCO LLC
- 343. University of Kentucky

- 344. Variable Insurance Products Fund V: Strategic Income Portfolio
- 345. Velocity CLO Ltd.
- 346. Ventura County Employees' Retirement Association
- 347. Virginia Retirement System
- 348. Virtus Multi Sector Fixed Income Fund
- 349. Virtus Multisector Short Term Bond Fund
- 350. Virtus Senior Floating Rate Fund
- 351. Vitesse CLO Ltd.
- 352. Vulcan Ventures, Inc.
- 353. Wells Fargo & Company Master Pension Trust
- 354. Wells Fargo Advisors High Yield Bond Fund, a series of Wells Fargo Funds Trust
- 355. Wells Fargo Advisors Income Opportunities Fund
- 356. Wells Fargo Advisors Multi-Sector Income Fund
- 357. Wells Fargo Advisors Utilities and High Income Fund
- 358. Wells Fargo Principal Investments, LLC
- 359. Wespeth Benefits and Investments
- 360. West Bend Mutual Insurance Company
- 361. Western Asset Floating Rate High Income Fund, LLC
- 362. Wexford Catalyst Investors LLC
- 363. Wexford Spectrum Investors LLC
- 364. WM Pool-High Yield Fixed Interest Trust

Exhibit B

Exhibit B: Joint Exhibit List

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-0001	Term Loan Agreement, dated November 29, 2006	General Motors Corporation, Amendment No. 1 to Form S-4, filed May 14, 2009 (excerpt)		
JX-0002	Term Loan Collateral Agreement, dated November 29, 2006	Burshline 10/26/16 Dep., Ex. JPM-Weil-4		
JX-0003	Declaration of J. Stephen Worth, dated May 31, 2009 (Case No. 09-50026, Docket No. 425)	Worth 9/27/16 Dep., Ex. AAT-Worth 1		
JX-0004	Supplemental Declaration of J. Stephen Worth, dated July 7, 2009 (Case No. 09-50026, Docket No. 3031)	Worth 9/27/16 Dep., Ex. AAT-Worth 2		
JX-0005	Declaration of Harry Wilson, dated June 5, 2009, and exhibits	Case No. 09-50026, Docket No. 2577		
JX-0006	Affidavit of Frederick Henderson, dated June 1, 2009	Case No. 09-50026, Docket No. 21 (DF0001416)		
JX-0007	Order Approving DIP Motion on an Interim Basis and Permitting the U.S. Treasury to Fund Up to \$15 Billion of the DIP Loan, dated June 2, 2009	Case No. 09-50026, Docket No. 292		
JX-0008	Decision on Debtors' Motion for Approval of Sale of Assets, dated July 5, 2009	Case No. 09-50026, Docket No. 2967		
JX-0009	General Motors Company, 2009 Form 10-K, filed April 7, 2010		Furey; Starzecki; Voigt	Ex. JPM/Deloitte 1
JX-0010	General Motors Company, Form S-1, filed August 18, 2010			
JX-0011	Excerpt of eFAST (June 2009), offered for limited purpose of explaining eFAST classifications	Fulcher 10/27/16 Dep., Ex. AT GM 1 (excerpt of KPMG-GM0092238)	Niszcza	Ex. AT-GM-1
JX-0012	Tri-Party Agreement by and among Delta Township Utilities II, LLC, as Debtor, GMAC Commercial Holding Capital Corp., as Lender, and General Motors Corporation, as GM, dated April 14, 2004	NEWGM000125054 - 125095		
JX-0013	Utility Services Agreement between Delta Township Utilities II, LLC and General Motors Corporation--Worldwide Facilities Group, GM--Lansing Delta Township, dated April 14, 2004	NEWGM000125176 - 125415		
JX-0014	Loan and Security Agreement by and between GMAC Commercial Holding Capital Corp., as Lender, and Delta Township Utilities II, LLC, as Debtor, dated April 14, 2004	NEWGM000127191 - 127267		
JX-0015	Mich. Dep't of Treas. Form 4798 (2010)	Fulcher 10/27/16 Dep., Ex. JPM-GM 1	Fulcher	Ex. JPM-GM-1
JX-0016	Mich. Dep't of Treas. Form L-4175 (2010)	Goesling 1/23/17 Dep., Ex. Goesling 5		
JX-0017	General Motors Corporation, Accounting Policy, Real Estate, Plant and Equipment, Section 32, dated June 2009	Niszcza 10/27/16 Dep., Ex. AT GM 19	Niszcza	Ex. AT-GM-19
JX-0018	General Motors Corporation, Chart of Accounts, General Ledger Account Listing - Assets	Niszcza 10/27/16 Dep., Ex. JPM-GM-2	Niszcza	Ex. JPM-GM-2
JX-0019	KPMG Spreadsheet on Capacity Utilization	KPMG-GM0004130		
JX-0020	Accounting Standards Codification Volume III (excerpt; Sections 805, Business Combinations [pp. 1, 3-193]; Section 820 [pp. 1175-1293], Fair Value; Section 852, Reorganizations [pp. 2301-2351]) and Volume V (excerpt; Master Glossary [pp. 87, 214])			
JX-0021	Field Hearing, Congressional Oversight Panel: Oversight of TARP Assistance to the Automobile Industry, dated July 27, 2009			

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-0022	Congressional Oversight Panel, September Oversight Report, dated September 9, 2009		Feldman	Ex. JD-UST-12
JX-0023	Congressional Oversight Panel, March Oversight Report, dated Mar. 16, 2011			
JX-0024	Meet the Press Transcript, Statement of President-elect Obama (Dec. 7, 2008)			
JX-0025	U.S. Treasury, GM Timeline			
JX-0026	Steven Ratner, Reflections on the Auto Restructurings (May 10, 2010)			
JX-0027	Jerald Pinto et al., Equity Valuation: Applications and Processes (2014) (excerpt)			
JX-0028	Shannon P. Pratt and Alina V. Niculita, Valuing a Business (2008) (excerpt; pp. 47-48, 60-61, 276-77)			
JX-0029	Schematic of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	NEWGM000101852		
JX-0030	Picture of Asset 19, BS CMM Full Body Machine - LY90	NEWGM000106374		
JX-0031	Picture of Asset 29, Transfer Press-GG-1	Motors-MM-000005		
JX-0032	Pictures of Visioneering Facility at 17501 Masonic Blvd., Frasier, MI 48026	Weigel 11/15/16 Dep., Ex. JPM-Weigel-6	Weigel	Ex. JPM-Weigel-6
JX-0033	Pictures of Visioneering Facility at 17501 Masonic Blvd., Frasier, MI 48026	Weigel 11/15/16 Dep., Ex. JPM-Weigel-7	Weigel	Ex. JPM-Weigel-7
JX-0034	Paint Blend and Circulation System Operation and Maintenance Manual, dated August 10, 2005 (excerpt)	NEWGM000108968		
JX-0035	Lansing Delta Township Assembly Plant, Main Spray Booth System Operation and Maintenance Manual (excerpt)	NEWGM000109801		
JX-0036	Busway Systems Catalog (2014) (excerpt)	NEWGM000105805		
JX-0037	Marshall & Swift Valuation Service (excerpt)			

Picture & Video Exhibits

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1001	Picture of Asset 1, OP-150 Select; Check Place Shims Auto Station	BRG-100006527-0004		
JX-1002	Picture of Asset 1, OP-150 Select; Check Place Shims Auto Station	BRG-100006527-0036		
JX-1003	Picture of Asset 1, OP-150 Select; Check Place Shims Auto Station	BRG-100006527-0037		
JX-1004	Picture of Asset 1, OP-150 Select; Check Place Shims Auto Station	BRG-100006527-0046		
JX-1005	Picture of Asset 1, OP-150 Select; Check Place Shims Auto Station	BRG-100006527-0020		
JX-1006	Picture of Asset 1, OP-150 Select; Check Place Shims Auto Station	BRG-100006527-0022		
JX-1007	Picture of Asset 1, OP-150 Select; Check Place Shims Auto Station	BRG-100006527-0025		
JX-1008	Picture of Asset 1, OP-150 Select; Check Place Shims Auto Station	BRG-100006527-0027		
JX-1009	Picture of Asset 1, OP-150 Select; Check Place Shims Auto Station	BRG-100006527-0035		
JX-1010	Video of OP-210 17 Spindle Multi Auto station similar to Asset 1, OP-150 Select; Check Place Shims Auto Station	BRG-100006524-0002		
JX-1011	Picture of Asset 2, GA Pits & Trenches	BRG-1000175441-0002		
JX-1012	Picture of Asset 2, GA Pits & Trenches	BRG-1000175441-0003		
JX-1013	Picture of Asset 2, GA Pits & Trenches	BRG-1000175441-0006		
JX-1014	Picture of Asset 2, GA Pits & Trenches	BRG-1000175441-0007		
JX-1015	Picture of Asset 2, GA Pits & Trenches	BRG-1000175441-0008		
JX-1016	Picture of Asset 2, GA Pits & Trenches & Asset 21, GA Conveyor: Skillet - Final - Leg 1	BRG-1000668091-0027		
JX-1017	Picture of Asset 2, GA Pits & Trenches & Asset 21, GA Conveyor: Skillet - Final - Leg 1	BRG-1000668091-0047		
JX-1018	Picture of Asset 2, GA Pits & Trenches	BRG-1000175441-0027		
JX-1019	Picture of Asset 03, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0005		
JX-1020	Picture of Asset 03, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0019		
JX-1021	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0004		
JX-1022	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0007		
JX-1023	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0010		
JX-1024	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0013		
JX-1025	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0014		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1026	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0015		
JX-1027	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0017		
JX-1028	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0018		
JX-1029	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0024		
JX-1030	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0030		
JX-1031	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0031		
JX-1032	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0033		
JX-1033	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0034		
JX-1034	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0035		
JX-1035	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0042		
JX-1036	Picture of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0044		
JX-1037	Video of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100017198-0004		
JX-1038	Video of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033438-0002		
JX-1039	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0017		
JX-1040	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0025		
JX-1041	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0008		
JX-1042	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0010		
JX-1043	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0012		
JX-1044	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0013		
JX-1045	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0015		
JX-1046	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0019		
JX-1047	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0027		
JX-1048	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0030		
JX-1049	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0031		
JX-1050	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0032		
JX-1051	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0037		
JX-1052	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0041		
JX-1053	Picture of Asset 4, Paint Bldg Lines - Process Waste Elpo	BRG-1000378921-0042		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1054	Picture of Asset 4, Paint BLDG Lines – Process Waste Elpo	BRG-1000378921-0028		
JX-1055	Picture of Asset 5, Paint Mix & Circulation - Electrical	BRG-1000379401-0011		
JX-1056	Picture of Asset 5, Paint Mix & Circulation - Electrical	BRG-1000379401-0002		
JX-1057	Picture of Asset 5, Paint Mix & Circulation - Electrical	BRG-1000379401-0003		
JX-1058	Picture of Asset 5, Paint Mix & Circulation - Electrical	BRG-1000379401-0004		
JX-1059	Picture of Asset 5, Paint Mix & Circulation - Electrical	BRG-1000379401-0007		
JX-1060	Picture of Asset 5, Paint Mix & Circulation - Electrical	BRG-1000379401-0008		
JX-1061	Picture of Asset 5, Paint Mix & Circulation - Electrical	BRG-1000379401-0010		
JX-1062	Picture of Asset 5, Paint Mix & Circulation - Electrical	BRG-1000379401-0012		
JX-1063	Picture of Asset 5, Paint Mix & Circulation - Electrical	BRG-1000379401-0015		
JX-1064	Picture of Asset 5, Paint Mix & Circulation - Electrical	BRG-1000379401-0017		
JX-1065	Picture of Asset 5, Paint Mix & Circulation - Electrical	BRG-1000379401-0016		
JX-1066	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0004		
JX-1067	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0006		
JX-1068	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0017		
JX-1069	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0024		
JX-1070	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0015		
JX-1071	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0016		
JX-1072	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0018		
JX-1073	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0020		
JX-1074	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0029		
JX-1075	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0032		
JX-1076	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0040		
JX-1077	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0044		
JX-1078	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0046		
JX-1079	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0058		
JX-1080	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0062		
JX-1081	Picture of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	BRG-1000379541-0019		
JX-1082	Picture of Asset 7, Paint TC Automation Software	BRG-1000381191-0009		
JX-1083	Picture of Asset 7, Paint TC Automation Software	BRG-1000381191-0016		
JX-1084	Picture of Asset 7, Paint TC Automation Software & Asset 9, Paint TC2 CC Bell Zone	BRG-1000381191-0010		
JX-1085	Picture of Asset 7, Paint TC Automation Software & Asset 9, Paint TC2 CC Bell Zone	BRG-1000381191-0014		
JX-1086	Picture of Asset 7, Paint TC Automation Software & Asset 9, Paint TC2 CC Bell Zone	BRG-1000381191-0019		
JX-1087	Picture of Asset 8, GA EOL Paint Spot Reprocess Sys Paint Mix Room	BRG-1000380351-0008		
JX-1088	Picture of Asset 8, GA EOL Paint Spot Reprocess Sys Paint Mix Room	BRG-1000380351-0012		
JX-1089	Picture of Asset 8, GA EOL Paint Spot Reprocess Sys Paint Mix Room	BRG-1000380351-0024		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1090	Picture of Asset 8, GA EOL Paint Spot Reprocess Sys Paint Mix Room	BRG-I000380351-0004		
JX-1091	Picture of Asset 8, GA EOL Paint Spot Reprocess Sys Paint Mix Room	BRG-I000380351-0005		
JX-1092	Picture of Asset 8, GA EOL Paint Spot Reprocess Sys Paint Mix Room	BRG-I000380351-0007		
JX-1093	Picture of Asset 8, GA EOL Paint Spot Reprocess Sys Paint Mix Room	BRG-I000380351-0010		
JX-1094	Picture of Asset 8, GA EOL Paint Spot Reprocess Sys Paint Mix Room	BRG-I000380351-0021		
JX-1095	Picture of Asset 8, GA EOL Paint Spot Reprocess Sys Paint Mix Room	BRG-I000380351-0027		
JX-1096	Picture of Asset 9, Paint TC2 CC Bell Zone	BRG-I000381191-0003		
JX-1097	Picture of Asset 9, Paint TC2 CC Bell Zone	BRG-I000381191-0005		
JX-1098	Picture of Asset 9, Paint TC2 CC Bell Zone	BRG-I000381191-0006		
JX-1099	Picture of Asset 9, Paint TC2 CC Bell Zone	BRG-I000381191-0013		
JX-1100	Picture of Asset 9, Paint TC2 CC Bell Zone	BRG-I000381191-0004		
JX-1101	Picture of Asset 9, Paint TC2 CC Bell Zone	BRG-I000381191-0008		
JX-1102	Picture of Asset 9, Paint TC2 CC Bell Zone	BRG-I000381191-0011		
JX-1103	Picture of Asset 10, Opticell - Robotic Measurement System	BRG-I000419201-0003		
JX-1104	Picture of Asset 10, Opticell - Robotic Measurement System	BRG-I000419201-0014		
JX-1105	Picture of Asset 10, Opticell - Robotic Measurement System	BRG-I000419201-0016		
JX-1106	Picture of Asset 10, Opticell - Robotic Measurement System	BRG-I000419201-0021		
JX-1107	Picture of Asset 10, Opticell - Robotic Measurement System	BRG-I000419201-0007		
JX-1108	Picture of Asset 10, Opticell - Robotic Measurement System	BRG-I000419201-0009		
JX-1109	Picture of Asset 10, Opticell - Robotic Measurement System	BRG-I000419201-0012		
JX-1110	Picture of Asset 10, Opticell - Robotic Measurement System	BRG-I000419201-0015		
JX-1111	Picture of Asset 10, Opticell - Robotic Measurement System	BRG-I000419201-0022		
JX-1112	Video of Asset 10, Opticell - Robotic Measurement System	BRG-I000419201-0006		
JX-1113	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0011		
JX-1114	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0016		
JX-1115	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0019		
JX-1116	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0033		
JX-1117	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0034		
JX-1118	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0051		
JX-1119	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0052		
JX-1120	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0055		
JX-1121	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0061		
JX-1122	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0067		
JX-1123	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0071		
JX-1124	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0073		
JX-1125	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0075		
JX-1126	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0087		
JX-1127	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0091		
JX-1128	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-I000459091-0094		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1129	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0095		
JX-1130	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0109		
JX-1131	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0115		
JX-1132	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0116		
JX-1133	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0118		
JX-1134	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0122		
JX-1135	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0005		
JX-1136	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0013		
JX-1137	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0014		
JX-1138	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0024		
JX-1139	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0048		
JX-1140	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0060		
JX-1141	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0070		
JX-1142	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0074		
JX-1143	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0077		
JX-1144	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0086		
JX-1145	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0088		
JX-1146	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0097		
JX-1147	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0098		
JX-1148	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0103		
JX-1149	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0106		
JX-1150	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0121		
JX-1151	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0008		
JX-1152	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0041		
JX-1153	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0053		
JX-1154	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0057		
JX-1155	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0065		
JX-1156	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0081		
JX-1157	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0092		
JX-1158	Picture of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0096		
JX-1159	Video of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0003		
JX-1160	Video of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0006		
JX-1161	Video of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-1000459091-0018		
JX-1162	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0006		
JX-1163	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0012		
JX-1164	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0013		
JX-1165	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0014		
JX-1166	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0017		
JX-1167	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0018		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1168	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0020		
JX-1169	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0030		
JX-1170	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0032		
JX-1171	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0033		
JX-1172	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0036		
JX-1173	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0037		
JX-1174	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0040		
JX-1175	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0042		
JX-1176	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0011		
JX-1177	Picture of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0007		
JX-1178	Video of Asset 12, BS Robot LAZN-150R1	BRG-1000481691-0004		
JX-1179	Picture of Asset 13, BS Weld Bus Ducts	BRG-1000505131-0006		
JX-1180	Picture of Asset 13, BS Weld Bus Ducts	BRG-1000505131-0005		
JX-1181	Picture of Asset 13, BS Weld Bus Ducts	BRG-1000505131-0007		
JX-1182	Picture of Asset 13, BS Weld Bus Ducts	BRG-1000505131-0008		
JX-1183	Picture of Asset 13, BS Weld Bus Ducts	BRG-1000505131-0011		
JX-1184	Picture of Asset 13, BS Weld Bus Ducts	BRG-1000610791-0006		
JX-1185	Picture of Asset 13, BS Weld Bus Ducts & Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0027		
JX-1186	Video of Asset 13, BS Weld Bus Ducts	BRG-1000505131-0002		
JX-1187	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0012		
JX-1188	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0027		
JX-1189	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0038		
JX-1190	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0045		
JX-1191	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0050		
JX-1192	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0060		
JX-1193	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0005		
JX-1194	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0006		
JX-1195	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0008		
JX-1196	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0009		
JX-1197	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0023		
JX-1198	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0025		
JX-1199	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0039		
JX-1200	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0040		
JX-1201	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0051		
JX-1202	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0053		
JX-1203	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0058		
JX-1204	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0007		
JX-1205	Picture of Asset 14, Leak Test Base Machine	BRG-100053677-0020		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1206	Video of Asset 14, Leak Test Base Machine	BRG-100053677-0002		
JX-1207	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0006		
JX-1208	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0008		
JX-1209	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0039		
JX-1210	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0043		
JX-1211	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0050		
JX-1212	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0052		
JX-1213	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0074		
JX-1214	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0090		
JX-1215	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0004		
JX-1216	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0005		
JX-1217	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0029		
JX-1218	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0037		
JX-1219	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0038		
JX-1220	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0072		
JX-1221	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0077		
JX-1222	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0078		
JX-1223	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0082		
JX-1224	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0086		
JX-1225	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0111		
JX-1226	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0115		
JX-1227	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0116		
JX-1228	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0123		
JX-1229	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0129		
JX-1230	Picture of Asset 15, GA T/W: Soap; Mount And Inflate	BRG-1000606231-0136		
JX-1231	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0022		
JX-1232	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0029		
JX-1233	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0066		
JX-1234	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0084		
JX-1235	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0085		
JX-1236	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0021		
JX-1237	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0005		
JX-1238	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0023		
JX-1239	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0038		
JX-1240	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0060		
JX-1241	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0062		
JX-1242	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0070		
JX-1243	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0020		
JX-1244	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0039		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1245	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0055		
JX-1246	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0069		
JX-1247	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0003		
JX-1248	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0009		
JX-1249	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0010		
JX-1250	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0011		
JX-1251	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0013		
JX-1252	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0019		
JX-1253	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0025		
JX-1254	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0041		
JX-1255	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0049		
JX-1256	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0067		
JX-1257	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0080		
JX-1258	Picture of Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0082		
JX-1259	Video of Asset 16, BS Skid Conveyor - Laza (no audio)	BRG-1000610791-0002		
JX-1260	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0025		
JX-1261	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0013		
JX-1262	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0058		
JX-1263	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0085		
JX-1264	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0098		
JX-1265	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0119		
JX-1266	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0029		
JX-1267	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0005		
JX-1268	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0050		
JX-1269	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0164		
JX-1270	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0118		
JX-1271	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0125		
JX-1272	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0171		
JX-1273	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0018		
JX-1274	Picture of Asset 17, BS P&F Conveyor - Body Side Inner LH Del	BRG-1000616141-0084		
JX-1275	Picture of Asset 18, GA Conveyor: Vertical Adjusting Carrier (Vac) Sys - Carriers	BRG-1000622691-0052		
JX-1276	Picture of Asset 18, GA Conveyor: Vertical Adjusting Carrier (Vac) Sys - Carriers	BRG-1000622691-0055		
JX-1277	Picture of Asset 18, GA Conveyor: Vertical Adjusting Carrier (Vac) Sys - Carriers	BRG-1000622691-0067		
JX-1278	Picture of Asset 18, GA Conveyor: Vertical Adjusting Carrier (Vac) Sys - Carriers	BRG-1000622691-0006		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1279	Picture of Asset 18, GA Conveyor: Vertical Adjusting Carrier (Vac) Sys - Carriers	BRG-1000622691-0041		
JX-1280	Picture of Asset 18, GA Conveyor: Vertical Adjusting Carrier (Vac) Sys - Carriers	BRG-1000622691-0077		
JX-1281	Video of Asset 18, GA Conveyor: Vertical Adjusting Carrier (VAC) SYS - Carriers (no audio)	BRG-1000622691-0089		
JX-1282	Video of Asset 18, GA Conveyor: Vertical Adjusting Carrier (VAC) SYS - Carriers (no audio)	BRG-1000622691-0090		
JX-1283	Video of Asset 18, GA Conveyor: Vertical Adjusting Carrier (VAC) SYS - Carriers (no audio)	BRG-1000622691-0083		
JX-1284	Picture of Asset 19, BS CMM Full Body Machine - LY90	BRG-1000646671 (No longer on-site)-0006		
JX-1285	Picture of Asset 19, BS CMM Full Body Machine - LY90	BRG-1000646671 (No longer on-site)-0026		
JX-1286	Picture of Asset 20, GA Conveyor Sub-ASM Receiving (SAR): WTD1000 - Wheel & Tire Delivery	BRG-1000656401-0004		
JX-1287	Picture of Asset 20, GA Conveyor Sub-ASM Receiving (SAR): WTD1000 - Wheel & Tire Delivery	BRG-1000656401-0025		
JX-1288	Picture of Asset 20, GA Conveyor Sub-ASM Receiving (SAR): WTD1000 - Wheel & Tire Delivery	BRG-1000656401-0027		
JX-1289	Picture of Asset 20, GA Conveyor Sub-ASM Receiving (SAR): WTD1000 - Wheel & Tire Delivery	BRG-1000656401-0003		
JX-1290	Picture of Asset 20, GA Conveyor Sub-ASM Receiving (SAR): WTD1000 - Wheel & Tire Delivery	BRG-1000656401-0010		
JX-1291	Picture of Asset 20, GA Conveyor Sub-ASM Receiving (SAR): WTD1000 - Wheel & Tire Delivery	BRG-1000656401-0023		
JX-1292	Picture of Asset 20, GA Conveyor Sub-ASM Receiving (SAR): WTD1000 - Wheel & Tire Delivery	BRG-1000656401-0033		
JX-1293	Picture of Asset 20, GA Conveyor Sub-ASM Receiving (SAR): WTD1000 - Wheel & Tire Delivery	BRG-1000656401-0028		
JX-1294	Picture of Asset 20, GA Conveyor Sub-ASM Receiving (SAR): WTD1000 - Wheel & Tire Delivery	BRG-1000656401-0026		
JX-1295	Video of Asset 20, GA Conveyor SUB-ASM RECEIVING (SAR): WTD1000 - Wheel & Tire Delivery (no audio)	BRG-1000656401-0046		
JX-1296	Video of Asset 20, GA Conveyor SUB-ASM Receiving (SAR): WTD1000 - Wheel & Tire Delivery (no audio)	BRG-1000656401-0049		
JX-1297	Picture of Asset 21, GA Conveyor: Skillet - Final - Leg 1	BRG-1000668091-0015		
JX-1298	Picture of Asset 21, GA Conveyor: Skillet - Final - Leg 1	BRG-1000668091-0022		
JX-1299	Picture of Asset 21, GA Conveyor: Skillet - Final - Leg 1	BRG-1000668091-0025		
JX-1300	Picture of Asset 21, GA Conveyor: Skillet - Final - Leg 1	BRG-1000668091-0026		
JX-1301	Picture of Asset 21, GA Conveyor: Skillet - Final - Leg 1	BRG-1000668091-0038		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1302	Picture of Asset 21, GA Conveyor: Skillet - Final - Leg 1	BRG-1000668091-0029		
JX-1303	Picture of Asset 21, GA Conveyor: Skillet - Final - Leg 1	BRG-1000668091-0046		
JX-1304	Picture of Asset 21, GA Conveyor: Skillet - Final - Leg 1	BRG-1000668091-0002		
JX-1305	Picture of Asset 21, GA Conveyor: Skillet - Final - Leg 1	BRG-1000668091-0043		
JX-1306	Video of Asset 21, GA Conveyor: Skillet - Final - LEG 1 (no audio)	BRG-1000668091-0014		
JX-1307	Picture of Asset 22, FANUC M-710IB/70T ROBOT - Assembly	BRG-100069322-0019		
JX-1308	Picture of Asset 22, FANUC M-710IB/70T ROBOT - Assembly	BRG-100069322-0051		
JX-1309	Picture of Asset 22, FANUC M-710IB/70T ROBOT - Assembly	BRG-100069322-0052		
JX-1310	Picture of Asset 22, FANUC M-710IB/70T ROBOT - Assembly	BRG-100069322-0016		
JX-1311	Picture of Asset 22, FANUC M-710IB/70T Robot - Assembly	BRG-100069322-0025		
JX-1312	Picture of Asset 22, FANUC M-710IB/70T ROBOT - Assembly	BRG-100069322-0048		
JX-1313	Picture of Asset 22, FANUC M-710IB/70T Robot - Assembly	BRG-100069322-0050		
JX-1314	Picture of Asset 22, FANUC M-710IB/70T ROBOT - Assembly	BRG-100069322-0058		
JX-1315	Picture of Asset 22, FANUC M-710IB/70T ROBOT - Assembly	BRG-100069322-0030		
JX-1316	Picture of Asset 22, FANUC M-710IB/70T ROBOT - Assembly	BRG-100069322-0040		
JX-1317	Picture of Asset 22, FANUC M-710IB/70T ROBOT - Assembly	BRG-100069322-0049		
JX-1318	Picture of Asset 22, FANUC M-710IB/70T ROBOT - Assembly	BRG-100069322-0053		
JX-1319	Video of Asset 22, FANUC M-710IB/70T Robot - Assembly	BRG-100069322-0006		
JX-1320	Video of Asset 22, FANUC M-710IB/70T Robot - Assembly (no audio)	BRG-100069322-0002		
JX-1321	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0022		
JX-1322	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0045		
JX-1323	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0053		
JX-1324	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0103		
JX-1325	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0112		
JX-1326	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0113		
JX-1327	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0171		
JX-1328	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0189		
JX-1329	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0239		
JX-1330	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0007		
JX-1331	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0008		
JX-1332	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0074		
JX-1333	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0198		
JX-1334	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 1 of 3 (C02018)-0117		
JX-1335	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0181		
JX-1336	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0087		
JX-1337	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0097		
JX-1338	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0104		
JX-1339	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0199		
JX-1340	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0223		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1341	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 2 of 3 (C02017)-0230		
JX-1342	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 3 of 3 (C01433)-0015		
JX-1343	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 3 of 3 (C01433)-0090		
JX-1344	Picture of Asset 23, Aluminum Machining System	BRG-Undetermined 1 of 3 (C02018)-0198		
JX-1345	Video of Asset 23, Aluminum Machining System (no audio)	BRG-Undetermined 1 of 3 (C02018)-0002		
JX-1346	Video of Asset 23, Aluminum Machining System (no audio)	BRG-Undetermined 1 of 3 (C02018)-0004		
JX-1347	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0012		
JX-1348	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0017		
JX-1349	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0037		
JX-1350	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0072		
JX-1351	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0003		
JX-1352	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0009		
JX-1353	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0034		
JX-1354	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0041		
JX-1355	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0052		
JX-1356	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0053		
JX-1357	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0010		
JX-1358	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0039		
JX-1359	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0005		
JX-1360	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0027		
JX-1361	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0031		
JX-1362	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0032		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1363	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0033		
JX-1364	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0051		
JX-1365	Picture of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear	BRG-100071009-0057		
JX-1366	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0035		
JX-1367	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0016		
JX-1368	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0018		
JX-1369	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0022		
JX-1370	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0030		
JX-1371	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0036		
JX-1372	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0042		
JX-1373	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0061		
JX-1374	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0062		
JX-1375	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0105		
JX-1376	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0110		
JX-1377	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0112		
JX-1378	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0005		
JX-1379	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0003		
JX-1380	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0014		
JX-1381	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0068		
JX-1382	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0119		
JX-1383	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0115		
JX-1384	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0031		
JX-1385	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0009		
JX-1386	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0012		
JX-1387	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0017		
JX-1388	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0043		
JX-1389	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0044		
JX-1390	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0049		
JX-1391	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0056		
JX-1392	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0057		
JX-1393	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0069		
JX-1394	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0074		
JX-1395	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0080		
JX-1396	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0088		
JX-1397	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0092		
JX-1398	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0124		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1399	Picture of Asset 25, Liebherr Hobb Machine	BRG-100071022-0125		
JX-1400	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0021		
JX-1401	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0026		
JX-1402	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0038		
JX-1403	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0065		
JX-1404	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0075		
JX-1405	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0080		
JX-1406	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0088		
JX-1407	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0008		
JX-1408	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0044		
JX-1409	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0045		
JX-1410	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0051		
JX-1411	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0054		
JX-1412	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0056		
JX-1413	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0058		
JX-1414	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0060		
JX-1415	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0027		
JX-1416	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0017		
JX-1417	Picture of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0079		
JX-1418	Video of Asset 26, Core Delivery Conveyor System CB116 & 122	BRG-1000995344-0002		
JX-1419	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0118		
JX-1420	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0119		
JX-1421	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0145		
JX-1422	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0202		
JX-1423	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0209		
JX-1424	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0232		
JX-1425	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0263		
JX-1426	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0326		
JX-1427	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0015		
JX-1428	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0066		
JX-1429	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0082		
JX-1430	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0098		
JX-1431	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0137		
JX-1432	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0140		
JX-1433	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0188		
JX-1434	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0190		
JX-1435	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0210		
JX-1436	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0217		
JX-1437	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0105		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1438	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0107		
JX-1439	Picture of Asset 27, Emissions System #4 Cupola	BRG-100098085-0246		
JX-1440	Video of Asset 27, Emmissions System #4 Cupola	BRG-100098085-0002		
JX-1441	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0077		
JX-1442	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0044		
JX-1443	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0071		
JX-1444	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0096		
JX-1445	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0104		
JX-1446	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0058		
JX-1447	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0004		
JX-1448	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0006		
JX-1449	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0026		
JX-1450	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0045		
JX-1451	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0088		
JX-1452	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0092		
JX-1453	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0005		
JX-1454	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0023		
JX-1455	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0053		
JX-1456	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0066		
JX-1457	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0070		
JX-1458	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0074		
JX-1459	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0076		
JX-1460	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0078		
JX-1461	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0081		
JX-1462	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0083		
JX-1463	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0084		
JX-1464	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0094		
JX-1465	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0107		
JX-1466	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0113		
JX-1467	Picture of Asset 31, Danly 4000 Ton Press	BRG-BUY118209011-0114		
JX-1468	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0059		
JX-1469	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0151		
JX-1470	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0074		
JX-1471	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0063		
JX-1472	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0102		
JX-1473	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0111		
JX-1474	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0115		
JX-1475	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0146		
JX-1476	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0133		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1477	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0096		
JX-1478	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0097		
JX-1479	Video of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0002		
JX-1480	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0015		
JX-1481	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0016		
JX-1482	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0043		
JX-1483	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0082		
JX-1484	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0085		
JX-1485	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0103		
JX-1486	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0116		
JX-1487	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0117		
JX-1488	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0122		
JX-1489	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0123		
JX-1490	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0124		
JX-1491	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0125		
JX-1492	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0127		
JX-1493	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0128		
JX-1494	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0152		
JX-1495	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press	BRG-BUYR503469FA1-0155		
JX-1496	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker and EOL	BRG-BUYR503481FA1-0029		
JX-1497	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker and EOL	BRG-BUYR503481FA1-0061		
JX-1498	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker and EOL	BRG-BUYR503481FA1-0085		
JX-1499	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker and EOL	BRG-BUYR503481FA1-0173		
JX-1500	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker and EOL	BRG-BUYR503481FA1-0147		
JX-1501	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker and EOL	BRG-BUYR503481FA1-0172		
JX-1502	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker and EOL	BRG-BUYR503481FA1-0019		
JX-1503	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker and EOL	BRG-BUYR503481FA1-0125		
JX-1504	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker and EOL	BRG-BUYR503481FA1-0115		
JX-1505	Video of Asset 33, B3-5 Transfer Press System Incl. Destacker and EOL	BRG-BUYR503481FA1-0004		
JX-1506	Video of Asset 33, B3-5 Transfer Press System Incl. Destacker and EOL	BRG-BUYR503481FA1-0010		
JX-1507	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker AND ELO	BRG-BUYR503481FA1-0022		
JX-1508	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker AND ELO	BRG-BUYR503481FA1-0023		
JX-1509	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker AND ELO	BRG-BUYR503481FA1-0093		
JX-1510	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker AND ELO	BRG-BUYR503481FA1-0112		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1511	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker AND ELO	BRG-BUYR50348IFA1-0134		
JX-1512	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker AND ELO	BRG-BUYR50348IFA1-0154		
JX-1513	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker AND ELO	BRG-BUYR50348IFA1-0157		
JX-1514	Picture of Asset 33, B3-5 Transfer Press System Incl. Destacker AND ELO	BRG-BUYR50348IFA1-0158		
JX-1515	Picture of Asset 34, Build Line W/Foundation	BRG-NIT219381 (No longer on-site)-0060		
JX-1516	Picture of Asset 34, Build Line W/Foundation	BRG-NIT219381 (No longer on-site)-0039		
JX-1517	Picture of Asset 34, Build Line W/Foundation	BRG-NIT219381 (No longer on-site)-0010		
JX-1518	Picture of Asset 34, Build Line W/Foundation	BRG-NIT219381 (No longer on-site)-0025		
JX-1519	Picture of Asset 34, Build Line W/Foundation	BRG-NIT219381 (No longer on-site)-0005		
JX-1520	Picture of Asset 34, Build Line W/Foundation	BRG-NIT219381 (No longer on-site)-0071		
JX-1521	Picture of Asset 34, Build Line W/Foundation	BRG-NIT219381 (No longer on-site)-0073		
JX-1522	Video of Asset 34, Build Line with Foundation	BRG-NIT219381 (No longer on-site)-0002		
JX-1523	Picture of Asset 35, Button Up and Test Conveyor System	BRG-C03340-0004		
JX-1524	Picture of Asset 35, Button Up and Test Conveyor System	BRG-C03340-0013		
JX-1525	Picture of Asset 35, Button Up and Test Conveyor System	BRG-C03340-0021		
JX-1526	Picture of Asset 35, Button Up And Test Conveyor System	BRG-C03340-0026		
JX-1527	Picture of Asset 35, Button Up and Test Conveyor System	BRG-C03340-0032		
JX-1528	Picture of Asset 35, Button Up and Test Conveyor System	BRG-C03340-0010		
JX-1529	Picture of Asset 35, Button Up And Test Conveyor System	BRG-C03340-0012		
JX-1530	Picture of Asset 35, Button Up And Test Conveyor System	BRG-C03340-0037		
JX-1531	Picture of Asset 35, Button Up And Test Conveyor System	BRG-C03340-0059		
JX-1532	Picture of Asset 35, Button Up And Test Conveyor System	BRG-C03340-0018		
JX-1533	Picture of Asset 35, Button Up And Test Conveyor System	BRG-C03340-0033		
JX-1534	Picture of Asset 35, Button Up And Test Conveyor System	BRG-C03340-0039		
JX-1535	Picture of Asset 35, Button Up And Test Conveyor System	BRG-C03340-0053		
JX-1536	Picture of Asset 35, Button Up And Test Conveyor System	BRG-C03340-0058		
JX-1537	Picture of Asset 35, Button Up And Test Conveyor System	BRG-C03340-0061		
JX-1538	Picture of Asset 35, Button Up And Test Conveyor System	BRG-C03340-0063		
JX-1539	Picture of Asset 35, Button Up And Test Conveyor System	BRG-C03340-0065		
JX-1540	Picture of Asset 35, Button Up And Test Conveyor System	BRG-C03340-0067		
JX-1541	Picture of Asset 36, Helical Broaching Equipment	BRG-NITC03507-0014		
JX-1542	Picture of Asset 36, Helical Broaching Equipment	BRG-NITC03507-0031		
JX-1543	Picture of Asset 36, Helical Broaching Equipment	BRG-NITC03507-0034		
JX-1544	Picture of Asset 36, Helical Broaching Equipment	BRG-NITC03507-0055		
JX-1545	Picture of Asset 36, Helical Broaching Equipment	BRG-NITC03507-0056		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1546	Picture of Asset 36, Helical Broaching Equipment	BRG-NITC03507-0063		
JX-1547	Picture of Asset 36, Helical Broaching Equipment	BRG-NITC03507-0068		
JX-1548	Picture of Asset 36, Helical Broaching Equipment	BRG-NITC03507-0075		
JX-1549	Picture of Asset 36, Helical Broaching Equipment	BRG-NITC03507-0080		
JX-1550	Picture of Asset 36, Helical Broaching Equipment	BRG-NITC03507-0008		
JX-1551	Picture of Asset 36, Helical Broaching Equipment	BRG-NITC03507-0096		
JX-1552	Picture of Asset 36, Helical Broaching Equipment	BRG-NITC03507-0009		
JX-1553	Picture of Asset 36, Helical Broaching Equipment	BRG-NITC03507-0015		
JX-1554	Picture of Asset 36, Helical Broaching Equipment	BRG-NITC03507-0103		
JX-1555	Video of Asset 36, Helical Broaching Equipment (no audio)	BRG-NITC03507-0106		
JX-1556	Picture of Asset 37, Courtyard Enclosure	BRG-NITW0S11026A-0040		
JX-1557	Picture of Asset 37, Courtyard Enclosure	BRG-NITW0S11026A-0043		
JX-1558	Picture of Asset 37, Courtyard Enclosure	BRG-NITW0S11026A-0050		
JX-1559	Picture of Asset 37, Courtyard Enclosure	BRG-NITW0S11026A-0069		
JX-1560	Picture of Asset 37, Courtyard Enclosure	BRG-NITW0S11026A-0078		
JX-1561	Picture of Asset 37, Courtyard Enclosure	BRG-NITW0S11026A-0051		
JX-1562	Picture of Asset 37, Courtyard Enclosure	BRG-NITW0S11026A-0060		
JX-1563	Picture of Asset 37, Courtyard Enclosure	BRG-NITW0S11026A-0005		
JX-1564	Picture of Asset 37, Courtyard Enclosure	BRG-NITW0S11026A-0016		
JX-1565	Picture of Asset 37, Courtyard Enclosure	BRG-NITW0S11026A-0079		
JX-1566	Video of Asset 37, Courtyard Enclosure	BRG-NITW0S11026A-0002		
JX-1567	Picture of Asset 38, System Gas Cleaning No.4 Cupola	BRG-NJL2924414P1-0035		
JX-1568	Picture of Asset 38, System Gas Cleaning No.4 Cupola	BRG-NJL2924414P1-0051		
JX-1569	Picture of Asset 38, System Gas Cleaning No.4 Cupola	BRG-NJL2924414P1-0058		
JX-1570	Picture of Asset 38, System Gas Cleaning No.4 Cupola	BRG-NJL2924414P1-0029		
JX-1571	Picture of Asset 38, System Gas Cleaning No.4 Cupola	BRG-NJL2924414P1-0030		
JX-1572	Picture of Asset 38, System Gas Cleaning No.4 Cupola	BRG-NJL2924414P1-0040		
JX-1573	Picture of Asset 38, System Gas Cleaning No.4 Cupola	BRG-NJL2924414P1-0056		
JX-1574	Picture of Asset 38, System Gas Cleaning No.4 Cupola	BRG-NJL2924414P1-0063		
JX-1575	Picture of Asset 38, System Gas Cleaning No.4 Cupola	BRG-NJL2924414P1-0085		
JX-1576	Picture of Asset 38, System Gas Cleaning No.4 Cupola	BRG-NJL2924414P1-0093		
JX-1577	Picture of Asset 38, System Gas Cleaning No.4 Cupola	BRG-NJL2924414P1-0101		
JX-1578	Picture of Asset 38, System Gas Cleaning No. 4 Cupola	BRG-NJL2924414P1-0053		
JX-1579	Picture of Asset 39, CB 91 Robot	BRG-NJL2983009-0014		
JX-1580	Picture of Asset 39, CB 91 Robot	BRG-NJL2983009-0016		
JX-1581	Picture of Asset 39, CB 91 Robot	BRG-NJL2983009-0010		
JX-1582	Picture of Asset 39, CB 91 Robot	BRG-NJL2983009-0012		
JX-1583	Picture of Asset 39, CB 91 Robot	BRG-NJL2983009-0022		
JX-1584	Picture of Asset 39, CB 91 Robot	BRG-NJL2983009-0023		

JX Number	Exhibit Description	Exhibit Source	Deposition Transcript	Deposition Exhibits
JX-1585	Picture of Asset 39, CB 91 Robot	BRG-NJL2983009-0024		
JX-1586	Picture of Asset 39, CB 91 Robot	BRG-NJL2983009-0030		
JX-1587	Picture of Asset 39, CB 91 Robot	BRG-NJL2983009-0037		
JX-1588	Picture of Asset 39, CB 91 Robot	BRG-NJL2983009-0040		
JX-1589	Picture of Asset 39, CB 91 Robot	BRG-NJL2983009-0049		
JX-1590	Picture of Asset 39, CB 91 Robot	BRG-NJL2983009-0050		
JX-1591	Video of Asset 39, CB 91 Robot	BRG-NJL29830091-0002		
JX-1592	Video of Asset 39, CB 91 Robot	BRG-NJL29830091-0013		
JX-1593	Picture of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0007		
JX-1594	Picture of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0022		
JX-1595	Picture of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0027		
JX-1596	Picture of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0032		
JX-1597	Picture of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0047		
JX-1598	Picture of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0057		
JX-1599	Picture of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0070		
JX-1600	Picture of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0077		
JX-1601	Picture of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0037		
JX-1602	Picture of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0045		
JX-1603	Picture of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0046		
JX-1604	Picture of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0049		
JX-1605	Picture of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0051		
JX-1606	Picture of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0023		
JX-1607	Video of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0002		
JX-1608	Video of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0006		
JX-1609	Video of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	BRG-NJL6084400-0012		
JX-1610	Picture of AA Schuler Press (partial)	BRG-BUYR503469FA1-0020		
JX-1611	Picture of asset labeled TS-12-4500-108X72	BRG-BUYR503481FA1-0169		
JX-1612	Picture of dies and bolsters for a transfer press	BRG-BUYR503481FA1-0097		
JX-1613	Picture of Emissions systems #4 cupola showing Emissions Building of Defiance	BRG-100098085-0005		
JX-1614	Picture of Emissions systems #4 cupola showing Emissions Building of Defiance	BRG-100098085-0008		
JX-1615	Picture of Emissions systems #4 cupola showing Emissions Building of Defiance	BRG-100098085-0235		
JX-1616	Picture of Lansing Delta Township Assembly Utility Services	BRG-1000378921-0022		
JX-1617	Picture of Painting Building Lines - Process Waste ELPO	BRG-1000378921-0009		

Exhibit C

Exhibit C: Defendants' Exhibit List

DX Number	Exhibit Description	Exhibit Source	Deposition	Deposition Exhibit	Plaintiff's Objections to Exhibit
DX-0001	Proposed Master Sale and Purchase Agreement, dated June 1, 2009	Case No. 09-50026, Docket No. 92-1 Exhibit A			No objection
DX-0002	Amended and Restated Master Sale and Purchase Agreement, dated June 26, 2009	Case No. 09-50026, Docket No. 2649-1			No objection
DX-0003	Debtors' Motion to Obtain Postpetition Financing, dated June 1, 2009	Case No. 09-50026, Docket No. 64			No objection
DX-0004	Debtors' Motion for Approval of the 363 Sale, dated June 1, 2009	Case No. 09-50026, Docket No. 92			No objection
DX-0005	First and Final Application of Evercore Group for Compensation and Reimbursement of Expenses, dated 11/11/09	Worth 9/27/16 Dep., Ex. JPM-EVC-06			Hearsay; Relevance; Authentication
DX-0006	Statement of the U.S. Upon the Commencement of General Motors Corporation's Chapter 11 Case, dated June 1, 2009	Case No. 09-50026, Docket No. 37			Hearsay; Foundation
DX-0007	Order Approving Bidding Procedures and Imposing June 22, 2009 Deadline for Competing Bids, dated June 2, 2009	Case No. 09-50026, Docket No. 274			No objection
DX-0008	\$33,300,000 Secured Superpriority Debtor-In-Possession Credit Agreement, dated June 3, 2009	UST-AAT-004526			No objection
DX-0009	Limited Objection of the Official Committee of Unsecured Creditors to Debtors' Motion to Approve the Sale, dated June 24, 2009	Case No. 09-50026, Docket No. 2362			Hearsay; Foundation
DX-0010	Order Approving DIP Credit Facility, dated June 25, 2009	Case No. 09-50026, Docket No. 2529			No objection
DX-0011	General Motors Corporation, Petition for Bankruptcy, dated June 1, 2009	Case No. 09-50026, Docket No. 1			No objection
DX-0012	General Motors Corporation, Restructuring Plan for Long-Term Viability, dated December 2, 2008	Sheremet 11/15/16 Dep., Ex. JPM-GM 6	Mohatarem; Sheremet	Ex. JPM-GM 6	Hearsay
DX-0013	Email, dated Feb. 17, 2009, attaching General Motors Corporation 2009 - 2014 Restructuring Plan	Mohatarem 11/15/16 Dep., Ex. JPM-GM 7	Mohatarem; Sheremet	Ex. JPM-GM 7	No objection
DX-0014	General Motors Corporation, Form S-4, filed April 27, 2009				No objection
DX-0015	General Motors Corporation, Prospectus Supplement, dated May 19, 2009	Sheremet 11/15/16 Dep., Ex. JPM-GM 9	Mohatarem; Sheremet	Ex. JPM-GM 9	No objection
DX-0016	General Motors Corporation, 2006 Form 10-K				No objection
DX-0017	General Motors Corporation, 2008 Form 10-K				No objection
DX-0018	General Motors Company, Form 8-K, filed July 16, 2009				No objection
DX-0019	General Motors Company, Form 10-Q for quarterly period ending June 30, 2010 (excerpt)				Incomplete
DX-0020	SEC Correspondence regarding Amendment No. 1 to Registration Statement on Form S-1, dated October 14, 2010				Hearsay; Relevance
DX-0021	General Motors Company, 2010 Form 10-K				No objection
DX-0022	Chrysler Group, Form 10, filed February 25, 2011 (excerpt)				Incomplete; Relevance
DX-0023	First Set of Interrogatories of Defendant JPMorgan Chase Bank, N.A. to Plaintiff Motors Liquidation Company Avoidance Action Trust, dated February 25, 2016				No objection
DX-0024	Plaintiff's Responses and Objections to the First Set of Interrogatories of Defendant JPMorgan Chase Bank, N.A., dated April 6, 2016				No objection
DX-0025	Second Set of Interrogatories of Defendant and Cross-Claim Defendant JPMorgan Chase Bank, N.A. to Plaintiff Motors Liquidation Company Avoidance Action Trust, dated July 6, 2016				No objection

DX Number	Exhibit Description	Exhibit Source	Deposition	Deposition Exhibit	Plaintiff's Objections to Exhibit
DX-0026	Plaintiff's Responses and Objections to Defendant JPMorgan Chase Bank, N.A.'s Second Set of Interrogatories, dated August 8, 2016				No objection
DX-0027	Requests for Admission of Defendant and Cross-Claim Defendant JPMorgan Chase Bank, N.A. to Plaintiff Motors Liquidation Company Avoidance Action Trust, dated February 15, 2017				No objection
DX-0028	Third Set of Interrogatories of Defendant and Cross-Claim Defendant JPMorgan Chase Bank, N.A. to Plaintiff Motors Liquidation Company Avoidance Action Trust, dated February 15, 2017				No objection
DX-0029	Letter from Eric Fisher to Marc Wolinsky, dated March 8, 2017				Hearsay; Relevance
DX-0030	Plaintiff's Responses and Objections to JPMorgan Chase Bank, N.A.'s Requests for Admission, dated March 17, 2017				No objection
DX-0031	Excerpt of eFAST (June 2009)	NEWGM000005131			No objection
DX-0032	Excerpt of eFAST (December 2015)	NEWGM000005132			Relevance
DX-0033	Excerpt of eFAST (May 2010)	NEWGM000000747			Relevance
DX-0034	Excerpt of eFAST (May 2010)	NEWGM00005130			Relevance
DX-0035	Fixture Factor Analysis of Eric Stevens	Stevens Initial Report, Ex. 1			Hearsay
DX-0036	Fixture Factor Analysis of John Thomas	Thomas Initial Report, Ex. 1			Hearsay
DX-0037	Fixture Factor Analysis of Max Miller	Miller Initial Report, Ex. 1			Hearsay
DX-0038	Fixture Factor Analysis of Steven Topping	Topping Initial Report, Ex. 1			Hearsay
DX-0039	Fixture Factor Analysis of Daniel Deeds	Deeds Initial Report, Ex. 1			Hearsay
DX-0040	Related Facilities Analysis of John Buttermore	Buttermore Initial Report, Appx. 1			Hearsay
DX-0041	Schematic of Asset 1, OP-150 Select; Check Place Shims Auto Station	NEWGM00123928			No objection
DX-0042	Schematic of Asset 1, OP-150 Select; Check Place Shims Auto Station	NEWGM00123928			No objection
DX-0043	Schematic of Asset 2, GA Pits & Trenches	NEWGM000106377			No objection
DX-0044	Schematic of Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	NEWGM00123928			No objection
DX-0045	Schematic of Asset 4, ELPO Line and ELPO Process Waste	NEWGM000108964			No objection
DX-0046	Delta Assembly Paint Mix Systems	NEWGM000109047			No objection
DX-0047	Schematic of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	NEWGM000109491			No objection
DX-0048	Schematic of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	NEWGM000109492			No objection
DX-0049	Schematic of Asset 6, Paint Dip Conveyor - Elpo Oven IMC	NEWGM000109493			No objection
DX-0050	Programmable Logic Controller with New Controls Architecture	NEWGM000109494			Relevance; Incomplete
DX-0051	Estworks Graphical User Interface, Clearcoat Bell Zone, dated March 8, 2005	NEWGM000109513			Incomplete
DX-0052	Schematic of Asset 9, Paint TC2 CC Bell Zone	NEWGM000109917			No objection
DX-0053	FANUC Robot M-710iC Mechanical Unit Operator's Manual	NEWGM000082164			Incomplete
DX-0054	Fanuc Robotics America, Inc., Generation V - Robot Transport Unit (RTU) Mechanical Assembly, Operation & Maintenance Manual	NEWGM000109934			Incomplete
DX-0055	Fanuc Multi-purpose Intelligent Robot R-2000iA (excerpt)				Foundation; Incomplete
DX-0056	Fanuc Robotics, M-2000iA Series				Foundation; Authentication
DX-0057	Schematic of Asset 13, BS Weld Bus Ducts	NEWGM000105951			No objection
DX-0058	Siemens, Sentron Busway System Selection and Application Guide				Foundation; Authentication; Incomplete
DX-0059	Technical Manual, Mount and Inflate, dated September 2006 (excerpt)	NEWGM000106383			Incomplete
DX-0060	GM Tire Room Conveyors, Operation and Maintenance Manual (excerpt)	NEWGM000106877			Incomplete

DX Number	Exhibit Description	Exhibit Source	Deposition	Deposition Exhibit	Plaintiff's Objections to Exhibit
DX-0061	Mechanical Manual for Turn Table of Asset 16, BS Skid Conveyor - LAZA (excerpt)	NEWGM000106083			Incomplete
DX-0062	Lansing Delta Township Body Shop Area Layout Mezzanine 18 Foot Level	NEWGM000106114			No objection
DX-0063	Operations, Maintenance and Safety Manual, Wheel & Tire Conveyor System (excerpt)	NEWGM000107733			Incomplete
DX-0064	Schematic of Asset 21, GA Conveyor: Skillet - Final - Leg 1	NEWGM000108955			Incomplete
DX-0065	Cross Section Schematic of Asset 21, GA Conveyor: Skillet - Final - Leg 1	NEWGM000108962			Incomplete
DX-0066	Schematic of Asset 22, FANUC M-710IB/70T ROBOT - Assembly	NEWGM00123928			No objection
DX-0067	Schematic of Asset 23, Aluminum Machining System	NEWGM00123928			No objection
DX-0068	Schematic of Asset 24, LFS220 Base Shaping Machine-OP 20 Transfer Drive Gear				Foundation
DX-0069	Schematic of Asset 25, Liebherr Hobbb Machine	NEWGM00123928			No objection
DX-0070	Schematic of Asset 26, Core Delivery Conveyor System CB116 & 122	NEWGM000041540	Levy	Ex. JPM-HCO-24	No objection
DX-0071	Schematic of Asset 27, Emissions System #4 Cupola	NEWGM000041616			No objection
DX-0072	Schematic of Asset 27, Emissions System #4 Cupola	NEWGM000041618			No objection
DX-0073	Process Schematic of Asset 32, AA-11 AA Crossbar Transfer Press	NEWGM000104686	Sofikitis	Ex. JPM-MND-47	No objection
DX-0074	Manual for Asset 32, AA-11 AA Crossbar Transfer Press (excerpt)	NEWGM000095309, NEWGM000096474	Levy	Ex. JPM-HCO-12	Relevance; Incomplete
DX-0075	Manual for Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press (excerpt)	NEWGM000095309, NEWGM000095623	Sofikitis	Ex. JPM-MND-3	Relevance; Incomplete
DX-0076	Manual for Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press (excerpt)	NEWGM000095309, NEWGM000096450			Relevance; Incomplete
DX-0077	Manual for Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press (excerpt)	NEWGM000096455, NEWGM000096458			Relevance; Incomplete
DX-0078	Schematic of Asset 35, Button Up And Test Conveyor System	NEWGM00123928			No objection
DX-0079	Schematic of Asset 36, Helical Broaching Equipment	NEWGM000123928			No objection
DX-0080	ABB Flexible Automation AB, Product Manual IRB 6400 M97A, On-line Manual (excerpt)	NEWGM000042561			Incomplete
DX-0081	Schematic of Asset 40, P & H 7 1/2 Ton Charger Crane 6E Cupola	NEWGM000043365			No objection
DX-0082	Schematic of Willow Run Press Removals	Levy 9/19/16 Dep., Ex. JPM-HCO-24			No objection
DX-0083	Satellite Imagery of Flint North (Building 11, Factory 31) as of Specified Dates				Untimely; Relevance; Authentication; Foundation; Hearsay
DX-0084	Satellite Imagery of Flint North (Building 36) as of Specified Dates				Untimely; Relevance; Authentication; Foundation; Hearsay
DX-0085	Satellite Imagery of Grand Rapids Stamping as of Specified Dates				Untimely; Relevance; Authentication; Foundation; Hearsay
DX-0086	Satellite Imagery of Lansing Car Assembly as of Specified Dates				Untimely; Relevance; Authentication; Foundation; Hearsay
DX-0087	Satellite Imagery of Lansing Craft Center as of Specified Dates				Untimely; Relevance; Authentication; Foundation; Hearsay

DX Number	Exhibit Description	Exhibit Source	Deposition	Deposition Exhibit	Plaintiff's Objections to Exhibit
DX-0088	Satellite Imagery of Lansing Metal Center as of Specified Dates				Untimely; Relevance; Authentication; Foundation; Hearsay
DX-0089	Satellite Imagery of Mansfield Metal Center as of Specified Dates				Untimely; Relevance; Authentication; Foundation; Hearsay
DX-0090	Satellite Imagery of Moraine Assembly as of Specified Dates				Untimely; Relevance; Authentication; Foundation; Hearsay
DX-0091	Satellite Imagery of Pontiac East Assembly as of Specified Dates				Untimely; Relevance; Authentication; Foundation; Hearsay
DX-0092	Satellite Imagery of Willow Run Transmission as of Specified Dates				Untimely; Relevance; Authentication; Foundation; Hearsay
DX-0093	Recent Satellite Imagery for Sites of Four Demolished GM Stamping Plants				Untimely; Relevance; Authentication; Foundation; Hearsay
DX-0094	Global Manufacturing and Labor Presentation, dated February 10, 2009	EVR 025371			No objection
DX-0095	GM Corporate Newsroom, Spring Hill Manufacturing, dated February 3, 2017	Goesling 2/8/17 Dep., Ex. Goesling 51			Hearsay; Relevance; Foundation
DX-0096	Bid Announcement, RACER Trust - Willow Run Press Removal and Partial Strip Out, dated March 2012, attaching Request for Proposal (excerpt)	007639, 007532			No objection
DX-0097	Email chain, dated June 30, 2011, regarding WR rigging expectations	7832			No objection
DX-0098	Email chain, dated February 17, 2012, regarding offer for GM Indy	Levy 9/19/16 Dep., Ex. JPM-HCO-12			No objection
DX-0099	Maynards, Types of Appraisals	Sofikitis 8/31/16 Dep., Ex. JPM-MIND-3			No objection
DX-0100	Analysis of Goesling Press System Moves	Miller 1/26/17 Dep., Ex. AAT-Miller 23			No objection
DX-0101	Cincinnati Ins. Co. v. Fed. Ins. Co., 166 F. Supp. 2d 1172 (E.D. Mich. 2001)	Weigel 11/15/16 Dep., Ex. JPM-Weigel-1			Caselaw; Relevance
DX-0102	Defendant Galaxy Machine and Retrofit's Motion for Summary Judgment, Cincinnati Ins. Co. v. Fed. Ins. Co.	Weigel 11/15/16 Dep., Ex. JPM-Weigel-4			Hearsay; Relevance
DX-0103	Exhibit 5 to Defendant Galaxy Machine and Retrofit's Motion for Summary Judgment, Cincinnati Ins. Co. v. Fed. Ins. Co.	Weigel 11/15/16 Dep., Ex. JPM-Weigel-3			Hearsay; Relevance; Illegible
DX-0104	Summary of Scrap Value in Goesling Report	Goesling 2/7/17 Dep., Ex. Goesling 46			Hearsay; Relevance;
DX-0105	Mich. Dept of Treas. Form L-4175 (1972)				Authenticity; Foundation; Relevance; Hearsay
DX-0106	Mich. Dept of Treas. Form L-4175 (2006)				Relevance
DX-0107	Mich. Dept of Treas. Form L-4175 (2009)	Furey; Voigt Mohatarem; Sheremet; Voigt		Ex. JPM-KPMG-1 Ex. JPM-GM-10; Ex. JPM-KPMG-9	No objection
DX-0108	State Tax Commission Bulletin No. 12 of 1999, New Personal Property Multiplier Tables and Other New Procedures for Valuing Personal Property				Relevance
DX-0109	Chart of Plaintiff's Fixture Classifications and General Motors Property Tax Classifications	NEWGM000007883.xlsx; NEWGM000005131.xlsx; List provided by plaintiff's counsel on April 6, 2016 (as amended)	Voigt	Ex. AAT-KPMG-4	Relevance

DX Number	Exhibit Description	Exhibit Source	Deposition	Deposition Exhibit	Plaintiff's Objections to Exhibit
DX-0110	Chart of Plaintiff's Fixture Classifications and General Motors Property Tax Classifications (revised)	NEWGM000007883.xlsx; NEWGM000127279.xlsx; NEWGM000005131.xlsx; List provided by plaintiff's counsel on April 6, 2016 (as amended)			Relevance
DX-0111	Email chain, dated November 13, 2006, regarding GM fixture filings (offered provisionally and without prejudice to the positions taken in defendants' motions in limine)	JPMCB-5-00110936			Relevance
DX-0112	Email chain, dated November 14, 2006, regarding GM fixture filings (offered provisionally and without prejudice to the positions taken in defendants' motions in limine)	JPMCB-5-00106041	Voigt	Ex. JPM-KPMG-8	Relevance
DX-0113	Email chain, dated November 15, 2006, regarding GM (offered provisionally and without prejudice to the positions taken in defendants' motions in limine)	JPMCB-5-00066231			Relevance
DX-0114	Email chain, dated November 15, 2006, regarding GM fixture filings, attaching fixture filings spreadsheet (offered provisionally and without prejudice to the positions taken in defendants' motions in limine)	JPMCB-5-00066029			Relevance; Incomplete
DX-0115	Email chain, dated November 15, 2006, regarding GM fixture filings (offered provisionally and without prejudice to the positions taken in defendants' motions in limine)	JPMCB-5-00065931	Furey	Ex. JPM-KPMG-3	Relevance; Incomplete
DX-0116	Email chain, dated November 15, 2006, regarding GM fixture filings (offered provisionally and without prejudice to the positions taken in defendants' motions in limine)	JPMCB-5-00066262	Voigt	Ex. JPM-KPMG-7	Relevance; Incomplete
DX-0117	Email chain, dated November 17, 2006, regarding GM Credit Agreement (offered provisionally and without prejudice to the positions taken in defendants' motions in limine)	JPMCB-5-00104704	Furey	Ex. JPM-KPMG-15	Relevance; Incomplete
DX-0118	Email chain, dated December 22, 2006, regarding GM Fixture Filings (offered provisionally and without prejudice to the positions taken in defendants' motions in limine)	JPMCB-5-00066907			Relevance
DX-0119	Email chain, dated December 8, 2006, regarding GM Lien Searches	Burshine 10/26/17 Dep., Ex. JPM-Weil-7 (CSM0000818)			Relevance
DX-0120	Email chain, dated November 14, 2006, regarding GM Lien Searches	Burshine 10/26/17 Dep., Ex. JPM-Weil-43 (CSM00008753)			Relevance
DX-0121	Delta Township Assessor Information – 8175 Millett Highway	Expert Report of James Marquardt, November 23, 2016, Exs. 1 & 2	Furey	Ex. JPM-KPMG-13	No objection
DX-0122	Delta Township 2009 Tax Maps (enlarged)	Mollhagen 1/30/17 Dep., Ex. Mollhagen 4			Relevance; Foundation; Hearsay
DX-0123	Eaton County Register of Deeds – Results of grantor-grantee search	Expert Report of James Marquardt, November 23, 2016, Ex. 4			Best Evidence; Authentication; Foundation; Incomplete
DX-0124	Eaton County Register of Deeds – Documents responsive to grantor-grantee search (excerpt)	Expert Report of James Marquardt, November 23, 2016, Ex. 5			Relevance; Incomplete; Foundation
DX-0125	Eaton County Fixture Filing – UCC-1 – Liber 2113, Page 660	Expert Report of James Marquardt, November 23, 2016, Ex. 6	Mitocic; Starzecki	Ex. JPM/Deloitte 3	No objection
DX-0126	Delta Township Assessor Information – 8001 Davis Highway	Expert Report of James Marquardt, November 23, 2016, Ex. 8			No objection

DX Number	Exhibit Description	Exhibit Source	Deposition	Deposition Exhibit	Plaintiff's Objections to Exhibit
DX-0127	Fixture filings recorded in connection with the Term Loan	Exhibit J to the Affidavit of Richard W. Duker in Support of Defendant JPMorgan Chase Bank, N.A.'s Motion for Summary Judgment, filed July 1, 2010, Case No. 09-00504, Docket Nos. 37-2, 37-3	Starzecki	Ex. JPM/Deloitte 15	No objection
DX-0128	Email chain, dated September 9, 2010, regarding fixtures	AAT00057783			Relevance
DX-0129	Letter from Eric Fisher to Lawrence S. Buonomo of General Motors Company, dated February 2, 2010	AAT00057961			Relevance
DX-0130	Email, dated January 17, 2017, regarding Motors - Additional Facilities		Starzecki	Ex. JPM/Deloitte 16	Relevance
DX-0131	Oakland County Map of Current Tax Parcel Numbers for Land Containing MFD Pontiac and Powertrain Engineering Pontiac	Expert Report of James Marquardt, November 23, 2016, Ex. 10			Foundation; Authentication; Hearsay
DX-0132	Oakland County Tax Lineage - Parcel 14-21-102-001	Expert Report of James Marquardt, November 23, 2016, Ex. 11			Hearsay; Foundation
DX-0133	Oakland County Tax Lineage - Parcel 14-17-476-002	Expert Report of James Marquardt, November 23, 2016, Ex. 12			Hearsay; Foundation
DX-0134	Oakland County Register of Deeds Information - deeds conveying parcels 14-21-101-004 and 14-16-376-007	Expert Report of James Marquardt, November 23, 2016, Exs. 13-16	Starzecki	Ex. JPM/Deloitte 4	Foundation; Relevance; Authentication (handwritten notes); Incomplete
DX-0135	Oakland County Aerial Maps - Parcels 14-21-101-004 and 14-16-176-007	Expert Report of James Marquardt, November 23, 2016, Exs. 17-18	Furey	Ex. JPM-KPMG-2	Foundation; Authentication; Relevance; Hearsay
DX-0136	Satellite Imagery for Pontiac North Campus as of (a) May 22, 2009 and (b) June 16, 2009				Untimely; Hearsay; Foundation; Authentication; Relevance
DX-0137	Stipulation Regarding Surveyed Metes and Bounds, dated January 10, 2017 (excerpt)	Case No. 09-00504, Docket No. 827			No objection
DX-0138	R.J. King, GM consolidation adds 1,300 more from Flint; Automaker also plans tech park in Pontiac, Detroit News (June 2, 2002)				No objection
DX-0139	Thomas E. Bonsail, Pontiac: The Complete History, 1926-1976 (excerpt)				Foundation; Incomplete; Hearsay
DX-0140	General Motors Corporation, Current Conditions Report, Pontiac North Campus, Volume I of IV, dated June 31, 2001 (excerpt)				Hearsay; Relevance; Incomplete; Foundation
DX-0141	KPMG Valuation of Total Invested Capital and Certain Assets, Liabilities and Equity Interests of General Motors Company	Furey 9/23/16 Dep., Ex. JPM-KPMG-1			Relevance
DX-0142	KPMG Support for Fresh Start Valuation, 2A. Total Invested Capital ("TIC")	Voigt 9/26/16 Dep., Ex. JPM-KPMG-9			Relevance
DX-0143	KPMG Support for Fresh Start Valuation, 2B. Polska, GMDAT and SSGMW	KPMG-GM00000296			Relevance
DX-0144	KPMG Support for Fresh Start Valuation, 3. Weighted Average Cost of Capital	KPMG-GM00000343			Relevance
DX-0145	KPMG Support for Fresh Start Valuation, 6A. Machinery and Equipment	KPMG-GM00000714			Relevance
DX-0146	KPMG Support for Fresh Start Valuation, 6B.1. Real Property	KPMG-GM00000896			Relevance; Incomplete
DX-0147	KPMG Support for Fresh Start Valuation, 19. Preferred Stock and Warrants	KPMG-GM00003557			Relevance
DX-0148	KPMG memorandum regarding Fair Value Balance Sheet Reconciliation Process, dated April 29, 2010	Voigt 9/26/2016 Dep., Ex. JPM-KPMG 8			Relevance
DX-0149	KPMG Asset Valuation Worksheet for Buildings and Improvements (excerpt)	KPMG-GM0003703			Relevance; Incomplete

DX Number	Exhibit Description	Exhibit Source	Deposition	Deposition Exhibit	Plaintiff's Objections to Exhibit
DX-0150	KPMG Asset Valuation Worksheet for Buildings and Improvements (excerpt)	KPMG-GM0003703			Relevance; Incomplete
DX-0151	KPMG Asset Valuation Worksheet for Personal Property (excerpt)	NEWGM00000949			Hearsay; Relevance; Foundation; Incomplete
DX-0152	Reconciliation Schedule for the Fair Value Balance Sheet of General Motors Company	Cruz 11/10/16 Dep., Ex. JPM-KPMG-7			Relevance
DX-0153	KPMG memorandum regarding Cost Benchmarking Analysis, dated February 22, 2009	Furey 9/23/16 Dep., Ex. JPM KPMG 15			Relevance
DX-0154	KPMG Spreadsheet on Capacity Utilization (excerpt)	KPMG-GM0004130			Relevance; Incomplete
DX-0155	KPMG Spreadsheet on Capacity Utilization (excerpt)	KPMG-GM0004130			Relevance
DX-0156	KPMG memorandum regarding Capacity Utilization Analysis, dated January 14, 2010	KPMG-GM0092434			Relevance
DX-0157	KPMG Department of Professional Practice, Accounting for Business Combinations and Noncontrolling Interests, dated January 2012 (excerpt)				Hearsay; Relevance; Foundation
DX-0158	Notes from Meetings with KPMG Personnel and GM Personnel, dated June 18, 2009	KPMG-GM0004121			Relevance
DX-0159	General Motors Corporation, Financial Policy Series, Accounting Policy, Real Estate, Plant and Equipment, Section 32, dated July 2002	KPMG-GM0003928			No objection
DX-0160	General Motors Corporation, Financial Policy Series, Accounting Policy, Real Estate, Plant and Equipment, Section 32, dated July 2002 (revised)	KPMG-GM00003939			No objection
DX-0161	Deloitte memorandum regarding Scoping Considerations, dated March 11, 2010	DT 0006218			Relevance
DX-0162	Deloitte memorandum regarding Findings for procedures associated with Fresh Start Accounting, dated April 5, 2010	Miocic 10/28/16 Dep., Ex. JPM/Deloitte 3			Relevance
DX-0163	Deloitte memorandum regarding PP&E Valuation, dated March 23, 2010	DT 0000037			Relevance
DX-0164	Deloitte memorandum regarding Auditing of GMNA Forecasts, dated December 29, 2009	Starzecki 8/12/16 Dep., Ex. JPM/Deloitte 15			Relevance
DX-0165	Deloitte memorandum regarding Technology Valuation, dated January 31, 2010	DT 0006498			Relevance
DX-0166	Memorandum regarding GM Fresh Start Debt Valuation Methodology and Conclusions	DT 0006853			Relevance
DX-0167	Fresh Start Valuation, Non-Vehicle Revenue Breakout	Starzecki 8/12/16 Dep., Ex. JPM/Deloitte 16			Relevance
DX-0168	Deloitte Spreadsheet of General Motors Company's opening balance sheet	DT 0007109			Relevance
DX-0169	PwC memorandum regarding General Motors' credit rating and fair value of debt, dated September 29, 2009	PwC0000046			Relevance
DX-0170	Ernst & Young, Bankruptcies, liquidations and quasi-reorganizations (October 2014) (excerpt)				Hearsay; Relevance; Foundation; Incomplete
DX-0171	Statement of Financial Accounting Standards No. 141 (revised 2007)	Starzecki 8/12/16 Dep., Ex. JPM/Deloitte 4			No objection
DX-0172	Statement of Financial Accounting Standards No. 157	Furey 9/23/2016 Dep., Ex. JPM-KPMG-2			No objection
DX-0173	Statement of Financial Accounting Standards No. 141				No objection
DX-0174	Illustration of KPMG's Valuation Steps for the Fresh Start Representative Assets	Lakhani Initial Report, Ex. 1A			Hearsay; Relevance; Foundation; Prejudice
DX-0175	KPMG's Valuation Steps for Fresh Start Representative Assets: Individual Asset Summary	Lakhani Initial Report, Ex. 1B			Hearsay; Relevance; Foundation; Prejudice

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DX-0176	Illustration of KPMG's Valuation Steps for Fixtures that KPMG Valued	Lakhani Initial Report, Ex. 2			Hearsay; Relevance; Foundation; Prejudice
DX-0177	Final RCNLD Sensitivity Analysis for 40 Representative Assets	Lakhani Initial Report, Ex. 3A			Hearsay; Relevance; Foundation; Prejudice
DX-0178	Final RCNLD Sensitivity Analysis for 40 Representative Assets: Individual Asset Summary	Lakhani Initial Report, Ex. 3B			Hearsay; Relevance; Foundation; Prejudice
DX-0179	Final RCNLD Sensitivity Analysis - Alternative Age-Life Treatment	Lakhani Initial Report, Ex. 3C			Hearsay; Relevance; Foundation; Prejudice
DX-0180	Final RCNLD Sensitivity Analysis - 2008-2014 Capacity Utilization Data	Lakhani Initial Report, Ex. 3D			Hearsay; Relevance; Foundation; Prejudice
DX-0181	Final RCNLD Sensitivity Analysis - Ex-GM Expert NULs	Lakhani Initial Report, Ex. 3E			Hearsay; Relevance; Foundation; Prejudice
DX-0182	Final RCNLD Sensitivity Analysis - Deloitte Minimum Percent Good	Lakhani Initial Report, Ex. 3F			Hearsay; Relevance; Foundation; Prejudice
DX-0183	Final RCNLD Sensitivity Analysis - All Scenarios Combined	Lakhani Initial Report, Ex. 3G			Hearsay; Relevance; Foundation; Prejudice
DX-0184	Final RCNLD Sensitivity Analysis for Fixtures that KPMG Valued	Lakhani Initial Report, Ex. 4			Hearsay; Relevance; Foundation; Prejudice
DX-0185	Illustration of KPMG's TIC-Based Adjustment for GMNA	Lakhani Initial Report, Ex. 5			Hearsay; Relevance; Foundation; Prejudice
DX-0186	KPMG Post-TIC Adjustment Sensitivity Analysis for Fresh Start Representative Assets	Lakhani Initial Report, Ex. 7A			Hearsay; Relevance; Foundation; Prejudice
DX-0187	KPMG Post-TIC Adjustment Sensitivity Analysis for Fixtures that KPMG Valued	Lakhani Initial Report, Ex. 7B			Hearsay; Relevance; Foundation; Prejudice
DX-0188	New GM and Chrysler Purchase Price Allocation Comparison	Lakhani Initial Report, Ex. 8			Hearsay; Relevance; Foundation; Prejudice
DX-0189	Effect of Other Assets' and Liabilities' Value on the Value of GMNA PP&E	Lakhani Initial Report, Ex. 9			Hearsay; Relevance; Foundation; Prejudice
DX-0190	Valuation of Assets at GM Powertrain Tonawanda	NEWGM000000949			Hearsay; Relevance; Foundation; Prejudice
DX-0191	Valuation Supporting Materials, dated May 31, 2009	Worth 9/27/16 Dep., Ex. JPM-EVC-25			Relevance
DX-0192	U.S. Vehicle Sales, Annual and Monthly (SAAR), 2000-2009	Hubbard Initial Report, Ex. 1			Hearsay; Relevance; Foundation; Prejudice
DX-0193	Historical GMNA Revenue	Hubbard Initial Report, Ex. 2			Hearsay; Relevance; Foundation; Prejudice
DX-0194	Historical GMNA Operating Income	Hubbard Initial Report, Ex. 3			Hearsay; Relevance; Foundation; Prejudice
DX-0195	Historical GM Liquidity	Hubbard Initial Report, Ex. 4			Hearsay; Relevance; Foundation; Prejudice
DX-0196	GM Bankruptcy Timeline	Hubbard Initial Report, Ex. 5			Hearsay; Relevance; Foundation; Prejudice
DX-0197	Viability Plan Comparison	Hubbard Initial Report, Ex. 6			Hearsay; Relevance; Foundation; Prejudice
DX-0198	Overview of Section 363(b) Transaction	Hubbard Initial Report, Ex. 7			Hearsay; Relevance; Foundation; Prejudice

DX Number	Exhibit Description	Exhibit Source	Deposition	Deposition Exhibit	Plaintiff's Objections to Exhibit
DX-0199	Section 363 Sale, Credit Bid Detail	Hubbard Initial Report, Ex. 8			Hearsay; Relevance; Foundation; Prejudice
DX-0200	U.S. Treasury's Total Funds Committed to GM	Hubbard Initial Report, Ex. 9			Hearsay; Relevance; Foundation; Prejudice
DX-0201	Canadian Funds Committed to GM	Hubbard Initial Report, Ex. 10			Hearsay; Relevance; Foundation; Prejudice
DX-0202	Evercore's Estimate of Section 363(b) Purchase Price	Hubbard Initial Report, Ex. 11			Hearsay; Relevance; Foundation; Prejudice
DX-0203	Proceeds From U.S. Treasury's Sales of New GM Securities	Hubbard Initial Report, Ex. 12			Hearsay; Relevance; Foundation; Prejudice
DX-0204	KPMG's Calculation of New GM's Total Invested Capital	Hubbard Initial Report, Ex. 13			Hearsay; Relevance; Foundation; Prejudice
DX-0205	KPMG's Calculation of New GM's Fair Value Balance Sheet	Hubbard Initial Report, Ex. 14			Hearsay; Relevance; Foundation; Prejudice
DX-0206	KPMG WACC Calculation for GMNA	Hubbard Initial Report, Ex. 15			Hearsay; Relevance; Foundation; Prejudice
DX-0207	Comparison of WACC Estimates, April 27, 2009-July 10, 2009	Hubbard Initial Report, Ex. 16			Hearsay; Relevance; Foundation; Prejudice
DX-0208	Comparison of WACC Estimates for Peer Companies	Hubbard Initial Report, Ex. 17			Hearsay; Relevance; Foundation; Prejudice
DX-0209	Comparison of Analyst WACC Estimates for Old and New GM	Hubbard Initial Report, Ex. 18			Hearsay; Relevance; Foundation; Prejudice
DX-0210	Comparison of WACC Estimates for Companies that Emerge from Bankruptcy 2005-2010	Hubbard Initial Report, Ex. 19			Hearsay; Relevance; Foundation; Prejudice
DX-0211	Comparison of WACC Estimates for Companies that Adopted Fresh Start Accounting 2009-2014	Hubbard Initial Report, Ex. 20			Hearsay; Relevance; Foundation; Prejudice
DX-0212	Comparison of Cost of Equity for Peer Companies	Hubbard Initial Report, Ex. 21			Hearsay; Relevance; Foundation; Prejudice
DX-0213	Comparison of Distressed Company Risk Premia	Hubbard Initial Report, Ex. 22			Hearsay; Relevance; Foundation; Prejudice
DX-0214	Year-over-Year Percent Changes in U.S. Auto Sales and GDP, 1973-2015	Hubbard Initial Report, Ex. 23			Hearsay; Relevance; Foundation; Prejudice
DX-0215	GDP Growth in India, China, the U.S., the E. U. and Other Countries, Q1 2005-Q4 2010	Hubbard Initial Report, Ex. 24			Hearsay; Relevance; Foundation; Prejudice
DX-0216	Indexed U.S. Auto Sales During the Financial Crisis and Previous Downturns	Hubbard Initial Report, Ex. 25			Hearsay; Relevance; Foundation; Prejudice
DX-0217	Selected New GM Debt & Preferred Equity Coupon Rates	Hubbard Initial Report, Ex. 26			Hearsay; Relevance; Foundation; Prejudice
DX-0218	2009 Credit Ratings and Capital Structures of GM's Peer Companies	Hubbard Initial Report, Ex. 27			Hearsay; Relevance; Foundation; Prejudice
DX-0219	New GM's Credit Ratings Post-Bankruptcy	Hubbard Initial Report, Ex. 28			Hearsay; Relevance; Foundation; Prejudice
DX-0220	GM's Projection of U.S. Auto Sales Compared to Historical Recoveries	Hubbard Initial Report, Ex. 29			Hearsay; Relevance; Foundation; Prejudice
DX-0221	U.S. Auto Sales Projections by Industry and Peers	Hubbard Initial Report, Ex. 30			Hearsay; Relevance; Foundation; Prejudice

DX Number	Exhibit Description	Exhibit Source	Deposition	Deposition Exhibit	Plaintiff's Objections to Exhibit
DX-0222	Comparison of Actual U.S. Auto Sales to VP4 Projections	Hubbard Initial Report, Ex. 31			Hearsay; Relevance; Foundation; Prejudice
DX-0223	Comparison of Actual GM Revenue to Projections	Hubbard Initial Report, Ex. 32			Hearsay; Relevance; Foundation; Prejudice
DX-0224	Comparison of Actual GMNA Revenue to Projections	Hubbard Initial Report, Ex. 33			Hearsay; Relevance; Foundation; Prejudice
DX-0225	Comparison of Actual GMNA Market Share to Projections	Hubbard Initial Report, Ex. 34			Hearsay; Relevance; Foundation; Prejudice
DX-0226	Comparison of Actual GMNA Auto Sales to Projections	Hubbard Initial Report, Ex. 35			Hearsay; Relevance; Foundation; Prejudice
DX-0227	Comparison of Actual and Projected GMNA Revenue	Hubbard Initial Report, Ex. 36			Hearsay; Relevance; Foundation; Prejudice
DX-0228	Comparison of Actual and Projected EBIT	Hubbard Initial Report, Ex. 37			Hearsay; Relevance; Foundation; Prejudice
DX-0229	Comparison of Actual and Projected EBIT Margin	Hubbard Initial Report, Ex. 38			Hearsay; Relevance; Foundation; Prejudice
DX-0230	Comparison of Free Cash Flow Scenarios to Cash Obligations	Hubbard Initial Report, Ex. 40			Hearsay; Relevance; Foundation; Prejudice
DX-0231	Comparison of Free Cash Flow Scenarios to Cash Obligations Assuming Refinance	Hubbard Initial Report, Ex. 41			Hearsay; Relevance; Foundation; Prejudice
DX-0232	Comparison of Projected Free Cash Flow to Cash Obligations by Year	Hubbard Initial Report, Ex. 42			Hearsay; Relevance; Foundation; Prejudice
DX-0233	Comparison of Projected Free Cash Flow (Fixed Percentage Adjustment Scenario) to Cash Obligations by Year	Hubbard Initial Report, Ex. 43			Hearsay; Relevance; Foundation; Prejudice
DX-0234	Comparison of Projected Free Cash Flow (Fixed Dollar Adjustment Scenario) to Cash Obligations by Year	Hubbard Initial Report, Ex. 44			Hearsay; Relevance; Foundation; Prejudice
DX-0235	Comparison of PP&E as a Percentage of Last 12 Months Revenue, as of December 31, 2008	Hubbard Initial Report, Ex. 45			Hearsay; Relevance; Foundation; Prejudice
DX-0236	Comparison of PP&E as a Percentage of Total Assets, as of June 30, 2009	Hubbard Initial Report, Ex. 46			Hearsay; Relevance; Foundation; Prejudice
DX-0237	Comparison of PP&E as a Percentage of Last 12 Months Revenue, as of December 31, 2008	Hubbard Initial Report, Ex. 47			Hearsay; Relevance; Foundation; Prejudice
DX-0238	Comparison of PP&E as a Percentage of Last 12 Months Revenue, as of June 30, 2009	Hubbard Initial Report, Ex. 48			Hearsay; Relevance; Foundation; Prejudice
DX-0239	New GM and Chrysler PP&E as a Percentage of Total Assets Comparison	Hubbard Initial Report, Ex. 49			Hearsay; Relevance; Foundation; Prejudice
DX-0240	New GM and Chrysler PP&E Breakdown Comparison	Hubbard Initial Report, Ex. 50			Hearsay; Relevance; Foundation; Prejudice
DX-0241	List of 34 MLC Bonds and Prices, as of July 10, 2009	Hubbard Initial Report, Ex. 51			Hearsay; Relevance; Foundation; Prejudice
DX-0242	Average Trading Price of MLC Bonds, January 1, 2009 to April 20, 2011	Hubbard Initial Report, Ex. 52			Hearsay; Relevance; Foundation; Prejudice
DX-0243	Percentage Variation in Claim-Adjusted MLC Bond Prices	Hubbard Initial Report, Ex. 53			Hearsay; Relevance; Foundation; Prejudice
DX-0244	Components of Weighted Average Cost of Capital	Hubbard Initial Report, Ex. 54			Hearsay; Relevance; Foundation; Prejudice

DX Number	Exhibit Description	Exhibit Source	Deposition	Deposition Exhibit	Plaintiff's Objections to Exhibit
DX-0245	Cost of Debt by Credit Rating	Hubbard Initial Report, Ex. 55			Hearsay; Relevance; Foundation; Prejudice
DX-0246	U.S. Treasury Transaction Value	Hubbard Rebuttal Report, Ex. 1	Feldman	Ex. JD-UST-10	Hearsay; Relevance; Foundation; Prejudice
DX-0247	KPMG Calculation of New GM TIC Adjustment	NEWGM000000189-746 (summary)	Feldman	Ex. JD-UST-11	Hearsay; Relevance; Foundation
DX-0248	KPMG Calculation of New GM TIC Adjustment with TIC Components	NEWGM000000189-746 (summary)			Hearsay; Relevance; Foundation
DX-0249	KPMG Calculation of GMNA TIC Adjustment	NEWGM000000189-746 (summary)			Hearsay; Relevance; Foundation
DX-0250	KPMG Calculation of GMNA TIC Adjustment with TIC Components	NEWGM000000189-746 (summary)			Hearsay; Relevance; Foundation
DX-0251	Comparison of Estimates of New GM Common Equity Value	NEWGM000000189-746; Hubbard Initial Report; Declaration of Stephen Worth; Fischel Rebuttal Report (summary)			Hearsay; Relevance; Foundation
DX-0252	WACC Sensitivity Analysis for Fresh Start Representative Assets	NEWGM0000000949; KPMG-GM0003703; NEWGM000000747			Hearsay; Relevance; Foundation
DX-0253	U.S. Vehicle Sales History, 1979-2009	Keller Initial Report, Chart 1	Koch	Ex. JPM-Alix-27	Hearsay; Relevance; Foundation; Prejudice
DX-0254	Summary of U.S. Total Industry Forecasts	Keller Initial Report, Chart 2			Hearsay; Relevance; Foundation; Prejudice
DX-0255	Relationship of Light Weight Vehicle Sales and Recessions	Keller Initial Report, Chart 3	Mohatarem	Ex. JPM-GM-12	Hearsay; Relevance; Foundation; Prejudice
DX-0256	Historical Recoveries in U.S. Light Vehicle Sales	Keller Initial Report, Chart 4	Mohatarem	Ex. JPM-GM-13	Hearsay; Relevance; Foundation; Prejudice
DX-0257	GMNA KPMG Income Statement (Highlights) 2009-2014	Keller Initial Report, Chart 5			Hearsay; Relevance; Foundation; Prejudice
DX-0258	Comparison of GMNA Actual and Forecasted Financial Metrics	Keller Initial Report, Chart 6			Hearsay; Relevance; Foundation; Prejudice
DX-0259	General Motors Unit Sales and Dealership Statistics	Keller Initial Report, Chart 7			Hearsay; Relevance; Foundation; Prejudice
DX-0260	Proportion of Fleet Registrations to Sales for Model Year 2009	Keller Initial Report, Chart 8			Hearsay; Relevance; Foundation; Prejudice
DX-0261	Comparison of GMNA Actual and Projected Sales and Market Share	Keller Initial Report, Chart 9			Hearsay; Relevance; Foundation; Prejudice
DX-0262	Manheim Used Vehicle Value Index	Keller Initial Report, Chart 10			Hearsay; Relevance; Foundation; Prejudice
DX-0263	Comparison of U.S. Total Vehicle Sales and Consumer Sentiment	Keller Initial Report, Chart 11			Hearsay; Relevance; Foundation; Prejudice
DX-0264	Projected Growth Rates, 2009-2011	Keller Initial Report, Chart 12			Hearsay; Relevance; Foundation; Prejudice
DX-0265	General Motors U.S. Light Vehicle Sales by Brand	Keller Initial Report, Chart 13			Hearsay; Relevance; Foundation; Prejudice
DX-0266	Comparison of U.S. Gas Prices and Small Car Share of Light Vehicle Segment	Keller Initial Report, Chart 14			Hearsay; Relevance; Foundation; Prejudice
DX-0267	J.P. Morgan, Equity Research regarding General Motors (May 7, 2009)				Hearsay; Foundation; Authentication
DX-0268	Citibank analysis regarding potential ratings agencies' assesment of New GM	DT 0006926			Relevance
DX-0269	Moody's, Introducing Moody's Credit Transition Model (August 2007)				Hearsay; Foundation; Authentication

DX Number	Exhibit Description	Exhibit Source	Deposition	Deposition Exhibit	Plaintiff's Objections to Exhibit
DX-0270	Standards & Poors, General Motors Corp.'s Recovery Rating Profile (April 10, 2009)	DF0003532			No objection
DX-0271	Office of the Special Inspector General for the Troubled Asset Relief Program, Quarterly Report to Congress, dated April 30, 2014 (excerpt)				Incomplete; Hearsay
DX-0272	U.S. Treasury Press Release, Treasury Sells Final Shares of GM Common Stock				Hearsay; Relevance; Foundation
DX-0273	Congressional Budget Office, The Troubled Asset Relief Program: Report on Transactions Through June 17, 2009, dated June, 2009				Hearsay
DX-0274	Carol Rapaport, The Effect of Firm Bankruptcy on Retiree Benefits, with Applications to the Automotive and Coal Industries, Congressional Research Service (September 22, 2014)				Hearsay
DX-0275	Deutsche Bank, Reinvented GM on the Horizon (April 2, 2009)				Hearsay; Foundation; Authentication
DX-0276	Remarks by the President on the American Automotive Industry, dated March 30, 2009				Hearsay
DX-0277	Statement of Ron Bloom before the Congressional Oversight Panel Regarding Treasury's Automotive Industry Financing Program (AIFP), dated July 27, 2009				Hearsay
DX-0278	GM Presentation to U.S. Treasury regarding UAW and VEBA, dated May 18, 2009	UST-AAT-024910			Relevance
DX-0279	General Motors presentation to U.S. Treasury regarding DIP/Exit Funding Estimates, dated May 25, 2009	UST-AAT-029785			No objection
DX-0280	Letter from General Motors Corporation, attaching Presentation to U.S. Treasury regarding Financing Terms, Schedules and Covenant Details, dated June 4 2009	UST-AAT-029615			No objection
DX-0281	GM February 17 Plan Viability Determination; White House Fact Sheet, Obama Administration New Path to Viability for GM & Chrysler	Case No. 09-500026, Docket No. 2577-1, Exhibit B			Hearsay
DX-0282	Statement of President Bush on Auto Industry Rescue, dated December 19, 2008				Hearsay
DX-0283	Statement by Timothy Geithner before the Senate Banking Committee, dated May 20, 2009				Hearsay
DX-0284	General Motors Corporation Press Release, GM to Bolster Liquidity by \$15 Billion through 2009 (July 15, 2008)	General Motors Corporation, Form 8-K, filed July 15, 2008			Hearsay; Foundation
DX-0285	General Motors presentation for conference call with analysts and media regarding the 2007 GM-UAW Labor Agreement	General Motors Corporation, Form 8-K, filed October 15, 2007, Exhibit 10.3.			Hearsay; Foundation; Relevance
DX-0286	Touhy Affidavit for Matthew Feldman Deposition, dated September 16, 2016				Hearsay; Relevance
DX-0287	Automotive News Data Center, North America Car and Truck Production				Foundation; Authentication; Hearsay
DX-0288	Center for Automotive Research, Contribution of the Automotive Industry to the Economies of All Fifty States and the United States (April 2010)				Hearsay; Foundation; Authentication
DX-0289	Prepared testimony of Alan R. Mulally before the Senate Banking Committee, dated December 4, 2008				Hearsay
DX-0290	White House Fact Sheet, Financing Assistance to Facilitate the Restructuring of Auto Manufacturers to Attain Financial Viability, dated December 19, 2008				Hearsay

DX Number	Exhibit Description	Exhibit Source	Deposition	Deposition Exhibit	Plaintiff's Objections to Exhibit
DX-0291	White House Fact Sheet, Obama Administration Auto Restructuring Initiative for General Motors, dated May 31, 2009				Hearsay
DX-0292	Fitch Ratings, Fitch Ratings Global Corporate Finance 2009 Transition and Default Study (March 18, 2010)				Hearsay; Foundation; Authentication
DX-0293	Email chain, dated June 1, 2009, attaching Summary Term Sheet	Feldman 11/3/16 Dep., Ex. JD-UST-10			No objection
DX-0294	Email chain, dated June 1, 2009, regarding Term Sheet	Feldman 11/3/16 Dep., Ex. JD-UST-11			No objection
DX-0295	AlixPartners presentation regarding The General Motors Story, dated September, 2009	ALIX 0000511			
DX-0296	A.T. Kearny, The Contribution of the Automobile Industry to Technology and Value Creation (2013)				Hearsay; Foundation; Authentication
DX-0297	Center for Automotive Research, Just How High-Tech is the Automotive Industry? (January 2014)				Hearsay; Foundation; Authentication
DX-0298	U.S. Treasury, Interim Final Rule on TARP Standards and Corporate Governance (June 10, 2009)				Hearsay; Relevance; Foundation; Authentication
DX-0299	Center for Automotive Research, Parity, dated May 10, 2010				Hearsay; Foundation; Authentication
DX-0300	Motors Liquidation Company, Monthly Operating Report for the Month Ended September 30, 2009, dated November 19, 2009				Relevance
DX-0301	Motors Liquidation Company GUC Trust: Quarterly GUC Trust Reports as of June 30, 2011, dated August 1, 2011				Hearsay; Relevance; Foundation
DX-0302	UAW General Motors, Modifications to 2007 Agreement and Addendum to VEBA Agreement, dated May 2009				Hearsay; Foundation; Authentication
DX-0303	GM Corporate Newsroom, GM Surpasses Landfill-Free Facilities Commitment, dated December 13, 2010				Hearsay; Foundation; Relevance
DX-0304	Michael J. de la Merced, At G.M., He's in Charge of Selling What Remains, N.Y. Times (June 4, 2009)	Koch 9/15/16 Dep., Ex. JPM-Alix 27			Hearsay; Foundation; Authentication
DX-0305	Tim Higgins, Deadline for New GM under Fire, Detroit Free Press (July 3, 2009)				Hearsay; Foundation
DX-0306	Email chain, dated May 8, 2009, attaching U.S. Term Loan Buy Back Project Presentation	Worth 9/27/16 Dep., Ex. AAT-Worth 7			No objection
DX-0307	Ted H. Chu & Yingzi Su, Will the U.S. Auto Market Come Back? (2010)	Mohatarem 11/15/16 Dep., Ex. JPM-GM 12			Hearsay; Foundation; Authentication
DX-0308	David C. Smith, GM's Top Economist Raises 2015 Forecast 500,000 Units, Wards Auto (Aug. 8, 2015)	Mohatarem 11/15/16 Dep., Ex. JPM-GM 13			Hearsay; Foundation; Authentication
DX-0309	Center for Automotive Research, The Impact on the U.S. Economy of a Major Contraction of the Detroit Three Automakers (November 4, 2008)				Hearsay; Foundation; Authentication
DX-0310	Edward I. Altman and Edith Hotchkiss, Corporate Financial Distress and Bankruptcy (2006) (excerpt)				Hearsay; Incomplete
DX-0311	Edith Hotchkiss, Post-Bankruptcy Performance and Management Turnover, 1 J. Fin. 3 (2007)				Hearsay; Relevance; Foundation
DX-0312	Richard A. Brealey et. al., Principles of Corporate Finance (2014) (excerpt)				Hearsay; Relevance; Foundation; Incomplete
DX-0313	Shannon P. Pratt and Roger J Grabowski, Cost of Capital: Applications and Examples (5th ed. 2014) (excerpt)				Hearsay; Relevance; Foundation; Incomplete
DX-0314	Aswath Damodaran, Equity Risk Premiums (ERP): Determinants, Estimation and Implications (2012)				Hearsay; Relevance; Foundation; Incomplete

DX Number	Exhibit Description	Exhibit Source	Deposition	Deposition Exhibit	Plaintiff's Objections to Exhibit
DX-0315	Jeffery M. Risius and Jesse A Ultz, Mirant Corporation Bankruptcy: A Thorough Review of Valuation by the Bankruptcy Court (2012)				Hearsay; Relevance; Foundation
DX-0316	Avner Kaley et al., Is Chapter 11 Costly? (2007)				Hearsay; Relevance; Foundation
DX-0317	Daniel R. Fischel, The Appraisal Remedy in Corporate Law, 8 ABA Foundation Res. J. 875 (1983)				Hearsay
DX-0318	Edith S. Hotchkiss et al., Bankruptcy and the Resolution of Financial Distress (2008)				Hearsay
DX-0319	David Laro and Shannon P. Pratt, Business Valuation and Federal Taxes (excerpt)	Fischel 1/31/17 Dep., Ex. Fischel 3			No objection
DX-0320	Valuations of the Representative Assets	NEWGM000000949; KPMG-GM0003703; KPMG-GM0004130; NEWGM000000747; Expert Report of Carl Chruppa			Hearsay; Relevance; Foundation
DX-0321	Bureau of Labor Statistics, Productivity and Costs: First Quarter 2009, Preliminary				No objection
DX-0322	Bureau of Labor Statistics, Productivity and Costs: First Quarter 2009, Revised				No objection
DX-0323	Factory Mutual Insurance Company, "Property Loss Prevention Data Sheets: Industrial Cost Trends," dated July 2016				Hearsay, Relevance; Foundation
DX-0324	Zurich, Replacement Value Cost Trends (January 2016)				Hearsay, Relevance; Foundation
DX-0325	Business Valuation Resources, 2Q 2009 - Economic Outlook Update				Hearsay; Foundation
DX-0326	Consensus Economics, Consensus Forecasts Survey (June 2009)				Hearsay; Foundation
DX-0327	ADESA Analytical Services, Pulse: Latest Economic Indicators, 2009 Mid-Year Recap				Hearsay; Foundation; Authentication
DX-0328	U.S. Dept of Treasury, HQM Corporate Bond Yield Curve Spot Rates 2009-2013				No objection
DX-0329	ASA, Valuing Machinery and Equipment: The Fundamentals of Appraising Machinery and Technical Assets (3d ed 2011) (excerpt)	Goesling 2/7/17 Dep., Ex. Goesling 34			No objection
DX-0330	ASA Valuing Machinery and Equipment: The Fundamentals of Appraising Machinery and Technical Assets (3d ed 2011) (excerpt)	Goesling 2/7/17 Dep., Ex. Goesling 34A			No objection
DX-0331	Evidence of GM ownership of land associated with GM Lansing Delta Township Assembly				Documents have not been identified or provided to Plaintiff; Plaintiff reserves all rights to object. Any identification of this exhibit is untimely.
DX-0332	Evidence of GM ownership of land associated with GM Lansing Regional Stamping				Documents have not been identified or provided to Plaintiff; Plaintiff reserves all rights to object. Any identification of this exhibit is untimely.
DX-0333	Evidence of GM ownership of land associated with GM Powertrain Warren Transmission				Documents have not been identified or provided to Plaintiff; Plaintiff reserves all rights to object. Any identification of this exhibit is untimely.

DX Number	Exhibit Description	Exhibit Source	Deposition	Deposition Exhibit	Plaintiff's Objections to Exhibit
DX-0334	Evidence of GM ownership of land associated with GM MFD Grand Rapids				Documents have not been identified or provided to Plaintiff. Plaintiff reserves all rights to object. Any identification of this exhibit is untimely.
DX-0335	Evidence of GM ownership of land associated with GM Powertrain Engineering Pontiac				Documents have not been identified or provided to Plaintiff. Plaintiff reserves all rights to object. Any identification of this exhibit is untimely.
DX-0336	Evidence of GM ownership of land associated with GM Powertrain Defiance				Documents have not been identified or provided to Plaintiff. Plaintiff reserves all rights to object. Any identification of this exhibit is untimely.
DX-0337	Evidence of GM ownership of land associated with GM MFD Mansfield				Documents have not been identified or provided to Plaintiff. Plaintiff reserves all rights to object. Any identification of this exhibit is untimely.
DX-0338	Email chain, dated May 28, 2009, regarding Project 363 05.28.09.xlsx	ALIX 0000096			No objection
DX-0339	Project 363 Change Control Log (excerpt; Change Control – In Process, MFG and Non MFG – Owned tabs)	ALIX 0000098			No objection
DX-0340	2016-2017 Uniform Standards of Professional Appraisal Practice (excerpt; pp. 50-52)	Goesling 2/7/17 Dep., Ex. Goesling 44			Incomplete
DX-0341	2016-2017 Uniform Standards of Professional Appraisal Practice (excerpt; pp. 14-15)	Goesling 2/7/17 Dep., Ex. Goesling 45			Incomplete

Picture & Video Exhibits

DX Number	Exhibit Description	Exhibit Source	Plaintiff's Objections to Exhibit
DX-1001	Video of Power Zone Roller Conveyor similar to Asset 3, Power Zone Roller Conveyor Automation TCH MOD 3	BRG-100033473-0006	Relevance
DX-1002	Video of Asset 4, Paint Bldg Lines - Process Waste ELPO (no audio)	BRG-1000378921-0006	Hearsay (audio)
DX-1003	Picture of Asset 12, BS Robot LAZN-150R1 & Asset 16, BS Skid Conveyor - Laza	BRG-1000610791-0032	Relevance
DX-1004	Picture of Asset 14, Leak Test Base Machine		Foundation; Authentication
DX-1005	Video of Grob Leak Tester similar to Asset 14, Leak Test Base Machine	BRG-100053706-0002	Relevance
DX-1006	Picture of Asset 19, BS CMM Full Body Machine - LY90		Foundation; Authentication; Hearsay; Relevance
DX-1007	Picture of CMM Machine, similar to Asset 19, BS CMM Full Body Machine - LY90		Foundation; Authentication; Relevance
DX-1008	Video of Robotic material handling system for ring green phase II similar to Asset 22, FANUC M-710IB/70T Robot Assembly	BRG-100051865-0056	Relevance; Hearsay (audio)
DX-1009	Video of Robotic material handling system for ring green phase II similar to Asset 22, FANUC M-710IB/70T Robot - Assembly	BRG-100051865-0057	Relevance
DX-1010	Picture of Asset 26, Core Delivery Conveyor System CBI16 & 122	BRG-100041524-0018	Relevance
DX-1011	Picture of Furnace, similar to Asset 28, 100 Ton Vertical Channel Holding Furnace		Foundation; Authentication; Relevance
DX-1012	Picture of Furnace, similar to Asset 28, 100 Ton Vertical Channel Holding Furnace		Foundation; Authentication; Relevance
DX-1013	Picture of Furnace, similar to Asset 28, 100 Ton Vertical Channel Holding Furnace		Foundation; Authentication; Relevance; Hearsay
DX-1014	Picture of Asset 29, Transfer Press-GG-1 & Asset 30, TP-14 CS1-1 Transfer Press Danly ET-2	BRG-NIT217016 (No longer on-site)-0034	Relevance; Misleading description - picture taken at different facility than where Assets 29 and 30 were located
DX-1015	Picture of Press Pit, similar to Asset 29, Transfer Press-GG-1 & Asset 30, TP-14 CS1-1 Transfer Press Danly ET-2		Foundation; Authentication; Relevance
DX-1016	Picture of Danly Transfer Press, similar to Asset 30, TP-14 CS1-1 Transfer Press Danly ET-2		Foundation; Authentication
DX-1017	Images over Time of 10301 W. Warren Ave. Dearborn, MI	Google Maps Street View	Untimely (not produced in discovery); Authentication; Foundation;
DX-1018	Pictures of 10301 W. Warren Ave. Dearborn, MI as of 2017	Dan Deeds Photographs	Hearsay; Relevance
			Untimely (not produced in discovery); Authentication; Foundation; Hearsay; Relevance
DX-1019	Picture of #4 cupola 7 1/2 ton P & H charge crane showing Charge Yard of Defiance	BRG-NJL2993200-0052	Relevance
DX-1020	Picture of 90 degree shaker showing Knockout / Shakeout / Sand Reclaim of Defiance	BRG-100122909-0027	Relevance
DX-1021	Picture of Ajax 90 ton horizontal holding furnace showing Melting Area of Defiance	BRG-NJL29339011-0026	Relevance
DX-1022	Picture of CB 116 core machine showing Core Room of Defiance	BRG-NJL3026100-0036	Relevance
DX-1023	Picture of CB 120 showing Core Room of Defiance	BRG-1000049201 & 211-0018	Relevance
DX-1024	Picture of CB 120 showing Core Room of Defiance	BRG-1000049201 & 211-0162	Relevance
DX-1025	Picture of Core Sand System at Defiance Foundry	BRG-NJL2960502-0096	Relevance
DX-1026	Picture of Defiance Foundry		Foundation; Authentication; Relevance
DX-1027	Picture of Drag flask punch out showing Knockout / Shakeout / Sand Reclaim of Defiance	BRG-NJL28727001-0063	Relevance
DX-1028	Picture of Drag flask punch out showing Knockout / Shakeout / Sand Reclaim of Defiance	BRG-NJL28727001-0082	Relevance
DX-1029	Picture of Dust Collectors at Defiance	BRG-100092760-0017	Relevance
DX-1030	Picture of Dust Collectors at Defiance	BRG-100092760-0037	Relevance
DX-1031	Picture of Fan hot blast line 6 west cupola showing Mold Line 6 Melting of Defiance	BRG-NJL6068302-0060	Relevance
DX-1032	Picture of FN 4 conveyor showing Finishing Area of Defiance	BRG-100043353-0009	Relevance
DX-1033	Picture of Gate / sprue sand oscillator showing Knockout / Shakeout / Sand Reclaim of Defiance	BRG-1000891681-0004	Relevance
DX-1034	Picture of ML 1 conveyor drive showing Mold Lines 1, 2 & 3 of Defiance	BRG-NJL2934400-0007	Relevance
DX-1035	Picture of ML 1 conveyor drive showing Mold Lines 1, 2 & 3 of Defiance	BRG-NJL2934400-0012	Relevance
DX-1036	Picture of ML 1 conveyor drive showing Mold Lines 1, 2 & 3 of Defiance	BRG-NJL2934400-0093	Relevance

DX-1037	Picture of ML 6 mold machine showing Mold Line 6 of Defiance	BRG-NJL6047075-0028	Relevance
DX-1038	Picture of ML 6 mold machine showing Mold Line 6 of Defiance	BRG-NJL6047075-0036	Relevance
DX-1039	Picture of ML 6 mold machine showing Mold Line 6 of Defiance	BRG-NJL6047075-0043	Relevance
DX-1040	Picture of ML 6 mold machine showing Mold Line 6 of Defiance	BRG-NJL6047075-0068	Relevance
DX-1041	Picture of ML 6 mold machine showing Mold Line 6 of Defiance	BRG-NJL6047075-0087	Relevance
DX-1042	Picture of ML 6 surge sand bin showing Shakeout of Defiance	BRG-NJL6092200-0016	Relevance
DX-1043	Picture of ML 7 melting trim deck / charging system showing Charge Yard of Defiance	BRG-100099143-0003	Relevance
DX-1044	Picture of ML 7 melting trim deck / charging system showing Charge Yard of Defiance	BRG-100099143-0066	Relevance
DX-1045	Picture of Molding machine spomatic showing Mold Line 6 of Defiance	BRG-NJL2934600-0053	Relevance
DX-1046	Picture of Pangborn shot blast showing Finishing Area of Defiance	BRG-100044908-0003	Relevance
DX-1047	Picture of Pangborn shot blast showing Finishing Area of Defiance	BRG-100044908-0004	Relevance
DX-1048	Picture of Pangborn shot blast showing Finishing Area of Defiance	BRG-100044908-0009	Relevance
DX-1049	Picture of Pangborn shot blast showing Finishing Area of Defiance	BRG-100044908-0022	Relevance
DX-1050	Picture of RCO unit cell 1 at Defiance	BRG-NJL7149400-0010	Relevance
DX-1051	Picture of safety fence around Verson press pit	BRG-NIT217016 (No longer on-site)-0048	Relevance
DX-1052	Picture of Side core dip system showing Core Room of Defiance	BRG-NJLC01110-0080	Relevance
DX-1053	Picture of Slag conveyor showing Melting Area of Defiance	BRG-100098086-0020	Relevance
DX-1054	Picture of System casting shake out showing Shakeout of Defiance	BRG-NJL2959701-0018	Relevance
DX-1055	Picture of System skip charger showing Charge Yard of Defiance	BRG-NJL29244031-0092	Relevance
DX-1056	Picture of Tooling change car CB 106 showing Core Room of Defiance	BRG-NJL2996700-0043	Relevance
DX-1057	Picture of Tooling change car CB 106 showing Core Room of Defiance	BRG-NJL2996700-0049	Relevance
DX-1058	Picture of Verson press pit	BRG-NIT217016 (No longer on-site)-0039	Relevance
DX-1059	Picture of Waste water brine treatment showing Waste Water Treatment Facility of Defiance	BRG-2AAFE0004082-0048	Relevance
DX-1060	Picture Showing Melting Area of Defiance	BRG-NJL6085800-0034	Relevance
DX-1061	Picture of Pontiac Facilities	Mike Regiec	Authentication; Foundation; Relevance
DX-1062	Picture of Pontiac Facilities from Above		Authentication; Foundation; Relevance
DX-1063	Picture of Pontiac Utilities Trestle	Apple Maps Flyover	Authentication; Foundation; Relevance
DX-1064	Picture of Air Houses, similar to components of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-NIT218271-0011	Objection : relevance
DX-1065	Picture of Air Houses, similar to components of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-NIT218271-0014	Objection: relevance
DX-1066	Picture of Air Houses, similar to components of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-NIT218271-0023	Objection: relevance
DX-1067	Picture of Air Houses, similar to components of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-NIT218271-0038	Objection: relevance
DX-1068	Picture of Air Houses, similar to components of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-NIT218271-0039	Objection: relevance
DX-1069	Picture of Air Houses, similar to components of Asset 11, Lansing Delta Township Assembly Utility Services	BRG-NIT218271-0040	Objection: relevance
DX-1070	Video of Asset 25, Liebherr Hobb Machine	BRG-100071021-0002	Objections: relevance; finger pointing
DX-1071	Picture of Asset 29, Transfer Press-GG-1 & Asset 30, TP-14 CSI-1 Transfer Press Danly ET-2	BRG-NIT217016 (No Longer on-site)-0002	Objection: misleading description - picture taken at different facility than where Assets 29 and 30 were located; relevance
DX-1072	Picture of Asset 29, Transfer Press-GG-1 & Asset 30, TP-14 CSI-1 Transfer Press Danly ET-2	BRG-NIT217016 (No Longer on-site)-0016	Objection: misleading description - picture taken at different facility than where Assets 29 and 30 were located; relevance
DX-1073	Picture of Asset 29, Transfer Press-GG-1 & Asset 30, TP-14 CSI-1 Transfer Press Danly ET-2	BRG-NIT217016 (No Longer on-site)-0004	Objection: misleading description - picture taken at different facility than where Assets 29 and 30 were located; relevance

DX-1074	Picture of Asset 29, Transfer Press-GG-1 & Asset 30, TP-14 CS1-1 Transfer Press Danly ET-2	BRG-NIT217016 (No Longer on-site)-0005	Objection: misleading description - picture taken at different facility than where Assets 29 and 30 were located; relevance
DX-1075	Picture of Asset 29, Transfer Press-GG-1 & Asset 30, TP-14 CS1-1 Transfer Press Danly ET-2	BRG-NIT217016 (No Longer on-site)-0011	Objection: misleading description - picture taken at different facility than where Assets 29 and 30 were located; relevance
DX-1076	Picture of Asset 29, Transfer Press-GG-1 & Asset 30, TP-14 CS1-1 Transfer Press Danly ET-2	BRG-NIT217016 (No Longer on-site)-0014	Objection: misleading description - picture taken at different facility than where Assets 29 and 30 were located; relevance
DX-1077	Picture of Asset 29, Transfer Press-GG-1 & Asset 30, TP-14 CS1-1 Transfer Press Danly ET-2	BRG-NIT217016 (No Longer on-site)-0049	Objection: misleading description - picture taken at different facility than where Assets 29 and 30 were located; relevance

Exhibit D

Exhibit D - Plaintiff's Exhibit List

P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0001	WEILJPMGM00874428	Email chain dated October 7, 2006 regarding Term Loan agreement term sheet	Burshtine Dep Ex AAT-Burshtine_001	Relevance
PX0002	WEILJPMGM00870849	Email chain dated November 18, 2006 regarding sale-leaseback issue and Section 6.02(b)(xi)	Burshtine Dep Ex AAT-Burshtine_002	Relevance
PX0003	WEILJPMGM00868168	Email chain dated November 15, 2006 regarding lien searches for Term Loan	Burshtine Dep Ex AAT-Burshtine_003	Relevance
PX0004	WEILJPMGM00867899	Email dated November 23, 2006 regarding lien searches for Term Loan and problematic liens	Burshtine Dep Ex AAT-Burshtine_004	Relevance
PX0005	JPMCB-5-00025743	Email chain dated November 27, 2006 regarding revised Term Loan collateral documents	Burshtine Dep Ex JPM-Weil 006	Relevance
PX0006	Chrappa Dep Ex AAT-Chrappa 003	Choice Presses Inc. sale notice for used ABB IRB 6400 Robots with S4 Controller		Hearsay
PX0007	Chrappa Dep Ex AAT-Chrappa 004	Choice Presses Inc. sale notice for various presses		Hearsay
PX0008	Chrappa Dep Ex AAT-Chrappa 005	Asset-auctions.com listing for various presses		Hearsay
PX0009	Chrappa Dep Ex AAT-Chrappa 006	Bidspotter.com spreadsheet listing current inventory for Maynards Industries auction from GM Pittsburgh MFD		Hearsay
PX0010	Chrappa Dep Ex AAT-Chrappa 007	Hilco Industrial, LLC auction notice for FANUC R2000IA 165F Series Robots		Hearsay
PX0011	Chrappa Dep Ex AAT-Chrappa 008	Hilco Industrial, LLC auction notice for ABB Model IRB6400S Robot (2004)		Hearsay
PX0012	Chrappa Dep Ex AAT-Chrappa 009	Bidspotter.com Maynards Industries Auction Results for GM Pontiac MFD		Hearsay
PX0013	Chrappa Dep Ex AAT-Chrappa 010	Bidspotter.com Maynards Industries Auction Results for GM Online Auction		Hearsay
PX0014	Chrappa Dep Ex AAT-Chrappa 011	Bidspotter.com Maynards Industries Auction Results for GM Doraville Assembly on 8/29/2008		Hearsay
PX0015	Chrappa Dep Ex AAT-Chrappa 012	Bidspotter.com Maynards Industries Auction Results for GM Surplus Assets on November 26th, 2008		Hearsay
PX0016	Chrappa Dep Ex AAT-Chrappa 013	Bidspotter.com Maynards Industries Auction Results for GM Pontiac MFD Surplus Assets on 11/6/2008		Hearsay
PX0017	Chrappa Dep Ex AAT-Chrappa 014	Amended and Restated Master Purchase and Sale Agreement (Bankr. Dkt. No. 2968-2)		
PX0018	HILCO_00002943	Hilco Fair Market Value Analysis of Leased GM 2001 Powertrain Assembly Lines	Dahlman Dep Ex AAT-HV002	Relevance
PX0019	HILCO_00003800	Hilco proposal regarding valuation of GM Stamping & Powertrain Leases	Dahlman Dep Ex JPM-HV001	Relevance
PX0020	David Goesling	GM Retirement Analysis (native)		Relevance; Hearsay; Foundation; Incomplete

Exhibit D - Plaintiff's Exhibit List

P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0021	David Goesling	Auction Data (native)		Relevance; Hearsay; Foundation; Incomplete
PX0022	David Goesling	GM Asset Transfer Analysis supplement (2-6-17) (native)		Relevance; Hearsay; Foundation; Incomplete
PX0023	GM0000000001	Collection of Term Loan Collateral Value Certificates	Duker Dep Ex AAT-Duker 003	Relevance
PX0024	JPMCB-3-00019731	JPMorgan Chase Bank, N.A. Risk Policy for Collateral	Duker Dep Ex AAT-Duker 004	Relevance
PX0025	JPMCB-5-00007875	Email dated January 24, 2007 attaching pitch materials relating to Term Loan Agreement	Duker Dep Ex AAT-Duker 005	Relevance; Incomplete
PX0026	JPMCB-5-00054849	Email dated October 11, 2006 regarding Term Loan proposal	Duker Dep Ex AAT-Duker 006	Relevance
PX0027	JPMCB-2-00013148	Email dated December 18, 2008 forwarding public and private Term Loan Information Memoranda	Duker Dep Ex AAT-Duker 007	Relevance
PX0028	JPMCB-5-00005975	Email dated November 15, 2006 regarding Term Loan fixture proposal	Duker Dep Ex AAT-Duker 008	Relevance
PX0029	JPMCB-5-00066465	Email dated November 21, 2006 regarding collateral for Term Loan	Duker Dep Ex AAT-Duker 009	Relevance
PX0030	JPMCB-5-00071884	Email chain dated November 22, 2006 regarding non-manufacturing carve out for Term Loan collateral	Duker Dep Ex AAT-Duker 010	Relevance
PX0031	JPMCB-5-00067109	Email chain dated November 24, 2006 regarding revised Collateral Agreement	Duker Dep Ex AAT-Duker 011	Relevance
PX0032	JPMCB-3-00003909	Email chain dated October 10, 2008 regarding Term Lender question about Collateral Value	Duker Dep Ex AAT-Duker 012	Relevance
PX0033	JPMCB-2-00025247	Email chain dated October 15, 2008 regarding Term Lender question about Collateral Value	Duker Dep Ex AAT-Duker 013	Relevance
PX0034	JPMCB-5-00015067	Email chain dated October 16, 2008 regarding Term Lender question about Collateral coverage and value	Duker Dep Ex AAT-Duker 014	Relevance
PX0035	JPMCB-2-00027092	Email chain dated February 14, 2009 regarding amendment to Term Loan	Duker Dep Ex AAT-Duker 015	Relevance
PX0036	JPMCB-2-00031062	Email chain dated February 27, 2009 regarding potential resignation of JPMorgan Chase Bank, N.A. as Term Loan Agent	Duker Dep Ex AAT-Duker 016	Relevance
PX0037	JPMCB-2-0005274	Email chain dated May 21, 2009 regarding potential payoff of Term Loan	Duker Dep Ex AAT-Duker 018	Relevance
PX0038	JPMCB-2-00030764	Email chain dated April 21, 2009 regarding Term Loan SNC submission	Duker Dep Ex AAT-Duker 021	Relevance

Exhibit D - Plaintiff's Exhibit List

P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0039	Eaton County Register of Deeds	2003 C-1 Continuation of Fixture Filing		Relevance; Hearsay; Foundation
PX0040	Eaton County Register of Deeds	Delta Township Utilities II Continuation of Fixture Filing		Relevance; Hearsay; Foundation
PX0041	Eaton County Register of Deeds	Delta Township Utilities II Fixture Filing		Relevance; Hearsay; Foundation
PX0042	NEWGM0000020677	2009 Personal Property Statement for GM Powertrain Warren Transmission	Fulcher Dep Ex AT-GM_003	Relevance; Incomplete
PX0043	NEWGM0000020689	2009 Personal Property Statement for GM Powertrain Warren Transmission	Fulcher Dep Ex AT-GM_005	Relevance; Incomplete
PX0044	NEWGM0000007883	Michigan Personal Property Tax detail 2009 (Warren excerpt)	Fulcher Dep Ex AT-GM_006	Relevance
PX0045	NEWGM0000007883	Michigan Personal Property Tax detail 2009 (Lansing Lansing Delta Township excerpt)	Fulcher Dep Ex AT-GM_007	Relevance
PX0046	NEWGM0000020473	2009 Personal Property Statement for Lansing Delta Township Assembly parcel no. 90-23-50-13-301-000	Fulcher Dep Ex AT-GM_008	Relevance; Incomplete
PX0047	NEWGM0000020479	2009 Personal Property Statement for Lansing Delta Township Assembly parcel no. 90-23-50-85-105-000	Fulcher Dep Ex AT-GM_009	Relevance; Incomplete
PX0048	NEWGM0000035849	Automotive Manufacturing Equipment Personal Property Report for GM Powertrain Warren Transmission parcel no. GM LLC NEW FILING 02 - IFT 2004-067	Fulcher Dep Ex AT-GM_010	Relevance; Incomplete
PX0049	NEWGM0000035851	2010 Personal Property Statement for GM Powertrain Warren Transmission parcel no. GM LLC NEW FILING 02 - IFT 2004-067	Fulcher Dep Ex AT-GM_011	Relevance; Incomplete
PX0050	NEWGM0000035857	Automotive Manufacturing Equipment Personal Property Report for GM Powertrain Warren Transmission parcel no. GM LLC NEW FILING 03 - IFT 2006-171	Fulcher Dep Ex AT-GM_012	Relevance; Incomplete
PX0051	NEWGM0000035859	2010 Personal Property Statement for GM Powertrain Warren Transmission parcel no. GM LLC NEW FILING 03 - IFT 2006-171	Fulcher Dep Ex AT-GM_013	Relevance; Incomplete
PX0052	NEWGM0000035865	2010 Personal Property Statement for GM Powertrain Warren Transmission parcel no. GM LLC NEW FILING 01	Fulcher Dep Ex AT-GM_014	Relevance; Incomplete
PX0053	NEWGM0000035871	Automotive Manufacturing Equipment Personal Property Report for GM Powertrain Warren Transmission parcel no. GM LLC NEW FILING 01	Fulcher Dep Ex AT-GM_015	Relevance; Incomplete
PX0054	NEWGM0000035604	2010 Personal Property Statement for Lansing Delta Township Assembly parcel no. GM LLC NEW FILING 10	Fulcher Dep Ex AT-GM_016	Relevance; Incomplete
PX0055	NEWGM0000035610	Automotive Manufacturing Equipment Personal Property Report listing values for equipment at Lansing Delta Township Assembly parcel no. GM LLC NEW FILING 8	Fulcher Dep Ex AT-GM_017	Relevance; Incomplete

Exhibit D - Plaintiff's Exhibit List

P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0056	NEWGM000035612	2010 Personal Property Statement for Lansing Delta Township Assembly parcel no. GM LLC NEW FILING 8	Fulcher Dep Ex AT-GM_018	Relevance; Incomplete
PX0057	NEWGM000020683	2009 Personal Property Statement for GM Powertrain Warren Transmission parcel no. 98-82-006-171	Fulcher Dep Ex AT-GM_04	Relevance; Incomplete
PX0058	Goesling Dep Ex Goesling 021	Yoplait USA v. City of Reed City, Mich. Tax Tribunal, November 20, 2015		Relevance; Hearsay; Foundation
PX0059	Koch Dep Ex AAT-Koch 001	Declaration of Albert Koch (Bankr. Dkt. No. 435)		Relevance; Hearsay
PX0060	Alix0000297	Alix Partners presentation regarding bankruptcy and implications	Koch Dep Ex AAT-Koch 006	Relevance
PX0061	Koch Dep Ex JPM-Alix_002	Second Supplemental Declaration of Albert A. Koch of AP Services, LLC as Crisis Managers and Chief Restructuring Officer to the Debtors and Debtors in Possession (Bankr. Dkt. No. 3133)		Relevance; Hearsay; Foundation
PX0062	HILCO_000000989	Sales Strategy Presentation by Hilco and Maynards Industries for Pontiac Assembly, Pittsburgh Stamping, Moraine Assembly, Massena Powertrain, Grand Rapids Stamping, and Livonia Powertrain	Levy Dep Ex AAT-HCO_002	Relevance
PX0063	HILCO_00036509	Hilco Industrial, LLC and Maynards Industries Auction notice for auction at PCC West on 5/25/2010	Levy Dep Ex AAT-HCO_003	Relevance
PX0064	HILCO_000000098	Hilco Industrial, LLC and Maynards Industries Auction notice for auction at Ypsilanti on 8/3/2010	Levy Dep Ex AAT-HCO_004	Relevance
PX0065	HILCO_00036283	Hilco Industrial, LLC and Maynards Industries Auction notice for auction at Pontiac, MI on 10/5/2010	Levy Dep Ex AAT-HCO_005	Relevance
PX0066	HILCO_00036275	Hilco Industrial, LLC and Maynards Industries Auction notice for auction at Livonia, MI on 10/14/2010	Levy Dep Ex AAT-HCO_006	Relevance
PX0067	HILCO_00033217	Hilco Industrial, LLC and Maynards Industries Auction notice for auction at Pontiac on 11/4/2010	Levy Dep Ex AAT-HCO_007	Relevance
PX0068	HILCO_00036659	Hilco Industrial, LLC and Maynards Industries Auction notice for auction at Grand Rapids on 11/10-11/11/2010	Levy Dep Ex AAT-HCO_008	Relevance
PX0069	HILCO_00036464	Hilco Industrial, LLC and Maynards Industries Auction notice for auction at Grand Blanc, MI on 1/18/2011	Levy Dep Ex AAT-HCO_009	Relevance
PX0070	HILCO_000003761	Presentation on Stamping Presses / Engine Lines at GM by Harbour Consulting	Levy Dep Ex AAT-HCO_013	Hearsay; Authentication; Foundation; Relevance
PX0071	HILCO_00034534	Email chain dated March 23, 2010 regarding offer to purchase certain equipment from Masena Power Train plant	Levy Dep Ex AAT-HCO_014	Relevance
PX0072	HILCO_00033651	Bill of Sale and Agreement for RACER Trust (Representative Asset No. 30)	Levy Dep Ex AAT-HCO_016	Relevance

Exhibit D - Plaintiff's Exhibit List

P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0073	MAYNARDS007486	Email dated June 8, 2011 regarding amendments to Asset Marketing Agreement	Levy Dep Ex AAT-HCO_017	Relevance
PX0074	HILCO_00035078	Hilco Industrial, LLC and Maynards Industries Auction notice for auction at Mansfield on 10/19-10/20/2011	Levy Dep Ex AAT-HCO_018	Relevance
PX0075	HILCO_00033050	Hilco Industrial, LLC and Maynards Industries Auction notice for auction at Indianapolis on 4/26/2011	Levy Dep Ex AAT-HCO_019	Relevance
PX0076	HILCO_00035309	Hilco Industrial, LLC and Maynards Industries Auction notice for auction at Ypsilanti, MI on 5/17-5/20/2011	Levy Dep Ex AAT-HCO_020	Relevance
PX0077	HILCO_00001125	Scope of Work to GM Global Asset Recovery for auction services	Levy Dep Ex AAT-HCO_021	Relevance
PX0078	HILCO_00004821	Spreadsheet listing certain assets and their auction value	Levy Dep Ex AAT-HCO_023	Relevance
PX0079	Levy Dep Ex JPM-HCO 001	Notice of Presentment of Order Authorizing Retention of Hilco Industrial, LLC and Maynards Industries (Bankr. Dkt. No. 4984)		Relevance
PX0080	MAYNARDS008591	Schematic of Willow Run plant	Levy Dep Ex JPM-HCO 024	
PX0081	Motors-MIM-000001	List of certain presses with location and type	Miller Dep Ex AAT-Miller 002	Relevance; Hearsay; Authentication; Foundation
PX0082	Miller Dep Ex AAT-Miller 009	Website and photos regarding GM Press Relocation from Grand Rapids, MI and Mansfield OH		Hearsay; Authentication; Foundation
PX0083	NEWGM000041290	Executed Lease Supplement between US Bank Trust National Association and General Motors Corporation	Miller Dep Ex AAT-Miller 022	Relevance
PX0084	RM0001	Series of e-mail chains and attachments regarding property in Lansing, MI	Mollhagen Dep Ex mollhagen 002	Hearsay; Relevance
PX0085	KPMG-GM0003981	GM Accounting Policy - Section 33 - Accumulated Depreciation and Amortization	Niszcak Dep Ex AT-GM 020	
PX0086	Niszcak Dep Ex AT-GM_021	Spreadsheet listing values and other information on assets		Hearsay; Foundation
PX0087	Pniewski Dep Ex AAT-Pniewski 002	FSA Log of Valuation Issues and Questions		Hearsay; Foundation
PX0088	EVR-E-000164559	Email dated February 17, 2009 attaching Final GM Restructuring Plan	Pniewski Dep Ex AAT-Pniewski 003	
PX0089	EVR-E-000096685	GM Liquidity Plan dated August 26, 2008	Pniewski Dep Ex AAT-Pniewski 005	
PX0090	DT 0007309	Budget/Business Plan 2010-2011 for December 2009 Board of Directors Meeting	Pniewski Dep Ex AAT-Pniewski 006	

Exhibit D - Plaintiff's Exhibit List

P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0091	HILCO_00001201	Letter to Crowell & Moring LLP dated June 7, 2011 enclosing Hilco Industrial, LLC and Maynards Industries 2009 proposal to RACER Trust	Sofikitis Dep Ex AAT-MND 002	Relevance
PX0092	HILCO_00036689	E-mail dated October 8, 2010 attaching brochure for the Motors Liquidation Corporation Grand Rapids auction	Sofikitis Dep Ex AAT-MND 003	Relevance
PX0093	MAYNARDS000918	Maynard Sales Report for auction at Grand Rapids on 11/10-11/11/2010	Sofikitis Dep Ex AAT-MND 004; Levy Dep Ex AAT-HCO_010	Relevance
PX0094	MAYNARDS000795	Asset list for sale for auction at Motors Liquidation Corporation - Grand Rapids held on 11/10/2010	Sofikitis Dep Ex AAT-MND 005	Relevance
PX0095	MAYNARDS000012	Asset Marketing Agreement between Hilco Industrial, LLC, Maynards Industries, and RACER Trust	Levy Dep Ex AAT-HCO_015; Sofikitis Dep Ex AAT-MND 006	Relevance
PX0096	MAYNARDS007510	Bill of Sale and Agreement between RACER and Flex-N-Gate Mexico	Sofikitis Dep Ex AAT-MND 007	Relevance
PX0097	MAYNARDS006436	Email dated October 21, 2011 regarding preliminary sales report from 2011 auction at Mansfield	Sofikitis Dep Ex AAT-MND 008	Relevance
PX0098	MAYNARDS006752	Email dated May 26, 2011 discussing an offer for two presses at Mansfield	Sofikitis Dep Ex AAT-MND 009	Relevance
PX0099	MAYNARDS004079	Sales at an auction at Mansfield on 10/19-10/20/2011	Sofikitis Dep Ex AAT-MND 010	Relevance
PX0100	MAYNARDS003170	Motors Liquidation Corporation Monthly Sales Summary - Auctions and Liquidations	Sofikitis Dep Ex AAT-MND 011	Relevance
PX0101	MAYNARDS007946	Email dated May 23, 2011 regarding preliminary report regarding Willow Run / YTO held on 5/17/2011	Sofikitis Dep Ex AAT-MND 012	Relevance
PX0102	MAYNARDS001863	List of assets to be sold at auction at Pontiac Stamping Plants 15 and 25 held on 10/5/2010	Sofikitis Dep Ex AAT-MND 013	Relevance
PX0103	MAYNARDS001952	List of assets to be sold at auction at Willow Run Transmission held on 8/3/2010	Sofikitis Dep Ex AAT-MND 014	Relevance
PX0104	MAYNARDS001028	Final auction report for Livonia plant	Sofikitis Dep Ex AAT-MND 015	Relevance
PX0105	MAYNARDS001297	Sales for auction at Pontiac Assembly held on 11/4/2010	Sofikitis Dep Ex AAT-MND 016	Relevance
PX0106	MAYNARDS002267	Compilation of spreadsheets with Monthly Sales Summary - Auctions and Liquidations	Sofikitis Dep Ex AAT-MND 017	Relevance
PX0107	MAYNARDS002270	Sales at Indianapolis Metal Stamping for auction held on 4/25/2012	Sofikitis Dep Ex AAT-MND 018	Relevance
PX0108	Sofikitis Dep Ex AAT-MND 019	Auction details for assets at various plants		Relevance; Hearsay

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P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0109	MAYNARDS010071	Appraisal of GM Spring Hill Manufacturing and Powertrain, effective date 6/2/2011	Sofikitis Dep Ex AAT-MND 020	Relevance
PX0110	MAYNARDS004357	Hilco Industrial, LLC and Maynards Industries Auction notice for auction at Ypsilanti held on 12/2/2010	Sofikitis Dep Ex AAT-MND 022	Relevance
PX0111	MAYNARDS004044	Brochure for the auction of RACER Trust assets by Maynards Industries and Hilco Industrial, LLC held on 4/26/2012	Sofikitis Dep Ex AAT-MND 023	Relevance
PX0112	MAYNARDS002037	Maynards Industries invoice for a sale of assets to New GM from the Willow Run plant, dated 4/4/2010	Sofikitis Dep Ex JPM-MND 009	Relevance
PX0113	MAYNARDS006884	Letter dated 8/15/2011 re Fredericksburg Facility Personal Property Sale	Sofikitis Dep Ex JPM-MND 043	Relevance
PX0114	Vandermark Dep Ex AAT-Vandermark 02	State Tax Commission (Michigan) Guide to Basic Assessing		Hearsay; Authentication; Foundation
PX0115	EVR-E000084375	Evercore Task List for GM 363 Process	Worth Dep Ex AAT-Worth 003	
PX0116	EVR-E-000463488	Email thread re DIP materials	Worth Dep Ex AAT-Worth 009	
PX0117	MAYNARDS004922	Maynards Industries Invoice dated 6/17/2011 to Diamond Press Solutions for various equipment from the Mansfield facility		Relevance
PX0118	MAYNARDS004949	Maynards Industries Invoice dated 11/3/2011 to International Equipment for various equipment from the Indianapolis facility		Relevance
PX0119	MAYNARDS004969	Maynards Industries Invoice to International Machinery for various equipment from the Indianapolis facility		Relevance
PX0120	MAYNARDS007947	Maynards Industries spreadsheet detailing sales for auction AAKOG100586 at GM Powertrain Willow Run held on 5/17/2011 (native)		Relevance
PX0121	DUFF00000118	Duff & Phelps Fair Value Appraisal Report, dated 2/27/15		Relevance
PX0122	NEWGM000126913	Fixture Filing for 2003 C-1 lease		
PX0123	DUFF000000035	Duff & Phelps Fair Value Appraisal Report, dated 7/9/12		Relevance
PX0124	DUFF000000087	Duff & Phelps Fair Value Appraisal Report, dated 12/2/2013		Relevance
PX0125	DF00000070	Motion of Debtors for Entry of Order Pursuant to 11 USC 105, 363 and 364 (Bankr. Dkt. No. 92)		Hearsay
PX0126	DF00000125	General Motors Company Form 8-K (July 10, 2009)		Relevance; Hearsay; Foundation
PX0127	DF0001146	Government Accountability Office, Troubled Asset Relief Program, Status of Treasury's Investments in General Motors and Ally Financial		Relevance; Hearsay

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P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0128	DF0001208	Department of the Treasury, Secretary Paulson Statement on Stabilizing the Automotive Industry		Relevance; Hearsay
PX0129	DF0002655	Order Pursuant to 11 USC 105, 363, and 365 Approving Procedures for Sale of Debtor's Assets (Bankr. Dkt. No. 274)		Relevance
PX0130	DF0002701	TARP Transaction Report Automotive Industry Financing Program for period ending September 30, 2009		Relevance; Foundation
PX0131	DF0002749	Committee on Banking, Housing, and Urban Affairs United States Senate, Examining the State of the Domestic Automobile Industry		Relevance; Hearsay
PX0132	DF0002960	Troubled Asset Relief Program, Four Year Retrospective Report, an Update on the Wind-Down of TARP		Relevance; Hearsay
PX0133	DF0003012	Declaration of William C. Repko in Support of Proposed Debtor in Possession Financing Facility (Bankr. Dkt. No. 68)		Relevance; Hearsay; Authentication; Foundation
PX0134	DF0003063	US Department of the Treasury, Statement from Treasury Secretary Geithner on the Presidential Task Force on the Auto Industry		Hearsay; Authentication; Foundation
PX0135	DF0003064	The Opinion of the College on Defining Standards of Value, vol. 34, no. 2		Hearsay; Authentication; Foundation
PX0136	DF0003079	Moody's Investor Service, Ratings Symbols and Definitions		Relevance; Hearsay; Authentication; Foundation
PX0137	DF0003127	Statement of the United States of America Upon the Commencement of General Motors Corporation's Chapter 11 Case (Bankr. Dkt. No. 37)		Hearsay
PX0138	DF0003141	The White House, President Bush Discusses Administration's Plan to Assist Automakers		Hearsay
PX0139	DF0003143	International Valuation Standards Council, International Valuations Standards 104, Bases of Value Exposure Draft		Relevance; Hearsay; Authentication; Foundation
PX0140	DF0003215	Fitch Ratings, Definitions of Ratings and Other Forms of Opinion		Relevance; Hearsay; Authentication; Foundation
PX0141	DF0003274	US Department of the Treasury, TARP Programs, Auto Industry Program Overview		
PX0142	DF0003276	US Government Accountability Office, Treasury's Exit from GM and Chrysler Highlights Competing Goals, and Results of Support to Auto Communities Are Unclear		

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P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0143	DF0003474	Motors Liquidation Company Form 8-K (July 8, 2009)		
PX0144	DF0003479	Executive Office of the President, A Look Back at GM, Chrysler and the American Auto Industry		Hearsay; Authentication; Foundation
PX0145	DF0003485	International Valuation Standards 2013, Framework and Requirements		Relevance; Hearsay; Authentication; Foundation
PX0146	DF0003532	S&P, General Motors Corp.'s Recovery Rating Profile		Relevance; Hearsay; Authentication; Foundation
PX0147	DF0003577	Declaration of Harry Wilson (Bankr. Dkt. No. 2577)		
PX0148	DF0003745	S&P Global Ratings Definitions		Relevance; Hearsay; Authentication; Foundation
PX0149	DF0003747	Order Authorizing Sale of Assets Pursuant to Amended and Restated Master Sale and Purchase Agreement (Bankr. Dkt. No. 2968)		Hearsay; Authentication; Foundation
PX0150	DF0003939	Debtors' Second Amended Joint Chapter 11 Plan (Bankr. Dkt. No. 9836)		Relevance; Hearsay; Authentication; Foundation
PX0151	DF0004744	Understanding Financial Management, A Practical Guide		Hearsay; Authentication; Foundation
PX0152	DF0004749	Valuing a Business, the Analysis and Appraisal of Closely Held Companies, 5th ed., McGraw Hill Ed. 2008), at 47.		Hearsay; Authentication; Foundation
PX0153	DG0000020	Patent US 7,082,677 B2, Assembly Line for Mounted Units		Relevance
PX0154	DG0000430	WardsAuto Website, GM Buying Into Tesco Measurement Cell		Hearsay; Authentication; Foundation
PX0155	DG0000498	Paint & Coatings Industry, Next-Generation Paint Robots, Dipl. Ing. Voigtlaender.		Hearsay; Authentication
PX0156	DG0000538	Robert Morgan, Siemens Energy & Automation Co., ECMWeb.com Article, Is Busway the best Way?		Hearsay; Authentication
PX0157	DG0001032	Kevin Lyons, Busway 101		Hearsay; Authentication
PX0158	DG0001330	US Geological Survey, Mineral Commodity Summaries 2010		Cumulative

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PX0159	DG0001974	Linda Seid Frembes, Roadready		Hearsay; Authentication
PX0160	DG0003516	Adam Cort, New Life for Conveyors		Hearsay; Authentication
PX0161	DG0003658	Electrical Installation Standard EI-1 for Buildings and Facilities		Relevance; Hearsay; Foundation
PX0162	DG0003855	Article, What's a bus weigh?		Hearsay; Authentication
PX0163	DG0003882	American Society of Appraisers, Valuing Machinery and Equipment, The Fundamentals of Appraising Machinery and Technical Assets, 3d Ed.		Relevance; Hearsay
PX0164	DG0004078	Dataref Auction data Allen Bradley Centerline Motor Control Centers		Hearsay; Authentication; Cumulative
PX0165	DG0004087	Auction asking price Filter Press 800mm		Hearsay; Authentication; Cumulative
PX0166	DG0004110	Dataref auction sale data Press Transfer TS8-3000-1500-252, 4500 TON		Hearsay; Authentication; Cumulative
PX0167	DG0004111	Auction asking price, Seawater Reverse Osmosis SWRO, 600, 3000 US Gallons, MFR Berg Co. Inc.		Hearsay; Authentication; Cumulative
PX0168	DG0004138	Auction asking price, Metchem, Inc., Water Management Inc Clarifier, 120 GPM,		Hearsay; Authentication; Cumulative
PX0169	DG0004158	Auction asking price, Abb Robotics Robit IRB6400 M97 with ABB Controller		Hearsay; Authentication; Cumulative
PX0170	DG0004266	Equipnet Auction asking price, Trane CVHF1300 Centrifugal Water Chiller		Hearsay; Authentication; Cumulative
PX0171	DG0004293	Dataref auction sale price, Fanuc R-2000IA0200F		Hearsay; Authentication; Cumulative
PX0172	DG0004298	Auction asking price, 800 GPM Automatic Triplex Industrial Water Softener		Hearsay; Authentication; Cumulative

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P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0173	DG0004311	Dataref Auction sale price JOY Turbo Air 3000 Air Compressor, Gainesville GA		Hearsay; Authentication; Cumulative
PX0174	DG0004354	Auction asking price Allen Bradley Motor Control Center lineup 800/300 buckets amp		Hearsay; Authentication; Cumulative
PX0175	DG0004389	Dataref Auction sale price, ABB Robot IRB-6400/M97		Hearsay; Authentication; Cumulative
PX0176	DG0004432	LK, LY90 Measuring Machine auction sale price, Alma, MI		Hearsay; Authentication; Cumulative
PX0177	DG0004449	Dataref Auction sale price, FANUC, M710IB 45, \$23,000, East Syracuse, NY		Hearsay; Authentication; Cumulative
PX0178	DG0004462	Belliss & Morcom Air Compressors, 1000 HP, Serial RU44041		Hearsay; Authentication; Cumulative
PX0179	DG0004497	Dataref auction sell price, Measuring Machines LK, Model LY90, Alma MI		Hearsay; Authentication; Cumulative
PX0180	DG0004506	Auction listing for 1997 Ajax Vertiplex Channel TGVP30T Melting/Holding Furnace, Solon, OH		Hearsay; Authentication; Cumulative
PX0181	DG0004523	Dataref Auction sale price CNC Gear Machinery, Gleason GP300, 6 axis CNC gear hobber, Statesville, NC		Hearsay; Authentication; Cumulative
PX0182	DG0004630	Dataref Auction sale price, buss ducts, Rossville GA		Hearsay; Authentication; Cumulative
PX0183	DG0004659	Auction asking price, Rail Mounted FANUC M710IB/45T Gantry Robot with 50' Rail		Hearsay; Authentication; Cumulative
PX0184	DG0004694	Auction ad, Muncie IN		Hearsay; Authentication; Cumulative

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PX0185	DG0004763	Auction lot, Siemens Tiastar Motor Control Centers, asking price		Hearsay; Authentication; Cumulative
PX0186	DG0004783	L&M Publications Inc., Auction sale price, UBW Boilers, UFS-42-700-150-WE-N, 700 HP		Hearsay; Authentication; Cumulative
PX0187	DG0004784	Dataref auction sale price, various Danly Transfer Presses, TS4-2000-216 X 108 TF, Wyoming, MI		Hearsay; Authentication; Cumulative
PX0188	DG0004861	Dataref auction lot		Hearsay; Authentication; Cumulative
PX0189	DG0004932	Ebay asking price Lorenz Liebherr Model LFS282 CNC Gear Shaper		Hearsay; Authentication; Cumulative
PX0190	DG0004985	Dataref auction sales data, various Schuler transfer presses, 2000 Ton, Indianapolis, IN		Hearsay; Authentication; Cumulative
PX0191	DG0005001	Auction asking price, Dominic Hunter 2400 Scfm Refrigerated Air Dryer, DRD2400		Hearsay; Authentication; Cumulative
PX0192	DG0005050	Email and notes of John Hunt, former sales for Liebherr, re valuation CFS		Hearsay; Authentication; Cumulative
PX0193	DG0005676	Google Maps of GM of Canada Ltd. to GM Powertrain Plant		
PX0194	DG0005678	Hilco Industrial, LLC auction brochure for Gear Machinery & Heat Treat Equipment		Relevance; Hearsay; Authentication
PX0195	DG0005690	Brochure and specifications for Nikon CMM machines		Hearsay; Authentication
PX0196	DG0005702	Maynards Industries auction preview of various items		Relevance; Hearsay; Authentication
PX0197	DG0005706	Maynards Industries auction brochure of GM Holden Ltd Por Melbourne, Australia, V6 DOHC Gasoline Engine Manufacturing & Assembly Line		Relevance; Hearsay; Authentication
PX0198	DUFF00001634	Email dated March 19, 2012 regarding RACER estimates for personal property for sites sold in 2011		Relevance

Exhibit D - Plaintiff's Exhibit List

P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0199	ELIO 0001	Elio Scrap and asset sales for Shreveport plant, 10/4/2016		Relevance; Hearsay; Authentication; Foundation
PX0200	ELIO 1169	Elio Shreveport Asset List		Relevance; Hearsay; Authentication; Foundation
PX0201	ELIO 1787	Elio asset price list		Relevance; Hearsay; Authentication; Foundation
PX0202	ELIO 1917	Elio Shreveport Assembly & Stamping Plant, List of Machinery, Equipment, Furniture & Other Property		Cumulative; Relevance
PX0203	ELIO 2568	Elio Shreveport- Sales - Offers		Cumulative; Relevance
PX0204	ELIO 3060	Elio asset original cost list		Relevance; Hearsay; Authentication; Foundation
PX0205	ELIO 3969	Elio Shreveport Deal Summary		Cumulative; Relevance
PX0206	ELIO 4181	Letter from Hilco Industrial, LLC to Industrial Realty Group regarding Asset Tagging of Elio Motors		Cumulative; Relevance
PX0207	ELIO 4274	Elio Asset Spreadsheet for Shreveport plant		Relevance; Hearsay; Authentication; Foundation
PX0208	ELIO 3896	Email dated January 5, 2015 regarding Elpo Line disassembly		Cumulative; Relevance
PX0209	JPMCB-MLB-0001015	First Amendment to Term Loan Agreement		Relevance
PX0210	JPMCB-2-00004883	Email dated April 21, 2009 regarding Term Loan SNC submission		Relevance
PX0211	JPMCB-2-00012237	Email dated October 10, 2008 regarding Term Lender question about Collateral Value		Relevance
PX0212	JPMCB-MLB-0005703	Email dated June 30, 2009 regarding comments to draft UCC termination statements for Term Loan Fixture Filings		Relevance
PX0213	KPMG-GM009294	Fixed asset retirement history (native)		Relevance; Cumulative
PX0214	NEWGM000126333	Memorandum of Lease GM 2003-A		Relevance
PX0215	NEWGM000126973	Memorandum of Lease CM 2003 C-1		Relevance
PX0216	MLB_TLL_00027907	Email dated July 8, 2009 requesting filing of UCC-3 Termination Statements for Term Loan Fixture Filings		Relevance
PX0217	Ex 3 to Report of Robert Mollhagen	Title Search results, 8001 Davis Hwy, Lansing, MI		Relevance
PX0218	NEWGM000005130	eFAST Data (native)		Relevance; Cumulative
PX0219	NEWGM000005131	eFAST Data (native)		Relevance; Cumulative
PX0220	NEWGM000041308	2003 C-1 Lease Agreement with Lease Supplement and Schedule 1		Relevance
PX0221	NEWGM000042350	Bill of Material, Ajax Furnace		

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P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0222	NEWGM000042498	Cupola No. 4 Revised Process Manual and Safety Instructions, Defiance Ohio		Relevance; Cumulative
PX0223	NEWGM000042997	Catalog 216A-3, Safety Recommendations for Crane and Hoist Users, P&H Material Handling Co.		Relevance; Cumulative
PX0224	NEWGM000045009	FANUC Robotics System R-30iA Controller Software Reference Manual		Relevance; Cumulative
PX0225	NEWGM000094145	Mechanical Vertical Rising Table Helical Machine, Federal Broach & Machine Co.		Relevance; Cumulative
PX0226	NEWGM000094261	Mechanical Vertical Push up Broaching Machine, Federal Broach & Machine Company		Relevance; Cumulative
PX0227	NEWGM000106368	Metris USA, Inc. LY90 asset documentation, Lansing Michigan		
PX0228	NEWGM000107693	Siemens VAC-Design and specifications		Relevance; Cumulative
PX0229	NEWGM000118726	Specifications including 4500-TON Tri-axis Transfer Press		Relevance
PX0230	NEWGM000119505	Photographs of exit conveyors, turn table, inspection table, light canopy		Relevance
PX0231	NEWGM000127132	Various M&E, by Asset IDs, location, includes various costs, book values, depreciation values, classification, tax treatment (native)		Relevance; Cumulative
PX0232	NEWGM000127279	Backup spreadsheet of assets for GM tax filings (native)		Relevance; Cumulative
PX0233	NEWGM000127280	2009 Personal Property Statement for Lansing Regional Stamping parcel no. 90-23-50-13-300-000		Relevance; Cumulative
PX0234	NEWGM000127286	2009 Personal Property Statement for Lansing Delta Township Assembly parcel no. 90-23-50-301-000		Relevance; Cumulative
PX0235	NEWGM000127292	2009 Personal Property Statement for Lansing City Various parcel no. 90-23-50-85-100-00		Relevance; Cumulative
PX0236	NEWGM000127298	2009 Personal Property Statement for Lansing Delta Township Assembly parcel no. 90-23-50-85-105-000		Relevance; Cumulative
PX0237	NEWGM000127310	2009 Personal Property Statement for Lansing City Various parcel no. 90-33-01-24-913-000		Relevance; Cumulative
PX0238	NEWGM000127322	Backup spreadsheet for GM tax filings (native)		Relevance; Cumulative
PX0239	RT00001	Duff & Phelps Appraisal for Shreveport, dated 12/18/2013		Relevance; Cumulative
PX0240	RT00844	Closing Documents for Sale by RACER Properties LLC of GVMML Pontiac Assembly		Relevance; Cumulative
PX0241	RT05035	M&E Liquidation Urgent Sites		Relevance; Cumulative
PX0242	NEWGM000122316	Part B - Press Line Description		
PX0243	HILCO_00004805	The Book - L&M Publications, Inc., datarefonline.com (Fanuc Robots)		Relevance; Cumulative
PX0244	HILCO_00004812	The Book - L&M Publications, Inc., datarefonline.com (auction dated 5/17/2011)		Relevance; Cumulative

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PX0245	HILCO_00004819	The Book - L&M Publications, Inc., datarefonline.com (auction dated 4/26/2012)		Relevance; Cumulative
PX0246	RT03570	RACER marketing material for Ypsilanti Township, Washtenaw County, MI		Relevance; Cumulative
PX0247	NEWGM000096454	Schuler "Notes for personnel and safety"		
PX0248	WEILIPMG000914059	Email dated February 15, 2007 regarding review of draft UCC Term Loan fixture filings		Relevance
PX0249	NEWGM0000117559	Photos of electrical components of B3-5 Transfer Press (Representative Asset No. 33)		Relevance; Cumulative
PX0250	NEWGM0000117549	Photos of electrical components of B3-5 Transfer Press (Representative Asset No. 33)		Relevance; Cumulative
PX0251	NEWGM0000117569	Photos of electrical components of B3-5 Transfer Press (Representative Asset No. 33)		Relevance; Cumulative
PX0252	NEWGM0000117577	Photos of Operator Stations of B3-5 Transfer Press. (Representative Asset No. 33)		Relevance; Cumulative
PX0253	NEWGM0000117587	Photos of electrical components of B3-5 Transfer Press (Representative Asset No. 33)		Relevance; Cumulative
PX0254	NEWGM0000122953	Photographs from IHI Service Manual of B3-5 Transfer Press (Representative Asset No. 33)		Relevance; Cumulative
PX0255	NEWGM0000118915	IHI Documentation including pictures of Destack Feeder, B3-5 Transfer Press (Representative Asset No. 33)		Relevance; Cumulative
PX0256	NEWGM0000095375	Picture of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press		Relevance; Cumulative
PX0257	NEWGM0000043369	Picture of Asset 28, 100 Ton Vertical Channel Holding Furnace		Relevance; Cumulative
PX0258	NEWGM0000039598	Picture of Asset 28, 100 Ton Vertical Channel Holding Furnace		Relevance; Cumulative
PX0259	Motors-MM-0000006	Emails and photos regarding AA and B presses	Miller Dep Ex AAT-Miller 005	
PX0260	KPMG-GM00000896	Support for Fresh Start Valuation as of July 10, 2009 (Real property)		
PX0261	KPMG-GM00003609	Fair Value to Fresh-Start Reconciliation (v7 to v9) Memo		
PX0262	KPMG-GM00004070	KPMG Personal Property spreadsheet		
PX0263	KPMG-GM00004134	General Motors North America Model CAFM		
PX0264	KPMG-GM00004137	GMNA_Model_BO 4 of 5_CURRENT4 spreadsheet		
PX0265	NEWGM0000000189	KPMG Report - Valuation of Total Invested Capital and Certain Assets, Liabilities and Equity Interests of General Motors Company		
PX0266	NEWGM0000003937	Utilization Cost Data spreadsheet (native)		
PX0267		General Motors Weighted Average Corporate Bond Price January 1, 2008-July 10, 2009		Relevance; Cumulative; Hearsay
PX0268		General Motors Five-Year CDS Spreads		Relevance; Cumulative; Hearsay

Exhibit D - Plaintiff's Exhibit List

P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0269		General Motors Equity Price		Relevance; Cumulative; Hearsay
PX0270		Exhibit D to Fischel Report and supporting materials		Relevance; Cumulative; Hearsay
PX0271		Exhibit E to Fischel Report and supporting materials		Relevance; Cumulative; Hearsay
PX0272		KPMG Valuation Methodology for Personal Property		Vague; Cumulative; Misstates report; Hearsay
PX0273		Professor Hubbard's Total Invested Capital and Common Equity Calculation for General Motors North America Applied to New GM		Vague; Relevance; Cumulative; Hearsay
PX0274		New GM Common Equity Calculation ex DIP Financing		Vague; Relevance; Cumulative; Hearsay
PX0275	NEWGM000125436	2003-A Participation Agreement		Relevance
PX0276	NEWGM000126365	2003 C-1 Participation Agreement		Relevance
PX0277		Plaintiff's Interrogatories to Defendants' Steering Committee, dated 1/4/2017		
PX0278		Defendants' Responses and Objections to Plaintiff's Interrogatories, dated 2/3/2017		
PX0279		Financial Accounting Standards Board (2010). Conceptual Framework for Financial Reporting. Statement of Financial Accounting Concepts No. 8		Relevance; Cumulative; Hearsay; Authentication
PX0280		Financial Accounting Standards Board (2010). Fair Value Measurements. Statement of Financial Accounting Standards No. 157		
PX0281	RT04739	Sale strategy presentation made by Hilco/Maynards dated 7/27/2009 for Alix Partners	AAT-HCO_001; RT04739; AAT-MND_001	Relevance
PX0282	NEWGM000041122	JPMCB Publication regarding Real Estate, Plants and Equipment	AAT-Pniewski_001; AT-GM_019.pdf	
PX0283	NEWGM000041227	2003-A Lease Agreement	AAT-Miller_021; NEWGM000041227	
PX0284	RT04975	Presentation by the Motors Liquidation Company titled 'Machinery and Equipment Liquidation & Site Demolition Plan'	TAB 6 - RT04975; AAT-Koch_003	Relevance
PX0285	RT05267	General Motors Corporation Presentation for Potential Liquidators	AAT-Koch_004; RT05267_MLC communication with auctioneers re goals	Relevance

Exhibit D - Plaintiff's Exhibit List

P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0286	HILCO_00003008	Liquidation Analysis of Leased GM 2001 Powertrain Assembly Lines	AAT-Deeds_002; AAT-Crabtree_002; AAT-HCO_022; AAT-HV_001	Relevance
PX0287	JPMCB-CSM-0000112	Execution Copy of Collateral Agreement	AAT-Duker_002; Collateral Agreement (JPMCB-CSM-0000112); Burshtine Dep Ex JPM-Weil	
PX0288	JPMCB-CSM-0000004	Execution Copy of Term Loan Agreement	Term Loan Agreement, Dated as of 11.29.2006; AAT-Duker_001; Burshtine Dep Ex JPM-Weil	
PX0289	KPMG-GM0092345	Auction Sales Report for various plants	AAT-MND_021; KPMG-GM0092345	Relevance
PX0290	NEWGM000004592	eFast listing	AT-GM_002.pdf; AT-GM_002.pdf; Fulcher Dep Ex AT-GM_002; Niszcza Dep Ex AT-GM_002	
PX0291	Motors-MM-000005	Photo of GG-1 press	AAT-Miller_004; AAT-HCO_011	
PX0292	NEWGM000007883	Michigan Personal Property Tax detail 2009	AT-GM_006.pdf; AT-GM_007.pdf	Relevance
PX0293	HILCO_00036690	Auction Notice for Grand Rapids plant	HILCO_00036690; AAT-Miller_001; HILCO_00036690	Relevance
PX0294	RT04580	Draft Asset Marketing Agreement between Hilco Industrial, LLC, Maynards Industries, and Motors Liquidation Corporation	AAT-Koch_002; TAB 5 - RT04580_image	Relevance
PX0295	NEWGM000106373	Photos of assets, including representative asset #19	AAT-Regiec_002; NEWGM000106373	
PX0296	EVR-E-000590596	Email dated May 8, 2009 regarding Term Loan buyback	AAT-Worth_007; AAT-Duker_017	Incomplete
PX0297	RT01060	Purchase and Sale Agreement between RACER Trust and Elio Motors	RT01060; RT01060	Relevance; Cumulative
PX0298	NEWGM000101852	Schematic of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press		
PX0299	NEWGM000101853	Schematic of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press		Relevance

Exhibit D - Plaintiff's Exhibit List

P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0300	NEWGM000101869	Schematic of Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press		Relevance
PX0301		Installation Manual for Asset 33, B3-5 Transfer Press System Incl. Destacker and End of Line		Relevance; Cumulative; Hearsay
PX0302	MAYNARDS009019	Sales at an auction at Willow Run held on 12/2/2010		Relevance
PX0303	MAYNARDS013284	Sales at an auction at GM Pittsburgh Metal Center held on 1/15/2009		Relevance
PX0304		Plaintiff's Supplemental Responses and Objections to JPMorgan Chase Bank, N.A.'s First Interrogatories		
PX0305	DF0003934	Alice Gomstyn and Charles Herman, "The Good, the Bad, and the Ugly: Auto Bailout Alternatives," ABC News, December 12, 2008		Hearsay; Relevance; Cumulative
PX0306	DF0003630	Austan D. Goolsbee and Alan B. Krueger, "A Retrospective Look at Rescuing and Restructuring General Motors and Chrysler," Journal of Economic Perspectives 29, no. 2 (2015)		Hearsay; Relevance
PX0307	DF0003535	Barclays Capital, "Recapitalization vs re-leveraging," November 10, 2008		Hearsay; Relevance
PX0308	DF0003472	Chris Isidore, "GM offers buyouts to 74,000," CNN Money, February 12, 2008		Hearsay; Relevance; Cumulative
PX0309		David Laro and Shannon P. Pratt, Business Valuation and Federal Taxes: Procedure, Law, and Perspective, 2nd Edition (Wiley, 2011)		Relevance; Incomplete
PX0310	DF0002699	Fitch, "Fitch Downgrades General Motors to 'D': Unsecured Recoveries Minimal," June 1, 2009		Hearsay; Relevance; Foundation
PX0311		Henry M. Paulson, Jr., On the Brink: Inside the Race to Stop the Collapse of the Global Financial System, (Business Plus, 2013)		Hearsay; Relevance; Foundation; Incomplete
PX0312	DF0003002	JP Morgan, "Autos Snapshot: GM Restr./ Financing: electrified cars coming," June 2, 2008		Hearsay; Relevance; Foundation
PX0313		John C. Hull, Options, Futures, and Other Derivatives, 8th Edition (Pearson Education, 2012)		Hearsay; Relevance; Incomplete
PX0314	DF0003653	John Reed, "Spyker closes purchase of Saab from GM," Financial Times, February 23, 2010		Hearsay; Relevance
PX0315	DF0002745	JP Morgan, "Q1 Cash Burn In Line; NA Sees Major Structural Cost Progress; Emerging Mkt Profits Stabilize ALERT," May 7, 2009		Hearsay; Relevance
PX0316	DF0002959	Motors Liquidation Company General Unsecured Creditors Trust, General Information, https://www.mlcguctrust.com/Page.aspx?Name=Home .		Hearsay; Relevance
PX0317	DF0003931	Nick Bunkley and Bill Vlasic, "G.M. to Close Saturn After Deal Fails," New York Times, September 30, 2009		Hearsay; Relevance

Exhibit D - Plaintiff's Exhibit List

P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0318	DF0003075	Nick Bunkley, "G.M. to Close Hummer After Sale Fails," New York Times, February 24, 2010		Hearsay; Relevance
PX0319	DF0004740	Patrick L. Anderson (2013) The Economics of Business Valuation, Stanford University Press		Hearsay; Relevance; Illegible
PX0320	DF0001414	Pooranima Gupta and Soyoun Kim, "GM drops AC Delco sale plan, sees Hummer bids soon," Reuters, April 17, 2009.		Hearsay; Relevance
PX0321		Stephen A. Ross, Randolph W. Westerfield, and Jeffery Jaffe, Corporate Finance, 6th Edition (McGraw-Hill Irwin, 2002)		Hearsay; Relevance; Incomplete
PX0322		Steven Rattner, Overhaul: An Insider's Account of the Obama Administration's Emergency Rescue of the Auto Industry (Mariner Books, 2011)		Hearsay; Relevance; Foundation
PX0323	DF0001514	UBS, "Cash Burn Accelerates," May 7, 2009		Hearsay; Relevance
PX0324	DF0003556	Wall Street Strategies, "Coverage Update and Earning Assessment Report General Motors (GM)," November 11, 2008		Hearsay; Relevance; Cumulative
PX0325		Zvi Bodie, Alex Kane and Alan Marcus, Investments, 8th Edition (McGraw-Hill Irwin, 2009)		Hearsay; Relevance; Incomplete
PX0326		GM Corporate Newsroom. (2009, July 6). GM 363 Asset Sale Approved by U.S. Bankruptcy Court. http://media.gm.com/media/us/en/gm/home.detail.html/content/Pages/news/us/en/2009/jul/0706_AssetSale.html .		Hearsay; Relevance; Foundation
PX0327		PwC, Bankruptcies and Liquidation (2014)		Hearsay; Relevance; Foundation; Cumulative
PX0328	Capital IQ	Capital IQ, Motors Liquidation Corporation Bonds data		Relevance; Hearsay
PX0329	Bloomberg	Bloomberg, FX data		Relevance; Hearsay
PX0330	Credit Market Analysis (CMA)	CMA, 5 year Senior CDS Standard Format; Mid data		Relevance; Hearsay
PX0331	Bloomberg	Bloomberg, MTLQQ US Equity, Motors Liquidation Company		Relevance; Hearsay
PX0332	Bloomberg	Corporate Credit Ratings for Old GM		Relevance; Hearsay
PX0333	RT00969	Closing Documents for Sale by Motors Liquidation Corporation to Fisker Automotive of Wilmington Boxwood Assembly		Relevance
PX0334	RT02392	Closing Documents for Sale by RACER Properties LLC to City of Wyoming Brownfield Redevelopment Authority - Grand Rapids Stamping		Relevance
PX0335	RT02470	Closing Documents for Sale by RACER Properties LLC to Ontario Business Park, LLC - Mansfield Stamping		Relevance
PX0336	RT03129	PSA for Sale by RACER Properties LLC to Ontario Business Park, LLC - Mansfield Stamping		Relevance

Exhibit D - Plaintiff's Exhibit List

P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0337	RT02906	PSA for Sale by RACER Properties LLC to Schostak Brothers & Company, Inc. - Livonia Powertrain		Relevance
PX0338	RT04957	Picture of Body Shop - Robots removed		Relevance
PX0339	RT04958	Picture of Body Shop - Robots installed		Relevance
PX0340	RT04959	Picture of Body Shop - Robots installed		Relevance
PX0341		Racer Shreveport Marketing Brochure		Hearsay; Relevance; Foundation
PX0342	KPMG-GM0002394	General Motors Corporation Support for Fresh Start Valuation as of July 10, 2009; 9B: Technology and IPR&D	AAT-KPMG 5	
PX0343	JPM/Deloitte 30	Subpoena to Deloitte & Touche, LLP & Touche, LLP, dated October 21, 2016		Relevance; Hearsay
PX0344	AAT-KPMG 1	Subpoena to KPMG LLP, dated September 26, 2016		Relevance
PX0345	provided by New GM in advance of the site visit	General Motors Delta Township Evacuation Site Plan		Authenticity; Relevance; Foundation; Hearsay
PX0346	provided by New GM in advance of the site visit	General Motors Map of Lansing		Authenticity; Relevance; Foundation; Hearsay
PX0347	KPMG-GM0092345; MAYNARDS0000795; MAYNARDS001028; MAYNARDS001297; MAYNARDS001863; MAYNARDS001952; MAYNARDS002267; MAYNARDS003170; MAYNARDS004079; MAYNARDS009019; MAYNARDS013284	Asset Auction Review Summary		Hearsay; Relevance; Foundation; Improper summary exhibit; Untimely - objections reserved
PX0348	KPMG-GM0092345; MAYNARDS0000795; MAYNARDS001028; MAYNARDS001297; MAYNARDS001863; MAYNARDS001952; MAYNARDS002267; MAYNARDS003170; MAYNARDS004079; MAYNARDS009019; MAYNARDS013284	Similar Asset Auction Lots		Hearsay; Relevance; Foundation; Improper summary exhibit; Untimely - objections reserved

Exhibit D - Plaintiff's Exhibit List

P's PX Exhibit Number	Source	Description	Deposition Exhibit Cross Reference	Defendants' Objection(s)
PX0349	NEWGM000007883; NEWGM000127279;	Asset Assessment Detail and Summary		Relevance; Improper summary exhibit; Untimely - objections reserved
PX0350	KPMG-GM0092345; MAYNARDS0000795; MAYNARDS001028; MAYNARDS001297; MAYNARDS001863; MAYNARDS001952; MAYNARDS002267; MAYNARDS003170; MAYNARDS004079; MAYNARDS009019; MAYNARDS013284	Reviewed Asset Auction Lots		Relevance; Improper summary exhibit; Untimely - objections reserved
PX0351		2016-2017 Uniform Standards of Professional Appraisal Practice, Effective Jan. 1, 2016 through Dec. 31, 2017		Relevance; Hearsay; Foundation
PX0352	NEWGM000082164; NEWGM000082204-213	FANUC Robot M-710iC Mechanical Unit Operator's Manual (excerpt)		Relevance; Incomplete
PX0353	NEWGM000109934-935; NEWGM000109943-949	Fanuc Robotics America, Inc., Generation V - Robot Transport Unit (RTU) Mechanical Assembly, Operation & Maintenance Manual (excerpt)		Relevance; Incomplete
PX0354		Siemens, Sentron Busway System Selection and Application Guide		Relevance; Hearsay; Foundation
PX0355	NEWGM000106383-NEWGM000106445	Technical Manual, Mount and Inflate, dated September 2006 (excerpt)		Relevance; Incomplete
PX0356	NEWGM000106877-NEWGM000106948	GM Tire Room Conveyors, Operation and Maintenance Manual (excerpt)		Relevance; Incomplete
PX0357	NEWGM000107733-107892	Operations, Maintenance and Safety Manual, Wheel & Tire Conveyor System		Relevance; Cumulative
PX0358	NEWGM000095623 - 660	Manual for Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press		Relevance; Cumulative
PX0359	NEWGM000096450 - 453	Manual for Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press		Relevance; Cumulative
PX0360	NEWGM000096454 - 473	Manual for Asset 32, AA-11 Schuler #1 AA Crossbar Transfer Press		Relevance; Cumulative
PX0361	NEWGM000042561 - 994	ABB Flexible Automation AB, Product Manual IRB 6400 M97A, On-line Manual		Relevance; Cumulative

Exhibit E

Matthew Feldman
Deposition Designations and Objections

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Feldman, Matthew	11/3/2016	6	23	7	1	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	7	4	7	13	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	8	19	8	21	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	8	19	8	21	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	11	23	12	18	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	14	18	14	21	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	14	18	14	21	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	14	25	16	12	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	14	25	15	6	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	15	11	16	12	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	16	17	16	19	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	16	17	16	19	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	17	19	18	3	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	17	19	18	3	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	19	6	21	8	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	19	6	23	22	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	21	22	23	22	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	25	1	26	5	Plaintiffs' Affirmative	Designation ending at the word "fair".
Feldman, Matthew	11/3/2016	25	5	25	25	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	26	5	26	10	Defendants' Counter	
Feldman, Matthew	11/3/2016	27	4	27	13	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	27	4	27	13	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	30	21	31	5	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	30	21	32	20	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	31	10	31	15	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	31	18	32	20	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	39	3	40	5	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	40	9	40	20	Defendants' Counter	
Feldman, Matthew	11/3/2016	40	21	42	4	Plaintiff's Counter to Defendants' Counter	
Feldman, Matthew	11/3/2016	41	16	43	2	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	50	8	51	25	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	52	14	54	16	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	53	15	54	3	Defendants' Objection	Irrelevant.
Feldman, Matthew	11/3/2016	54	17	54	25	Defendants' Counter	
Feldman, Matthew	11/3/2016	64	5	64	24	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	64	5	64	24	Defendants' Objection	Irrelevant.
Feldman, Matthew	11/3/2016	77	14	78	16	Plaintiffs' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Feldman, Matthew	11/3/2016	78	10	78	16	Defendants' Objection	Irrelevant.
Feldman, Matthew	11/3/2016	78	17	79	5	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	79	6	79	22	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	79	6	81	1	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	93	22	94	3	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	94	4	94	5	Defendants' Counter	
Feldman, Matthew	11/3/2016	94	7	94	7	Defendants' Counter	
Feldman, Matthew	11/3/2016	94	20	96	9	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	94	20	96	9	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	99	22	100	7	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	100	8	100	23	Defendants' Counter	
Feldman, Matthew	11/3/2016	100	24	102	12	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	102	13	102	24	Defendants' Counter	
Feldman, Matthew	11/3/2016	102	13	102	24	Plaintiff's Objection to Defendants' Counter	Irrelevant.
Feldman, Matthew	11/3/2016	102	25	103	2	Defendants' Counter	
Feldman, Matthew	11/3/2016	102	25	103	2	Plaintiff's Counter to Defendants' Counter	
Feldman, Matthew	11/3/2016	103	4	103	7	Plaintiff's Counter to Defendants' Counter	
Feldman, Matthew	11/3/2016	103	4	103	4	Defendants' Counter	
Feldman, Matthew	11/3/2016	103	9	103	11	Plaintiff's Counter to Defendants' Counter	
Feldman, Matthew	11/3/2016	106	7	107	17	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	108	20	109	25	Plaintiff's Objection to Defendants' Counter	Irrelevant.
Feldman, Matthew	11/3/2016	108	20	109	25	Defendants' Counter	
Feldman, Matthew	11/3/2016	108	20	110	6	Plaintiffs' Objection	Irrelevant.
Feldman, Matthew	11/3/2016	108	20	110	6	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	110	8	114	19	Defendants' Affirmative	
							110:8-112:15 - Irrelevant. 111:3-111:18 - Irrelevant. 113:1-114:19 - Irrelevant.
Feldman, Matthew	11/3/2016	110	8	114	19	Plaintiffs' Objection	
							110:8-112:15 - Irrelevant. 111:3-111:18 - Irrelevant. 113:1-117:2 - Irrelevant.
Feldman, Matthew	11/3/2016	111	19	117	2	Plaintiff's Objection to Defendants' Counter	
Feldman, Matthew	11/3/2016	111	19	117	2	Defendants' Counter	
Feldman, Matthew	11/3/2016	114	24	117	2	Plaintiffs' Objection	Irrelevant.
Feldman, Matthew	11/3/2016	114	24	117	2	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	117	16	117	19	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	117	16	117	19	Plaintiffs' Objection	Irrelevant.
Feldman, Matthew	11/3/2016	117	22	121	2	Plaintiffs' Objection	Irrelevant.
Feldman, Matthew	11/3/2016	117	22	121	2	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	119	2	121	2	Defendants' Counter	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Feldman, Matthew	11/3/2016	119	2	121	2	Plaintiff's Objection to Defendants' Counter	Irrelevant.
Feldman, Matthew	11/3/2016	121	3	121	6	Plaintiffs' Counter	
Feldman, Matthew	11/3/2016	121	9	121	9	Plaintiffs' Counter	
Feldman, Matthew	11/3/2016	123	17	123	24	Plaintiffs' Objection	Irrelevant.
Feldman, Matthew	11/3/2016	123	17	123	24	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	126	3	126	8	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	126	3	126	8	Plaintiffs' Objection	Irrelevant.
Feldman, Matthew	11/3/2016	127	6	127	11	Plaintiffs' Objection	Irrelevant.
Feldman, Matthew	11/3/2016	127	6	127	11	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	128	11	128	14	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	128	17	130	6	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	129	7	130	14	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	134	19	134	23	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	135	3	135	4	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	135	25	136	1	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	136	10	136	15	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	136	18	136	25	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	137	1	137	17	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	138	25	139	13	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	140	16	140	22	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	140	25	142	22	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	143	15	144	2	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	144	6	144	8	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	144	19	146	4	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	149	11	151	2	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	153	7	157	22	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	154	13	154	16	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	154	23	155	21	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	157	23	158	2	Defendants' Affirmative	
Feldman, Matthew	11/3/2016	158	11	158	25	Plaintiffs' Affirmative	
Feldman, Matthew	11/3/2016	159	20	160	22	Plaintiffs' Affirmative	

**Raymond Fulcher
Deposition Designations and Objections**

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Fulcher, Raymond	10/27/2016	7	8	7	10	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	7	8	7	10	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	8	8	8	17	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	8	8	8	25	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	8	20	8	23	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	9	21	10	12	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	9	21	10	25	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	11	1	11	1	Plaintiff's Counter to Defendants' Counter	
Fulcher, Raymond	10/27/2016	11	1	11	1	Defendants' Counter	
Fulcher, Raymond	10/27/2016	11	7	12	2	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	11	7	11	7	Defendants' Objection	Irrelevant.
Fulcher, Raymond	10/27/2016	11	8	11	18	Defendants' Affirmative	
							Irrelevant (testimony regarding personal property classification for tax purposes is not relevant to the fixture test under state property law).
Fulcher, Raymond	10/27/2016	12	13	12	20	Defendants' Objection	
Fulcher, Raymond	10/27/2016	12	13	12	20	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	13	5	13	16	Plaintiffs' Affirmative	
							Irrelevant (testimony regarding personal property classification for tax purposes is not relevant to the fixture test under state property law).
Fulcher, Raymond	10/27/2016	13	5	13	16	Defendants' Objection	
Fulcher, Raymond	10/27/2016	13	22	14	12	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	13	22	14	12	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	14	11	14	12	Plaintiff's Counter to Defendants' Counter	Designation starting at the word "It" .
Fulcher, Raymond	10/27/2016	15	13	15	18	Plaintiffs' Affirmative	
							Irrelevant (including because testimony regarding personal property classification for tax purposes is not relevant to the fixture test under state property law).
Fulcher, Raymond	10/27/2016	15	13	15	18	Defendants' Objection	
Fulcher, Raymond	10/27/2016	15	21	16	4	Plaintiffs' Affirmative	
							Irrelevant (including because testimony regarding personal property classification for tax purposes is not relevant to the fixture test under state property law).
Fulcher, Raymond	10/27/2016	15	21	16	4	Defendants' Objection	
Fulcher, Raymond	10/27/2016	17	25	18	6	Defendants' Counter	
Fulcher, Raymond	10/27/2016	22	14	22	15	Plaintiffs' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Fulcher, Raymond	10/27/2016	22	14	22	15	Defendants' Objection	Irrelevant (including because testimony not specific to fixtures, discusses all assets generally, which would include tools and other kinds of assets that are not at issue).
Fulcher, Raymond	10/27/2016	22	20	22	25	Defendants' Objection	Irrelevant (including because testimony not specific to fixtures, discusses all assets generally, which would include tools and other kinds of assets that are not at issue).
Fulcher, Raymond	10/27/2016	22	20	22	25	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	23	12	23	21	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	23	12	23	21	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	24	4	24	10	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	24	22	25	7	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	26	24	26	25	Defendants' Counter	
Fulcher, Raymond	10/27/2016	28	22	29	1	Defendants' Counter	
Fulcher, Raymond	10/27/2016	29	2	29	23	Defendants' Objection	Irrelevant.
Fulcher, Raymond	10/27/2016	29	2	30	25	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	29	24	32	9	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	32	10	32	13	Plaintiffs' Counter	
Fulcher, Raymond	10/27/2016	34	7	34	8	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	34	7	34	8	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	34	11	34	13	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	34	11	34	13	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	34	15	34	18	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	34	15	35	24	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	34	20	35	24	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	35	25	36	1	Defendants' Counter	
Fulcher, Raymond	10/27/2016	36	2	36	4	Plaintiff's Counter to Defendants' Counter	
Fulcher, Raymond	10/27/2016	36	5	36	18	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	36	5	36	18	Defendants' Objection	Irrelevant (including because testimony regarding personal property classification for tax purposes is not relevant to the fixture test under state property law).
Fulcher, Raymond	10/27/2016	36	21	36	22	Defendants' Objection	Irrelevant (including because testimony regarding personal property classification for tax purposes is not relevant to the fixture test under state property law).
Fulcher, Raymond	10/27/2016	36	21	36	22	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	37	2	37	11	Plaintiffs' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Fulcher, Raymond	10/27/2016	37	2	37	11	Defendants' Objection	Irrelevant (including because testimony regarding personal property classification for tax purposes is not relevant to the fixture test under state property law).
Fulcher, Raymond	10/27/2016	37	12	38	9	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	37	19	38	22	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	38	11	38	22	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	40	3	40	12	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	40	3	40	18	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	41	22	42	10	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	42	6	43	1	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	42	17	43	1	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	43	8	45	1	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	43	8	43	22	Defendants' Affirmative	
							Irrelevant (including because testimony not specific to fixtures, discusses all assets generally, which would include tools and other kinds of assets that are not at issue).
Fulcher, Raymond	10/27/2016	43	23	45	1	Defendants' Objection	Irrelevant (including because testimony regarding personal property classification for tax purposes is not relevant to the fixture test under state property law).
Fulcher, Raymond	10/27/2016	45	3	45	11	Defendants' Objection	
Fulcher, Raymond	10/27/2016	45	3	45	11	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	45	20	46	20	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	45	23	46	10	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	46	23	47	16	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	46	23	47	1	Defendants' Affirmative	
							Irrelevant (including because testimony regarding personal property classification for tax purposes is not relevant to the fixture test under state property law).
Fulcher, Raymond	10/27/2016	47	2	47	16	Defendants' Objection	
Fulcher, Raymond	10/27/2016	48	11	49	3	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	48	11	49	3	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	49	8	49	10	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	49	18	50	5	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	49	23	49	25	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	50	8	50	20	Defendants' Objection	Irrelevant.
Fulcher, Raymond	10/27/2016	50	8	50	20	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	50	22	50	24	Defendants' Counter	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Fulcher, Raymond	10/27/2016	50	25	51	7	Plaintiff's Counter to Defendants' Counter	
Fulcher, Raymond	10/27/2016	52	2	52	17	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	52	2	52	17	Defendants' Objection	Irrelevant; Cumulative.
Fulcher, Raymond	10/27/2016	52	22	53	6	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	53	7	53	10	Defendants' Counter	
Fulcher, Raymond	10/27/2016	53	14	54	17	Plaintiffs' Affirmative	
							Irrelevant (including because testimony not specific to fixtures, discusses all assets generally, which would include tools and other kinds of assets that are not at issue).
Fulcher, Raymond	10/27/2016	54	9	54	17	Defendants' Objection	
Fulcher, Raymond	10/27/2016	54	21	54	25	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	57	5	61	4	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	58	7	61	4	Defendants' Objection	Irrelevant; Cumulative.
Fulcher, Raymond	10/27/2016	61	7	61	16	Defendants' Objection	Irrelevant; Cumulative.
Fulcher, Raymond	10/27/2016	61	7	61	16	Plaintiffs' Affirmative	
Fulcher, Raymond	10/27/2016	61	22	63	6	Plaintiffs' Affirmative	
							Irrelevant (including because testimony not specific to fixtures, discusses all assets generally, which would include tools and other kinds of assets that are not at issue); Cumulative.
Fulcher, Raymond	10/27/2016	61	22	63	6	Defendants' Objection	
Fulcher, Raymond	10/27/2016	63	17	64	2	Plaintiffs' Affirmative	
							Irrelevant (testimony regarding personal property classification for tax purposes is not relevant to the fixture test under state property law).
Fulcher, Raymond	10/27/2016	63	17	64	2	Defendants' Objection	
Fulcher, Raymond	10/27/2016	64	4	64	21	Plaintiffs' Affirmative	
							Irrelevant (testimony regarding personal property classification for tax purposes is not relevant to the fixture test under state property law and because testimony not specific to fixtures, discusses all assets generally, which would include tools and other kinds of assets that are not at issue).
Fulcher, Raymond	10/27/2016	64	4	64	21	Defendants' Objection	
Fulcher, Raymond	10/27/2016	64	24	64	24	Plaintiffs' Affirmative	
							Irrelevant (testimony regarding personal property classification for tax purposes is not relevant to the fixture test under state property law).
Fulcher, Raymond	10/27/2016	64	24	64	24	Defendants' Objection	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Fulcher, Raymond	10/27/2016	65	1	65	3	Plaintiffs' Affirmative	Irrelevant (testimony regarding personal property classification for tax purposes is not relevant to the fixture test under state property law).
Fulcher, Raymond	10/27/2016	65	1	65	3	Defendants' Objection	Irrelevant.
Fulcher, Raymond	10/27/2016	65	6	65	8	Defendants' Objection	Irrelevant.
Fulcher, Raymond	10/27/2016	65	6	65	8	Plaintiffs' Affirmative	Irrelevant.
Fulcher, Raymond	10/27/2016	65	10	65	11	Defendants' Objection	Irrelevant.
Fulcher, Raymond	10/27/2016	65	10	65	11	Plaintiffs' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	66	18	68	18	Plaintiffs' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	66	18	68	18	Defendants' Objection	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	68	19	68	22	Defendants' Counter	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	68	23	69	3	Plaintiff's Counter to Defendants' Counter	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	72	7	72	23	Plaintiffs' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	72	7	72	23	Defendants' Objection	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	74	10	74	22	Plaintiffs' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	74	18	74	22	Defendants' Objection	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	74	25	76	7	Defendants' Objection	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	74	25	81	22	Plaintiffs' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	83	9	83	14	Defendants' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	83	16	84	21	Defendants' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	84	24	86	6	Defendants' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	86	7	86	13	Defendants' Counter	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	86	14	87	1	Defendants' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	87	7	90	11	Defendants' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	92	17	93	1	Defendants' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	93	13	95	24	Defendants' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	95	4	95	24	Plaintiffs' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	95	25	96	4	Defendants' Counter	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	96	6	96	7	Defendants' Counter	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	96	9	96	11	Plaintiffs' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	96	9	96	11	Defendants' Objection	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	96	13	96	17	Plaintiffs' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	96	13	96	17	Defendants' Objection	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	99	5	99	12	Defendants' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	99	14	99	14	Defendants' Affirmative	Cumulative; Irrelevant.
Fulcher, Raymond	10/27/2016	99	16	99	17	Defendants' Affirmative	Cumulative; Irrelevant.

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Fulcher, Raymond	10/27/2016	99	19	99	19	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	99	21	99	21	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	99	23	100	1	Defendants' Affirmative	
Fulcher, Raymond	10/27/2016	105	1	105	1	Defendants' Objection	See exhibit list for objections to deposition exhibits being offered into evidence; all other objections to exhibits are reserved.

Albert Koch
Deposition Designations and Objections

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Koch, Albert	9/15/2016	6	9	6	11	Defendants' Affirmative	
Koch, Albert	9/15/2016	6	9	6	11	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	6	17	8	5	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	6	18	8	16	Defendants' Affirmative	
Koch, Albert	9/15/2016	8	20	9	5	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	9	6	9	10	Plaintiffs' Counter	
Koch, Albert	9/15/2016	9	12	9	23	Plaintiffs' Counter	
Koch, Albert	9/15/2016	9	25	10	12	Plaintiffs' Counter	
Koch, Albert	9/15/2016	10	13	10	23	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	11	15	12	2	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	12	4	12	15	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	12	17	12	22	Defendants' Counter	
Koch, Albert	9/15/2016	12	23	12	25	Defendants' Affirmative	
Koch, Albert	9/15/2016	12	23	12	25	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	14	17	14	24	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	14	17	14	24	Defendants' Affirmative	
Koch, Albert	9/15/2016	15	15	15	19	Defendants' Affirmative	
Koch, Albert	9/15/2016	15	15	18	2	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	16	7	17	8	Defendants' Affirmative	
Koch, Albert	9/15/2016	17	9	18	2	Defendants' Affirmative	
Koch, Albert	9/15/2016	18	3	20	4	Defendants' Affirmative	
Koch, Albert	9/15/2016	20	5	20	13	Plaintiffs' Counter	
Koch, Albert	9/15/2016	20	15	20	18	Plaintiffs' Counter	
Koch, Albert	9/15/2016	20	20	21	6	Defendants' Affirmative	
Koch, Albert	9/15/2016	21	9	21	14	Defendants' Affirmative	
Koch, Albert	9/15/2016	21	15	21	18	Plaintiffs' Counter	
Koch, Albert	9/15/2016	21	19	21	22	Defendants' Affirmative	
Koch, Albert	9/15/2016	21	23	22	13	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	22	3	22	13	Defendants' Affirmative	
Koch, Albert	9/15/2016	23	7	23	20	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	23	22	25	20	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	24	8	25	5	Defendants' Affirmative	
Koch, Albert	9/15/2016	27	10	27	18	Plaintiffs' Counter	
Koch, Albert	9/15/2016	28	15	29	2	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	29	3	29	5	Defendants' Counter	
Koch, Albert	9/15/2016	29	7	29	14	Defendants' Counter	
Koch, Albert	9/15/2016	29	16	29	22	Plaintiff's Counter to Defendants' Counter	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Koch, Albert	9/15/2016	29	23	30	11	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	31	10	31	12	Defendants' Affirmative	
Koch, Albert	9/15/2016	31	14	31	25	Defendants' Affirmative	
Koch, Albert	9/15/2016	32	1	32	13	Defendants' Affirmative	
Koch, Albert	9/15/2016	32	15	32	25	Defendants' Affirmative	
Koch, Albert	9/15/2016	33	1	33	19	Defendants' Affirmative	
Koch, Albert	9/15/2016	34	6	34	9	Defendants' Affirmative	
Koch, Albert	9/15/2016	34	6	34	9	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	34	24	35	5	Defendants' Affirmative	
Koch, Albert	9/15/2016	34	24	35	5	Defendants' Affirmative	
Koch, Albert	9/15/2016	34	24	35	5	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	35	7	35	21	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	35	7	35	8	Defendants' Affirmative	
Koch, Albert	9/15/2016	35	10	35	17	Defendants' Affirmative	
Koch, Albert	9/15/2016	35	18	35	21	Defendants' Objection	Irrelevant.
Koch, Albert	9/15/2016	35	24	36	16	Defendants' Affirmative	
Koch, Albert	9/15/2016	37	3	37	10	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	37	3	37	10	Defendants' Objection	Irrelevant.
Koch, Albert	9/15/2016	37	19	39	4	Defendants' Objection	Irrelevant.
Koch, Albert	9/15/2016	37	19	39	4	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	39	5	39	8	Plaintiff's Counter to Defendants' Counter	
Koch, Albert	9/15/2016	39	9	39	19	Defendants' Counter	
Koch, Albert	9/15/2016	39	20	40	4	Plaintiff's Counter to Defendants' Counter	
Koch, Albert	9/15/2016	40	20	40	25	Defendants' Counter	
Koch, Albert	9/15/2016	41	2	41	5	Defendants' Counter	
Koch, Albert	9/15/2016	41	23	42	13	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	42	14	43	2	Defendants' Counter	
Koch, Albert	9/15/2016	43	3	43	6	Plaintiff's Counter to Defendants' Counter	
Koch, Albert	9/15/2016	43	8	43	14	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	43	8	43	14	Defendants' Objection	Irrelevant.
Koch, Albert	9/15/2016	43	16	43	25	Defendants' Objection	Irrelevant.
Koch, Albert	9/15/2016	43	16	43	25	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	45	22	46	21	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	50	12	50	14	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	50	16	51	5	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	58	2	59	5	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	62	6	63	7	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	62	6	62	8	Defendants' Objection	Irrelevant as testimony refers to Old GM.
Koch, Albert	9/15/2016	63	8	63	12	Defendants' Counter	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Koch, Albert	9/15/2016	63	13	64	14	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	64	2	64	2	Defendants' Objection	Irrelevant.
Koch, Albert	9/15/2016	64	9	64	14	Defendants' Objection	Irrelevant.
Koch, Albert	9/15/2016	65	13	66	13	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	66	9	66	13	Defendants' Objection	Irrelevant.
Koch, Albert	9/15/2016	68	10	69	5	Defendants' Affirmative	
Koch, Albert	9/15/2016	69	6	69	9	Plaintiffs' Counter	
Koch, Albert	9/15/2016	71	5	71	10	Defendants' Affirmative	
Koch, Albert	9/15/2016	71	22	72	1	Defendants' Affirmative	
Koch, Albert	9/15/2016	72	3	73	13	Defendants' Affirmative	
Koch, Albert	9/15/2016	73	14	74	5	Defendants' Counter	
Koch, Albert	9/15/2016	74	6	74	11	Defendants' Affirmative	
Koch, Albert	9/15/2016	74	12	74	14	Defendants' Counter	
Koch, Albert	9/15/2016	74	16	74	16	Defendants' Counter	
Koch, Albert	9/15/2016	74	18	75	17	Defendants' Affirmative	
Koch, Albert	9/15/2016	77	25	78	16	Defendants' Counter	
Koch, Albert	9/15/2016	79	9	80	13	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	81	18	81	20	Defendants' Affirmative	
Koch, Albert	9/15/2016	85	17	85	23	Defendants' Counter	
Koch, Albert	9/15/2016	86	2	88	5	Defendants' Counter	
Koch, Albert	9/15/2016	88	6	89	3	Plaintiff's Counter to Defendants' Counter	
Koch, Albert	9/15/2016	89	4	89	9	Plaintiffs' Counter	
Koch, Albert	9/15/2016	91	8	92	4	Defendants' Counter	
Koch, Albert	9/15/2016	92	6	94	4	Defendants' Counter	
Koch, Albert	9/15/2016	94	8	94	13	Plaintiff's Counter to Defendants' Counter	
Koch, Albert	9/15/2016	94	14	94	16	Plaintiffs' Counter	Designation ending at the word "chart".
Koch, Albert	9/15/2016	94	16	95	9	Defendants' Affirmative	
Koch, Albert	9/15/2016	95	10	95	17	Defendants' Affirmative	
Koch, Albert	9/15/2016	103	15	103	22	Plaintiffs' Counter	
Koch, Albert	9/15/2016	106	6	106	18	Plaintiffs' Counter	
Koch, Albert	9/15/2016	108	19	109	14	Defendants' Affirmative	
Koch, Albert	9/15/2016	113	7	114	2	Defendants' Affirmative	
Koch, Albert	9/15/2016	114	3	114	19	Plaintiffs' Counter	
Koch, Albert	9/15/2016	114	13	114	16	Defendants' Counter	
Koch, Albert	9/15/2016	114	21	115	11	Plaintiffs' Counter	
Koch, Albert	9/15/2016	115	13	115	17	Defendants' Counter	
Koch, Albert	9/15/2016	117	22	118	10	Defendants' Affirmative	
Koch, Albert	9/15/2016	119	14	120	3	Defendants' Affirmative	
Koch, Albert	9/15/2016	120	4	120	8	Plaintiffs' Counter	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Koch, Albert	9/15/2016	120	9	121	2	Defendants' Affirmative	
Koch, Albert	9/15/2016	124	2	124	11	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	124	14	124	22	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	125	6	125	16	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	125	17	125	23	Defendants' Counter	
Koch, Albert	9/15/2016	139	23	140	13	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	140	14	140	17	Defendants' Counter	
Koch, Albert	9/15/2016	140	18	141	1	Defendants' Affirmative	
Koch, Albert	9/15/2016	141	2	141	17	Plaintiffs' Affirmative	
Koch, Albert	9/15/2016	141	23	142	10	Defendants' Affirmative	
Koch, Albert	9/15/2016	142	13	142	16	Defendants' Affirmative	
Koch, Albert	9/15/2016	143	4	143	7	Defendants' Affirmative	
Koch, Albert	9/15/2016	148	1	148	2	Defendants' Objection	See exhibit list for objections to deposition exhibits being offered into evidence; all other objections to exhibits are reserved.

Robert Levy
Deposition Designations and Objections

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Levy, Robert	9/19/2016	6	7	6	9	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	6	7	6	9	Defendants' Affirmative	
Levy, Robert	9/19/2016	6	22	7	15	Defendants' Affirmative	
Levy, Robert	9/19/2016	7	8	7	19	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	8	3	8	5	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	8	3	8	13	Defendants' Affirmative	
Levy, Robert	9/19/2016	8	9	8	13	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	9	20	9	23	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	12	14	12	25	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	13	11	16	11	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	16	8	16	11	Defendants' Objection	Irrelevant.
Levy, Robert	9/19/2016	19	4	19	19	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	20	2	20	3	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	20	6	20	7	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	20	12	21	4	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	21	5	21	7	Defendants' Counter	
Levy, Robert	9/19/2016	21	8	22	5	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	22	13	22	22	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	23	21	24	2	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	24	3	24	10	Defendants' Counter	
Levy, Robert	9/19/2016	24	11	24	20	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	24	21	24	22	Defendants' Counter	
Levy, Robert	9/19/2016	24	24	25	9	Defendants' Counter	
Levy, Robert	9/19/2016	25	19	25	25	Plaintiff's Counter to Defendants' Counter	
Levy, Robert	9/19/2016	26	5	26	14	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	26	16	26	16	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	27	10	27	17	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	27	18	27	21	Defendants' Counter	
Levy, Robert	9/19/2016	27	22	28	16	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	28	21	28	22	Defendants' Affirmative	
Levy, Robert	9/19/2016	29	7	29	8	Defendants' Affirmative	
Levy, Robert	9/19/2016	29	13	30	20	Defendants' Affirmative	
Levy, Robert	9/19/2016	30	21	30	22	Plaintiffs' Counter	
Levy, Robert	9/19/2016	30	25	31	21	Plaintiffs' Counter	
Levy, Robert	9/19/2016	32	6	32	9	Plaintiffs' Counter	
Levy, Robert	9/19/2016	32	21	33	5	Defendants' Affirmative	
Levy, Robert	9/19/2016	33	7	33	8	Defendants' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Levy, Robert	9/19/2016	35	6	35	19	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	36	7	38	14	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	37	19	38	6	Defendants' Objection	Irrelevant (the witness does not have actual knowledge on these issues, and is making assumptions).
Levy, Robert	9/19/2016	38	16	40	5	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	38	22	38	24	Defendants' Objection	Irrelevant (the witness does not have actual knowledge on these issues, and is making assumptions).
Levy, Robert	9/19/2016	39	11	39	13	Defendants' Objection	Irrelevant (the witness does not have actual knowledge on these issues, and is making assumptions).
Levy, Robert	9/19/2016	39	18	39	21	Defendants' Objection	Irrelevant (the witness does not have actual knowledge on these issues, and is making assumptions).
Levy, Robert	9/19/2016	40	7	40	20	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	40	14	40	20	Defendants' Objection	Irrelevant (the witness does not have actual knowledge on these issues, and is making assumptions).
Levy, Robert	9/19/2016	41	5	41	10	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	41	5	41	10	Defendants' Affirmative	
Levy, Robert	9/19/2016	41	12	41	14	Defendants' Affirmative	
Levy, Robert	9/19/2016	41	12	42	3	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	41	16	42	3	Defendants' Affirmative	
Levy, Robert	9/19/2016	42	5	42	9	Defendants' Affirmative	
Levy, Robert	9/19/2016	42	5	42	23	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	43	1	44	16	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	44	18	47	25	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	48	13	48	16	Defendants' Counter	
Levy, Robert	9/19/2016	48	20	48	22	Defendants' Counter	
Levy, Robert	9/19/2016	48	25	49	12	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	49	18	49	20	Defendants' Counter	
Levy, Robert	9/19/2016	49	21	50	4	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	50	8	50	12	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	52	21	52	22	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	52	24	53	11	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	53	15	53	22	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	53	24	54	7	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	55	15	55	22	Plaintiffs' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Levy, Robert	9/19/2016	57	13	57	19	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	57	23	57	24	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	58	2	58	4	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	58	17	59	7	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	59	13	59	17	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	60	6	60	6	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	60	8	60	12	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	60	15	61	1	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	61	4	61	20	Defendants' Counter	
Levy, Robert	9/19/2016	66	7	66	9	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	66	12	66	14	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	66	16	67	2	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	67	4	67	6	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	67	8	67	10	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	67	12	67	12	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	67	14	67	21	Defendants' Counter	
Levy, Robert	9/19/2016	72	5	73	1	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	73	8	73	13	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	73	17	76	14	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	79	12	79	15	Plaintiffs' Counter	
Levy, Robert	9/19/2016	79	17	79	18	Plaintiffs' Counter	
Levy, Robert	9/19/2016	81	7	81	9	Plaintiffs' Counter	
Levy, Robert	9/19/2016	81	10	81	24	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	83	12	84	5	Defendants' Counter	
Levy, Robert	9/19/2016	84	7	84	15	Defendants' Counter	
Levy, Robert	9/19/2016	84	18	84	25	Defendants' Counter	
Levy, Robert	9/19/2016	86	22	87	6	Defendants' Counter	
Levy, Robert	9/19/2016	89	4	89	9	Defendants' Affirmative	
Levy, Robert	9/19/2016	89	13	89	20	Defendants' Affirmative	
Levy, Robert	9/19/2016	90	14	90	15	Defendants' Affirmative	
Levy, Robert	9/19/2016	90	21	91	1	Defendants' Affirmative	
Levy, Robert	9/19/2016	92	11	92	22	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	93	8	93	14	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	93	23	94	9	Defendants' Counter	
Levy, Robert	9/19/2016	97	16	98	7	Defendants' Counter	
Levy, Robert	9/19/2016	98	8	98	10	Plaintiff's Counter to Defendants' Counter	
Levy, Robert	9/19/2016	103	18	103	21	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	103	23	104	2	Defendants' Counter	
Levy, Robert	9/19/2016	104	13	104	24	Defendants' Counter	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Levy, Robert	9/19/2016	104	25	105	1	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	105	2	105	14	Defendants' Counter	
Levy, Robert	9/19/2016	105	15	106	15	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	110	22	111	2	Defendants' Counter	
Levy, Robert	9/19/2016	111	3	111	5	Plaintiff's Counter to Defendants' Counter	
Levy, Robert	9/19/2016	111	6	112	5	Defendants' Counter	
Levy, Robert	9/19/2016	115	9	116	9	Defendants' Affirmative	
Levy, Robert	9/19/2016	130	10	130	19	Defendants' Affirmative	
Levy, Robert	9/19/2016	130	20	130	20	Plaintiffs' Counter	
Levy, Robert	9/19/2016	130	22	131	2	Plaintiffs' Counter	
Levy, Robert	9/19/2016	131	4	132	11	Defendants' Affirmative	
Levy, Robert	9/19/2016	133	10	133	13	Defendants' Affirmative	
Levy, Robert	9/19/2016	135	14	135	16	Plaintiffs' Counter	Designation ending at the word "bottom".
Levy, Robert	9/19/2016	135	16	136	3	Defendants' Affirmative	
Levy, Robert	9/19/2016	136	9	136	15	Defendants' Counter	
Levy, Robert	9/19/2016	136	16	136	24	Defendants' Affirmative	
Levy, Robert	9/19/2016	137	5	137	17	Defendants' Counter	
Levy, Robert	9/19/2016	137	19	137	19	Defendants' Counter	
Levy, Robert	9/19/2016	137	21	138	2	Defendants' Counter	
Levy, Robert	9/19/2016	138	11	138	22	Defendants' Affirmative	
Levy, Robert	9/19/2016	140	16	140	22	Defendants' Affirmative	
Levy, Robert	9/19/2016	140	16	142	17	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	140	24	141	24	Defendants' Affirmative	
Levy, Robert	9/19/2016	142	20	143	14	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	143	15	144	2	Defendants' Counter	
Levy, Robert	9/19/2016	144	3	144	5	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	145	21	146	15	Defendants' Affirmative	
Levy, Robert	9/19/2016	146	7	146	15	Plaintiffs' Objection	Irrelevant.
Levy, Robert	9/19/2016	146	24	147	16	Defendants' Affirmative	
Levy, Robert	9/19/2016	147	25	148	6	Defendants' Affirmative	
Levy, Robert	9/19/2016	148	14	149	19	Defendants' Counter	
Levy, Robert	9/19/2016	149	21	149	22	Defendants' Counter	
Levy, Robert	9/19/2016	150	20	150	24	Defendants' Counter	
Levy, Robert	9/19/2016	151	1	151	1	Defendants' Counter	
Levy, Robert	9/19/2016	153	11	153	16	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	153	18	153	20	Plaintiff's Counter to Defendants' Counter	
Levy, Robert	9/19/2016	153	23	154	12	Defendants' Counter	
Levy, Robert	9/19/2016	154	13	155	9	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	155	10	155	17	Defendants' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Levy, Robert	9/19/2016	155	19	157	2	Defendants' Affirmative	
Levy, Robert	9/19/2016	157	4	157	6	Defendants' Affirmative	
Levy, Robert	9/19/2016	157	8	157	14	Defendants' Affirmative	
Levy, Robert	9/19/2016	157	21	158	2	Defendants' Counter	
Levy, Robert	9/19/2016	158	13	158	20	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	160	23	161	15	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	160	23	161	15	Defendants' Affirmative	
Levy, Robert	9/19/2016	161	17	162	7	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	161	17	161	17	Defendants' Affirmative	
Levy, Robert	9/19/2016	161	19	161	20	Defendants' Affirmative	
Levy, Robert	9/19/2016	162	13	162	23	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	163	7	163	16	Plaintiffs' Affirmative	
Levy, Robert	9/19/2016	163	17	163	21	Defendants' Counter	
Levy, Robert	9/19/2016	176	1	176	1	Defendants' Objection	See exhibit list for objections to deposition exhibits being offered into evidence; all other objections to exhibits are reserved.

Gregory Miocic
Deposition Designations and Objections

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Miocic, Gregory	10/28/2016	8	1	8	3	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	8	1	8	3	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	8	6	8	8	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	8	6	8	8	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	8	25	9	15	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	8	25	9	15	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	14	7	15	19	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	14	7	15	19	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	15	22	15	25	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	15	22	15	25	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	16	2	17	5	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	16	2	17	5	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	17	12	17	14	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	17	12	17	14	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	17	20	18	7	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	17	20	18	7	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	18	10	19	14	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	18	10	19	14	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	20	1	20	9	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	20	1	20	9	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	22	20	23	3	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	22	20	23	3	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	23	18	24	15	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	23	18	24	15	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	24	20	25	20	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	24	20	25	20	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	26	19	28	7	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	26	19	28	7	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	28	11	28	16	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	28	11	28	16	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	28	20	29	17	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	28	20	29	17	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	29	19	29	19	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	29	19	29	19	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	29	25	30	17	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	29	25	30	17	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	30	19	30	19	Plaintiffs' Objection	Irrelevant.

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Miocic, Gregory	10/28/2016	30	19	30	19	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	30	21	30	23	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	30	21	30	23	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	31	18	31	23	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	31	18	31	23	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	32	9	32	14	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	32	9	32	14	Plaintiffs' Objection	Irrelevant
Miocic, Gregory	10/28/2016	32	16	32	16	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	32	16	32	16	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	32	18	32	23	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	32	18	32	23	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	33	6	33	12	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	33	6	33	12	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	34	3	34	9	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	34	11	34	11	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	34	13	34	19	Defendants' Counter	
Miocic, Gregory	10/28/2016	37	21	38	4	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	37	21	38	4	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	38	5	38	7	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	38	5	38	7	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	38	10	38	12	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	38	10	38	12	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	38	14	39	12	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	38	14	39	12	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	39	15	39	17	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	39	15	39	17	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	39	19	39	22	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	39	19	39	22	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	39	24	40	4	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	40	9	41	10	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	40	9	41	10	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	41	12	41	17	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	41	12	41	17	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	41	19	42	15	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	41	19	42	15	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	43	6	44	23	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	43	6	44	23	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	45	1	45	11	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	45	1	45	11	Defendants' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Miocic, Gregory	10/28/2016	45	13	46	18	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	45	13	46	18	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	46	20	46	20	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	46	20	46	20	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	46	22	49	7	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	46	22	49	7	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	49	8	49	11	Plaintiffs' Counter	
							Irrelevant; Mr. Miocic specifically directed the parties how to clarify his confusion regarding what KPMG's "Fair Values" represented at several points later in his testimony (51:6-11; 84:7-85:6). After employing this methodology, it is clear that Deloitte's "KPMG Fair Value" numbers represent KPMG's RCNLD values, not the TIC Adjusted values.
Miocic, Gregory	10/28/2016	49	8	50	8	Defendants' Objection to Plaintiff's Counter	
Miocic, Gregory	10/28/2016	49	13	49	17	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	49	19	50	8	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	51	6	51	19	Defendants' Counter	
Miocic, Gregory	10/28/2016	51	20	52	4	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	51	20	52	4	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	52	6	52	6	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	52	6	52	6	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	52	16	53	22	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	52	16	53	22	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	57	19	57	21	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	57	25	58	3	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	58	13	59	8	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	59	9	59	15	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	59	9	59	15	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	60	3	60	9	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	60	10	61	3	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	60	10	61	3	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	63	24	64	5	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	64	7	64	10	Plaintiffs' Counter	Designation ending at the number "21."
Miocic, Gregory	10/28/2016	64	10	64	22	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	64	10	64	22	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	77	23	79	16	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	77	23	79	16	Defendants' Objection to Plaintiff's Counter	Irrelevant. See objection to 49:8-50:8.

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Miocic, Gregory	10/28/2016	79	20	79	25	Defendants' Objection to Plaintiff's Counter	Irrelevant. See objection to 49:8-50:8.
Miocic, Gregory	10/28/2016	79	20	79	25	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	80	2	80	5	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	80	2	80	5	Defendants' Objection to Plaintiff's Counter	Irrelevant. See objection to 49:8-50:8.
Miocic, Gregory	10/28/2016	80	22	81	11	Defendants' Objection to Plaintiff's Counter	Irrelevant. See objection to 49:8-50:8.
Miocic, Gregory	10/28/2016	80	22	81	11	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	81	13	81	15	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	81	13	81	15	Defendants' Objection to Plaintiff's Counter	Irrelevant. See objection to 49:8-50:8.
Miocic, Gregory	10/28/2016	82	2	82	13	Defendants' Counter	
Miocic, Gregory	10/28/2016	82	14	82	18	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	82	14	82	18	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	84	7	85	6	Defendants' Counter	
Miocic, Gregory	10/28/2016	87	8	87	15	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	87	8	87	15	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	88	6	88	17	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	88	6	88	17	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	88	18	88	25	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	88	18	88	25	Defendants' Objection to Plaintiff's Counter	Irrelevant. See objection to 49:8-50:8.
Miocic, Gregory	10/28/2016	89	1	89	2	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	89	1	89	2	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	89	4	89	5	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	89	4	89	5	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	89	7	89	11	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	89	7	89	11	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	89	21	90	15	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	90	16	90	25	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	90	16	90	25	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	90	16	90	25	Defendants' Counter	
Miocic, Gregory	10/28/2016	91	2	91	17	Defendants' Counter	
Miocic, Gregory	10/28/2016	91	2	91	10	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	91	2	91	10	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	91	12	93	15	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	91	12	93	15	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	93	17	93	20	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	93	17	93	20	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	93	22	93	25	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	93	22	93	25	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	94	1	94	3	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	94	5	94	11	Plaintiffs' Counter	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Miocic, Gregory	10/28/2016	94	17	95	22	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	95	23	96	14	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	95	23	96	14	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	96	16	96	18	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	96	16	96	18	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	96	20	97	11	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	96	20	97	11	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	97	12	99	17	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	100	10	100	17	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	100	10	100	17	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	100	19	100	19	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	100	19	100	19	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	100	21	101	3	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	101	5	101	6	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	102	20	105	8	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	106	13	107	5	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	107	11	107	15	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	107	17	107	18	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	107	20	107	23	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	107	25	108	5	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	108	8	108	11	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	109	17	109	20	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	109	17	109	20	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Miocic, Gregory	10/28/2016	109	22	109	22	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Miocic, Gregory	10/28/2016	109	22	109	22	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	111	1	111	7	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	111	1	111	7	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	111	13	111	16	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	111	13	111	16	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	111	18	111	20	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	111	18	111	20	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	112	4	112	10	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	112	11	112	16	Defendants' Counter	
Miocic, Gregory	10/28/2016	112	17	112	22	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	116	10	116	13	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	116	16	116	18	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	116	20	117	4	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	117	8	117	21	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	117	23	117	23	Plaintiffs' Counter	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Miocic, Gregory	10/28/2016	117	25	118	6	Defendants' Counter	
Miocic, Gregory	10/28/2016	119	7	119	8	Defendants' Counter	
Miocic, Gregory	10/28/2016	119	10	119	10	Defendants' Counter	
Miocic, Gregory	10/28/2016	120	18	120	25	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Miocic, Gregory	10/28/2016	120	18	120	25	Plaintiffs' Counter	
Miocic, Gregory	10/28/2016	122	16	123	13	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	122	16	123	13	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	123	15	123	15	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	123	15	123	15	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	124	15	124	19	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	124	15	124	19	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	124	22	124	22	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	124	22	124	22	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	124	24	125	2	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	124	24	125	2	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	125	5	125	5	Defendants' Affirmative	
Miocic, Gregory	10/28/2016	125	5	125	5	Plaintiffs' Objection	Irrelevant.
Miocic, Gregory	10/28/2016	125	7	125	22	Defendants' Counter	
Miocic, Gregory	10/28/2016	125	25	126	1	Defendants' Counter	

G. Mustafa Mohatarem
Deposition Designations and Objections

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Mohatarem, G. Mustafa	11/15/2016	6	4	6	6	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	6	4	6	6	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	8	1	9	11	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	8	1	9	11	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	9	15	9	19	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	9	15	9	19	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	10	8	10	10	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	10	8	10	10	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	10	17	11	4	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	10	17	11	4	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	11	16	11	20	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	11	16	11	20	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	11	25	12	16	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	11	25	12	16	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	12	17	13	25	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	12	17	13	25	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	14	4	14	24	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	14	4	14	24	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	15	7	15	13	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	15	7	15	13	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	15	22	16	7	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	15	22	16	7	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	16	9	18	4	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	16	9	18	4	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	18	20	20	24	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	18	20	20	24	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	21	2	21	11	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	21	2	21	11	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	21	18	22	25	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	21	18	22	25	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	23	3	23	6	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	23	3	23	6	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	23	7	23	25	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	23	7	23	25	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	24	1	24	8	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	24	1	24	8	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	24	9	24	13	Plaintiffs' Counter	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Mohatarem, G. Mustafa	11/15/2016	24	14	24	24	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	24	14	24	24	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	25	4	26	10	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	25	4	26	10	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	26	16	26	23	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	26	16	26	23	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	26	25	27	3	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	26	25	27	3	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	27	5	27	7	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	27	5	27	7	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	28	15	28	19	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	28	15	28	19	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	29	2	32	11	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	29	2	32	11	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	32	13	33	12	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	32	13	33	12	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	33	17	34	2	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	33	17	34	2	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	34	3	34	17	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	34	3	34	17	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	35	3	35	25	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	35	3	35	25	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	36	18	36	24	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	36	18	36	24	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	37	6	37	19	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	37	6	37	19	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	37	20	38	7	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	38	12	38	16	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	38	12	38	16	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	39	4	39	13	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	39	19	39	24	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	39	19	39	24	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	39	25	40	3	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	40	5	40	20	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	40	21	41	3	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	40	21	41	3	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	41	6	41	6	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	41	6	41	6	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	41	10	41	12	Plaintiffs' Objection	Irrelevant.

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Mohatarem, G. Mustafa	11/15/2016	41	10	41	12	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	41	14	42	2	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	41	14	42	2	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	42	3	42	12	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	42	3	42	12	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	43	23	44	1	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	43	23	44	1	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	44	19	47	14	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	44	19	47	14	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	47	16	47	18	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	47	16	47	18	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	47	20	48	12	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	47	20	48	12	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	48	15	48	25	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	48	15	48	25	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	50	11	51	8	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	50	11	51	8	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	51	9	51	15	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	51	23	52	1	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	51	23	52	1	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	52	12	53	19	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	52	12	53	19	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	54	9	54	13	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	54	9	54	13	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	55	1	55	5	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	56	9	57	9	Plaintiffs' Objection	Irrelevant.
Mohatarem, G. Mustafa	11/15/2016	56	9	57	9	Defendants' Affirmative	
Mohatarem, G. Mustafa	11/15/2016	57	19	57	21	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	58	2	58	4	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	58	7	58	13	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	58	16	58	24	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	58	16	58	24	Defendants' Objection to Plaintiffs' Counter	Irrelevant (see 58:7-11).
Mohatarem, G. Mustafa	11/15/2016	59	6	59	8	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	59	10	59	13	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	59	15	59	19	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	61	4	61	6	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	61	8	61	9	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	61	11	61	16	Plaintiffs' Counter	
Mohatarem, G. Mustafa	11/15/2016	61	18	61	19	Plaintiffs' Counter	

Jeffrey Niszcak
Deposition Designations and Objections

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Niszcak, Jeffrey	10/27/2016	7	8	7	10	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	7	8	7	10	Defendants' Affirmative	
Niszcak, Jeffrey	10/27/2016	8	8	8	15	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	8	8	8	15	Defendants' Affirmative	
Niszcak, Jeffrey	10/27/2016	10	11	11	19	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	10	11	11	19	Defendants' Affirmative	
Niszcak, Jeffrey	10/27/2016	13	16	14	1	Defendants' Affirmative	
Niszcak, Jeffrey	10/27/2016	13	16	13	19	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	13	22	13	25	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	14	6	14	17	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	14	25	15	16	Defendants' Affirmative	
Niszcak, Jeffrey	10/27/2016	15	2	15	25	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	19	1	19	5	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	19	1	19	5	Defendants' Affirmative	
Niszcak, Jeffrey	10/27/2016	19	10	20	5	Defendants' Affirmative	
Niszcak, Jeffrey	10/27/2016	19	10	20	5	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	20	11	20	13	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	21	3	21	5	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	21	13	21	20	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	21	21	22	2	Defendants' Affirmative	
Niszcak, Jeffrey	10/27/2016	22	20	23	1	Defendants' Affirmative	
Niszcak, Jeffrey	10/27/2016	22	23	23	1	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	23	11	25	8	Defendants' Affirmative	
Niszcak, Jeffrey	10/27/2016	25	10	25	13	Defendants' Affirmative	
Niszcak, Jeffrey	10/27/2016	26	22	27	6	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	27	22	28	2	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	28	3	28	5	Defendants' Counter	
Niszcak, Jeffrey	10/27/2016	28	23	29	15	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	30	5	31	12	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	33	5	33	15	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	33	16	33	19	Defendants' Counter	
Niszcak, Jeffrey	10/27/2016	34	12	35	6	Plaintiffs' Affirmative	
Niszcak, Jeffrey	10/27/2016	35	7	35	22	Defendants' Counter	
Niszcak, Jeffrey	10/27/2016	35	23	36	23	Plaintiff's Counter to Defendants' Counter	
Niszcak, Jeffrey	10/27/2016	37	1	37	10	Defendants' Affirmative	
Niszcak, Jeffrey	10/27/2016	37	19	38	2	Defendants' Affirmative	
Niszcak, Jeffrey	10/27/2016	40	7	40	17	Defendants' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Niszczak, Jeffrey	10/27/2016	40	25	41	5	Plaintiffs' Counter	
Niszczak, Jeffrey	10/27/2016	42	8	42	14	Plaintiffs' Counter	
Niszczak, Jeffrey	10/27/2016	44	4	44	11	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	47	3	48	1	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	49	12	50	24	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	49	24	49	25	Defendants' Objection	Irrelevant (Mr. Furey, a finance manager's, opinion regarding the "Economic Useful Life" of Machinery is irrelevant since he is not qualified to provide that opinion).
Niszczak, Jeffrey	10/27/2016	50	23	50	24	Defendants' Objection	Irrelevant (Mr. Furey, a finance manager's, opinion regarding the "Economic Useful Life" of Machinery is irrelevant since he is not qualified to provide that opinion).
Niszczak, Jeffrey	10/27/2016	51	1	51	2	Defendants' Objection	Irrelevant (Mr. Furey, a finance manager's, opinion regarding the "Economic Useful Life" of Machinery is irrelevant since he is not qualified to provide that opinion).
Niszczak, Jeffrey	10/27/2016	51	1	52	15	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	51	10	51	14	Defendants' Objection	Irrelevant (Mr. Furey, a finance manager's, opinion regarding the "Economic Useful Life" of Machinery is irrelevant since he is not qualified to provide that opinion).
Niszczak, Jeffrey	10/27/2016	51	24	52	1	Defendants' Objection	Irrelevant (Mr. Furey, a finance manager's, opinion regarding the "Economic Useful Life" of Machinery is irrelevant since he is not qualified to provide that opinion).
Niszczak, Jeffrey	10/27/2016	52	13	52	15	Defendants' Objection	Irrelevant (Mr. Furey, a finance manager's, opinion regarding the "Economic Useful Life" of Machinery is irrelevant since he is not qualified to provide that opinion).
Niszczak, Jeffrey	10/27/2016	54	7	54	25	Defendants' Objection	Irrelevant to the extent the witness is talking about assets generically.
Niszczak, Jeffrey	10/27/2016	54	7	54	25	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	55	2	56	13	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	55	2	56	10	Defendants' Objection	Irrelevant to the extent the witness is talking about assets (which can include wholly irrelevant categories such as tooling or office furniture) generically.
Niszczak, Jeffrey	10/27/2016	56	11	56	13	Defendants' Objection	Irrelevant (see 58:16-59:1).

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Niszczak, Jeffrey	10/27/2016	56	15	56	20	Defendants' Objection	Irrelevant (see 58:16-59:1).
Niszczak, Jeffrey	10/27/2016	56	15	56	20	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	58	1	58	15	Defendants' Counter	
Niszczak, Jeffrey	10/27/2016	58	16	58	19	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	58	20	59	2	Defendants' Counter	
Niszczak, Jeffrey	10/27/2016	59	10	59	10	Defendants' Affirmative	
Niszczak, Jeffrey	10/27/2016	59	14	59	14	Defendants' Affirmative	
Niszczak, Jeffrey	10/27/2016	59	16	59	25	Defendants' Affirmative	
Niszczak, Jeffrey	10/27/2016	59	16	59	25	Defendants' Affirmative	
Niszczak, Jeffrey	10/27/2016	60	7	60	15	Defendants' Affirmative	
Niszczak, Jeffrey	10/27/2016	60	17	61	5	Defendants' Affirmative	
Niszczak, Jeffrey	10/27/2016	63	25	64	13	Plaintiffs' Affirmative	
							Irrelevant to the extent the witness is talking about assets (which can include wholly irrelevant categories such as tooling or office furniture) generically.
Niszczak, Jeffrey	10/27/2016	63	25	64	13	Defendants' Objection	
Niszczak, Jeffrey	10/27/2016	67	6	67	9	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	67	21	69	7	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	70	17	71	15	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	70	22	71	3	Defendants' Affirmative	
Niszczak, Jeffrey	10/27/2016	78	12	78	15	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	78	17	78	22	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	81	25	82	4	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	84	8	85	5	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	85	6	85	23	Defendants' Counter	
Niszczak, Jeffrey	10/27/2016	87	9	88	2	Defendants' Counter	
Niszczak, Jeffrey	10/27/2016	88	5	88	8	Defendants' Counter	
Niszczak, Jeffrey	10/27/2016	88	10	89	24	Defendants' Counter	
Niszczak, Jeffrey	10/27/2016	90	7	90	23	Defendants' Counter	
Niszczak, Jeffrey	10/27/2016	91	9	91	14	Defendants' Affirmative	
Niszczak, Jeffrey	10/27/2016	95	6	95	7	Defendants' Affirmative	
Niszczak, Jeffrey	10/27/2016	95	11	96	9	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	95	11	95	14	Defendants' Affirmative	
Niszczak, Jeffrey	10/27/2016	95	15	95	18	Defendants' Objection	Irrelevant.
Niszczak, Jeffrey	10/27/2016	95	19	99	5	Defendants' Affirmative	
Niszczak, Jeffrey	10/27/2016	97	10	97	14	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	98	13	99	22	Plaintiffs' Affirmative	
Niszczak, Jeffrey	10/27/2016	99	17	99	22	Defendants' Affirmative	
Niszczak, Jeffrey	10/27/2016	101	1	101	7	Defendants' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Niszcza, Jeffrey	10/27/2016	101	10	101	11	Defendants' Affirmative	
Niszcza, Jeffrey	10/27/2016	101	13	101	20	Defendants' Affirmative	
Niszcza, Jeffrey	10/27/2016	101	23	101	23	Defendants' Affirmative	
Niszcza, Jeffrey	10/27/2016	101	25	102	11	Defendants' Affirmative	
Niszcza, Jeffrey	10/27/2016	102	14	102	14	Defendants' Affirmative	
Niszcza, Jeffrey	10/27/2016	102	16	102	17	Defendants' Affirmative	
Niszcza, Jeffrey	10/27/2016	121	1	121	1	Defendants' Objection	See exhibit list for objections to deposition exhibits being offered into evidence; all other objections to exhibits are reserved.

**Sharon Sheremet
Deposition Designations and Objections**

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Sheremet, Sharon	11/15/2016	6	5	6	7	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	6	5	6	7	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	6	10	6	25	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	6	10	6	25	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	7	22	8	1	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	7	22	8	1	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	8	14	9	11	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	8	14	9	11	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	10	1	10	5	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	10	1	10	5	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	10	7	11	19	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	10	7	11	19	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	12	24	13	14	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	12	24	13	14	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	15	4	15	8	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	15	4	15	8	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	15	9	15	25	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	16	1	16	25	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	16	1	16	25	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	17	23	18	1	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	17	23	18	1	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	18	20	18	21	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	18	20	18	21	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	18	24	19	23	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	18	24	19	23	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	19	25	20	8	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	19	25	20	8	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	21	18	21	21	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	21	18	21	21	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	21	24	22	4	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	21	24	22	4	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	22	6	22	15	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	22	6	22	15	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	22	16	22	20	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	22	16	22	20	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	22	23	23	23	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	22	23	23	23	Plaintiffs' Objection	Irrelevant.

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Sheremet, Sharon	11/15/2016	23	25	26	8	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	23	25	26	8	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	26	9	26	20	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	26	9	26	20	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	26	23	26	25	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	26	23	26	25	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	27	3	27	18	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	27	3	27	18	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	27	20	28	16	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	27	20	28	16	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	28	19	29	8	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	28	19	29	8	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	30	11	30	19	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	30	11	30	19	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	30	22	30	22	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	30	22	30	22	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	30	24	31	2	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	30	24	31	2	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	31	4	31	14	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	31	4	31	14	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	31	16	31	19	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	31	16	31	19	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	31	21	31	22	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	31	21	31	22	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	31	24	32	6	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	31	24	32	6	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	32	14	33	17	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	32	14	33	17	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	33	18	33	23	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	33	18	33	23	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	33	25	34	2	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	33	25	34	2	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	34	13	34	16	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	34	13	34	16	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	34	22	35	6	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	34	22	35	6	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	35	8	35	11	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	35	12	36	14	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	35	12	36	14	Defendants' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Sheremet, Sharon	11/15/2016	36	19	37	5	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	36	19	37	5	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	37	6	38	7	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	37	6	38	7	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	38	9	38	14	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	38	9	38	14	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	38	16	39	10	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	38	16	39	10	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	39	16	40	7	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	39	16	40	7	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	40	10	40	17	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	40	18	42	7	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	40	18	42	7	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	43	2	43	24	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	43	2	43	24	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	43	25	46	9	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	43	25	46	9	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	46	15	47	5	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	46	15	47	5	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	47	8	47	23	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	53	12	53	20	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	53	12	53	20	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	53	23	53	23	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	53	23	53	23	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	53	25	54	15	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	53	25	54	15	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	54	17	54	23	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	54	17	54	23	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	54	25	55	4	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	54	25	55	4	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	55	6	55	8	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	55	6	55	8	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	55	9	55	20	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	56	22	57	12	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	56	22	57	12	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	57	14	57	14	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	57	14	57	14	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	57	25	58	19	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	57	25	58	19	Defendants' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Sheremet, Sharon	11/15/2016	58	20	58	23	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	58	25	59	2	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	60	7	61	6	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	61	1	61	5	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Sheremet, Sharon	11/15/2016	61	8	61	19	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	61	15	61	19	Defendants' Objection to Plaintiff's Counter	Irrelevant; Incomplete.
Sheremet, Sharon	11/15/2016	62	19	63	21	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	65	2	65	6	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	65	21	65	23	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	65	21	65	23	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	66	16	67	6	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	66	16	67	6	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	67	7	67	12	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	67	14	68	2	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	68	4	68	7	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	68	20	68	23	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	68	20	68	23	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	68	25	69	17	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	68	25	69	17	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	69	18	70	8	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	70	10	70	16	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	70	18	71	12	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	73	7	73	8	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	73	7	74	4	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Sheremet, Sharon	11/15/2016	73	11	73	11	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	73	14	73	15	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	73	17	74	4	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	79	18	80	15	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	79	18	80	15	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	82	2	82	19	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	82	2	82	19	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	83	19	84	9	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	84	20	85	2	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	87	16	88	12	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	87	16	88	12	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	95	1	95	6	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	95	8	95	25	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	96	1	96	22	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	96	1	96	22	Defendants' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Sheremet, Sharon	11/15/2016	103	11	105	7	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	103	11	105	7	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	105	8	105	9	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	106	4	106	10	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	106	4	106	10	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	106	13	107	10	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	106	13	107	10	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	110	8	110	20	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	110	21	111	7	Plaintiffs' Objection	Irrelevant.
Sheremet, Sharon	11/15/2016	110	21	111	7	Defendants' Affirmative	
Sheremet, Sharon	11/15/2016	115	1	115	4	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	115	16	115	20	Plaintiffs' Counter	
Sheremet, Sharon	11/15/2016	119	5	120	10	Plaintiffs' Counter	

Taso Sofikitis
Deposition Designations and Objections

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Sofikitis, Taso	8/31/2016	6	9	6	11	Defendants' Affirmative	
Sofikitis, Taso	8/31/2016	6	9	6	11	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	7	10	7	24	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	7	10	8	13	Defendants' Affirmative	
Sofikitis, Taso	8/31/2016	8	4	8	13	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	9	4	9	8	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	9	4	9	8	Defendants' Affirmative	
Sofikitis, Taso	8/31/2016	14	8	15	6	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	15	17	16	2	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	17	4	17	6	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	17	15	17	22	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	19	10	19	24	Defendants' Affirmative	
Sofikitis, Taso	8/31/2016	20	18	21	10	Defendants' Counter	
Sofikitis, Taso	8/31/2016	21	11	21	20	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	22	21	24	1	Defendants' Affirmative	
Sofikitis, Taso	8/31/2016	25	6	25	18	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	25	19	26	25	Defendants' Affirmative	
Sofikitis, Taso	8/31/2016	27	8	27	21	Defendants' Affirmative	
Sofikitis, Taso	8/31/2016	27	19	29	11	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	30	11	31	6	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	33	13	34	15	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	33	16	34	20	Defendants' Affirmative	
Sofikitis, Taso	8/31/2016	38	7	39	1	Defendants' Counter	
Sofikitis, Taso	8/31/2016	39	2	39	10	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	39	11	40	3	Plaintiff's Counter to Defendants' Counter	
Sofikitis, Taso	8/31/2016	40	6	40	12	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	41	3	41	8	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	42	13	42	18	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	42	21	42	22	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	42	25	43	9	Defendants' Counter	
Sofikitis, Taso	8/31/2016	43	24	44	13	Defendants' Counter	
Sofikitis, Taso	8/31/2016	44	14	45	15	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	45	16	46	3	Defendants' Counter	
Sofikitis, Taso	8/31/2016	46	6	46	21	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	49	11	49	17	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	51	7	51	9	Plaintiffs' Affirmative	
Sofikitis, Taso	8/31/2016	52	3	52	6	Plaintiffs' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Sofkitius, Taso	8/31/2016	52	10	52	15	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	53	6	53	16	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	53	18	53	21	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	55	9	55	15	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	56	2	56	17	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	57	4	57	9	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	57	20	58	6	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	58	15	59	1	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	59	9	61	15	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	61	23	61	25	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	62	4	62	5	Defendants' Counter	
Sofkitius, Taso	8/31/2016	62	18	63	6	Defendants' Counter	
Sofkitius, Taso	8/31/2016	63	7	64	13	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	63	7	63	14	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	65	10	65	19	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	66	4	66	19	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	66	9	66	13	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	66	20	68	9	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	68	10	68	15	Plaintiffs' Counter	
Sofkitius, Taso	8/31/2016	68	10	68	15	Defendants' Counter	
Sofkitius, Taso	8/31/2016	68	16	69	12	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	68	16	68	25	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	69	13	69	17	Defendants' Counter	
Sofkitius, Taso	8/31/2016	69	22	70	1	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	70	3	70	9	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	70	17	70	25	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	71	3	72	1	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	72	5	72	18	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	72	23	73	6	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	73	12	73	23	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	74	11	74	20	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	75	3	75	6	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	75	8	77	4	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	77	19	77	21	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	77	22	78	3	Defendants' Counter	
Sofkitius, Taso	8/31/2016	78	4	79	11	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	79	23	80	1	Plaintiff's Counter to Defendants' Counter	
Sofkitius, Taso	8/31/2016	80	2	80	4	Defendants' Counter	
Sofkitius, Taso	8/31/2016	80	9	81	11	Plaintiffs' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Sofkitius, Taso	8/31/2016	81	12	81	14	Defendants' Counter	
Sofkitius, Taso	8/31/2016	81	15	82	21	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	82	22	83	10	Defendants' Counter	
Sofkitius, Taso	8/31/2016	83	11	83	14	Plaintiff's Counter to Defendants' Counter	
Sofkitius, Taso	8/31/2016	83	16	87	20	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	87	22	88	11	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	88	13	89	16	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	90	2	91	8	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	91	12	98	8	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	99	3	99	11	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	99	9	99	11	Defendants' Objection	Irrelevant.
Sofkitius, Taso	8/31/2016	99	13	100	7	Defendants' Objection	Irrelevant.
Sofkitius, Taso	8/31/2016	99	13	100	15	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	100	16	100	18	Defendants' Counter	
Sofkitius, Taso	8/31/2016	100	19	101	5	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	101	14	101	19	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	101	14	101	19	Defendants' Objection	Irrelevant (witness testifies below that he is making assumptions, 103:6-19).
Sofkitius, Taso	8/31/2016	102	2	102	17	Defendants' Objection	Irrelevant (witness testifies below that he is making assumptions, 103:6-19).
Sofkitius, Taso	8/31/2016	102	2	102	17	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	103	6	103	8	Defendants' Counter	
Sofkitius, Taso	8/31/2016	103	10	103	19	Defendants' Counter	
Sofkitius, Taso	8/31/2016	103	21	104	5	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	104	6	104	13	Defendants' Counter	
Sofkitius, Taso	8/31/2016	104	14	104	22	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	105	18	107	14	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	107	15	108	3	Defendants' Counter	
Sofkitius, Taso	8/31/2016	108	4	108	10	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	108	23	109	6	Defendants' Counter	
Sofkitius, Taso	8/31/2016	110	4	110	12	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	110	16	111	17	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	111	22	112	2	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	112	4	112	13	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	113	14	115	4	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	117	4	118	2	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	118	13	118	16	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	119	9	120	2	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	120	3	120	4	Defendants' Counter	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Sofkitius, Taso	8/31/2016	120	5	120	5	Plaintiff's Counter to Defendants' Counter	
Sofkitius, Taso	8/31/2016	120	15	122	19	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	122	21	124	4	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	124	19	125	4	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	126	21	127	1	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	127	2	127	8	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	127	23	128	16	Defendants' Counter	
Sofkitius, Taso	8/31/2016	128	17	128	20	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	128	21	128	23	Defendants' Counter	
Sofkitius, Taso	8/31/2016	128	24	129	12	Defendants' Objection	Irrelevant.
Sofkitius, Taso	8/31/2016	128	24	129	12	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	129	13	129	22	Defendants' Counter	
Sofkitius, Taso	8/31/2016	135	2	135	6	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	135	23	136	14	Defendants' Counter	
Sofkitius, Taso	8/31/2016	136	15	136	22	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	137	13	138	19	Defendants' Counter	
Sofkitius, Taso	8/31/2016	138	20	138	25	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	141	7	141	11	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	142	17	142	24	Defendants' Counter	
Sofkitius, Taso	8/31/2016	142	25	144	8	Defendants' Counter	
Sofkitius, Taso	8/31/2016	144	9	145	3	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	144	12	145	3	Defendants' Objection	Irrelevant (witness testified that he does not know the distinction between personal property and a fixture, 143:1-143:12).
Sofkitius, Taso	8/31/2016	145	9	145	11	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	145	14	146	6	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	146	15	146	20	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	147	1	147	18	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	147	21	148	5	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	149	4	149	21	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	150	15	150	16	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	150	21	152	7	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	152	13	152	15	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	152	22	153	10	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	159	25	160	7	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	160	8	160	9	Plaintiffs' Counter	
Sofkitius, Taso	8/31/2016	160	20	161	3	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	162	4	163	3	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	165	10	165	25	Defendants' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Sofkitius, Taso	8/31/2016	166	1	166	13	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	166	14	167	9	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	167	12	167	18	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	167	20	168	6	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	169	5	171	16	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	171	17	172	3	Plaintiffs' Counter	
Sofkitius, Taso	8/31/2016	173	15	174	1	Defendants' Counter	
Sofkitius, Taso	8/31/2016	174	2	174	7	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	174	25	175	5	Defendants' Counter	
Sofkitius, Taso	8/31/2016	175	7	175	14	Defendants' Counter	
Sofkitius, Taso	8/31/2016	175	17	175	19	Defendants' Counter	
Sofkitius, Taso	8/31/2016	179	24	180	4	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	180	6	182	24	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	183	9	184	2	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	185	2	185	4	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	185	2	186	19	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	185	7	185	9	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	185	15	185	18	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	199	8	199	18	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	199	19	200	22	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	204	12	205	5	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	205	7	206	6	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	206	7	206	19	Defendants' Counter	
Sofkitius, Taso	8/31/2016	206	21	207	6	Defendants' Counter	
Sofkitius, Taso	8/31/2016	207	7	207	17	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	207	18	208	4	Defendants' Counter	
Sofkitius, Taso	8/31/2016	208	5	208	12	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	208	14	208	22	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	208	23	209	2	Defendants' Counter	
Sofkitius, Taso	8/31/2016	209	13	209	22	Defendants' Counter	
Sofkitius, Taso	8/31/2016	209	24	210	12	Defendants' Counter	
Sofkitius, Taso	8/31/2016	210	13	210	15	Plaintiff's Counter to Defendants' Counter	
Sofkitius, Taso	8/31/2016	211	1	211	21	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	212	2	212	8	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	212	9	212	13	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	212	9	213	7	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	212	17	212	21	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	215	6	215	24	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	215	9	215	17	Defendants' Objection	Irrelevant.

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Sofkitius, Taso	8/31/2016	215	25	216	1	Defendants' Counter	
Sofkitius, Taso	8/31/2016	217	8	217	20	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	218	1	218	6	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	218	7	218	12	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	218	17	219	20	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	219	21	219	22	Defendants' Counter	
Sofkitius, Taso	8/31/2016	220	5	220	7	Plaintiff's Counter to Defendants' Counter	
Sofkitius, Taso	8/31/2016	220	9	220	11	Plaintiff's Counter to Defendants' Counter	
Sofkitius, Taso	8/31/2016	220	16	221	9	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	221	1	221	3	Defendants' Objection	Irrelevant (witness testified that he does not know the distinction between personal property and a fixture, 143:1-143:12).
Sofkitius, Taso	8/31/2016	221	14	221	20	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	221	22	222	3	Defendants' Counter	
Sofkitius, Taso	8/31/2016	224	25	226	1	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	225	4	225	21	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	226	20	227	11	Defendants' Counter	
Sofkitius, Taso	8/31/2016	227	13	227	14	Defendants' Counter	
Sofkitius, Taso	8/31/2016	227	16	227	18	Defendants' Counter	
Sofkitius, Taso	8/31/2016	227	19	227	21	Defendants' Objection	Irrelevant (witness testified that he does not know the distinction between personal property and a fixture, 143:1-143:12).
Sofkitius, Taso	8/31/2016	227	19	227	21	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	229	9	230	8	Defendants' Counter	
Sofkitius, Taso	8/31/2016	230	9	231	6	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	231	7	231	16	Defendants' Counter	
Sofkitius, Taso	8/31/2016	231	17	231	21	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	231	17	231	21	Defendants' Objection	Irrelevant (witness testified that he does not know the distinction between personal property and a fixture, 143:1-143:12).
Sofkitius, Taso	8/31/2016	231	22	232	11	Defendants' Counter	
Sofkitius, Taso	8/31/2016	236	24	237	24	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	237	23	237	24	Defendants' Objection	Irrelevant (witness testified that he does not know the distinction between personal property and a fixture, 143:1-143:12).
Sofkitius, Taso	8/31/2016	238	7	238	11	Defendants' Counter	
Sofkitius, Taso	8/31/2016	238	12	238	17	Plaintiff's Counter to Defendants' Counter	
Sofkitius, Taso	8/31/2016	238	18	239	7	Defendants' Counter	
Sofkitius, Taso	8/31/2016	239	19	240	12	Plaintiffs' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Sofkitius, Taso	8/31/2016	240	9	240	12	Defendants' Objection	Irrelevant (witness testified that he does not know the distinction between personal property and a fixture, 143:1-143:12).
Sofkitius, Taso	8/31/2016	240	13	240	14	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	240	15	240	20	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	240	25	241	15	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	241	4	241	15	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	241	16	241	22	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	241	23	241	25	Defendants' Counter	
Sofkitius, Taso	8/31/2016	242	2	242	10	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	242	2	242	13	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	242	11	242	13	Defendants' Objection	Irrelevant (witness testified that he does not know the distinction between personal property and a fixture, 143:1-143:12).
Sofkitius, Taso	8/31/2016	243	8	243	12	Defendants' Counter	
Sofkitius, Taso	8/31/2016	243	8	243	12	Plaintiff's Objection to Defendants' Counter	Irrelevant.
Sofkitius, Taso	8/31/2016	243	18	243	20	Plaintiff's Objection to Defendants' Counter	Irrelevant.
Sofkitius, Taso	8/31/2016	243	18	243	20	Defendants' Counter	
Sofkitius, Taso	8/31/2016	244	2	244	7	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	244	5	244	7	Defendants' Objection	Irrelevant (witness testified that he does not know the distinction between personal property and a fixture, 143:1-143:12).
Sofkitius, Taso	8/31/2016	245	6	245	19	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	245	11	245	12	Defendants' Objection	Irrelevant (witness testified that he does not know the distinction between personal property and a fixture, 143:1-143:12).
Sofkitius, Taso	8/31/2016	245	18	245	19	Defendants' Objection	Irrelevant (witness testified that he does not know the distinction between personal property and a fixture, 143:1-143:12).
Sofkitius, Taso	8/31/2016	249	17	250	3	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	252	11	253	12	Defendants' Affirmative	
Sofkitius, Taso	8/31/2016	253	14	254	9	Plaintiffs' Affirmative	
Sofkitius, Taso	8/31/2016	254	10	254	16	Defendants' Counter	
Sofkitius, Taso	8/31/2016	268	1	268	1	Defendants' Objection	See exhibit list for objections to deposition exhibits being offered into evidence; all other objections to exhibits are reserved.

Richard Starzecki
Deposition Designations and Objections

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Starzecki, Richard	8/12/2016	9	17	9	20	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	9	17	9	20	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	9	23	11	25	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	9	23	11	25	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	12	2	12	13	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	12	2	12	13	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	12	14	12	25	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	13	14	13	17	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	14	10	15	25	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	14	10	15	25	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	16	3	16	9	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	16	3	16	9	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	16	14	17	11	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	16	14	17	11	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	17	15	18	13	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	17	15	18	13	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	18	14	18	19	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	18	22	19	7	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	19	9	19	18	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	19	20	19	23	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	19	20	19	23	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	19	25	19	25	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	19	25	19	25	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	20	9	20	15	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	20	9	20	15	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	20	22	21	1	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	20	22	21	1	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	21	4	21	9	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	21	4	21	9	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	22	2	22	4	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	22	2	22	4	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	22	5	23	3	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	22	5	23	3	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	23	4	23	11	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	23	4	23	11	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	23	12	23	23	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	23	12	23	23	Defendants' Objection to Plaintiff's Counter	Irrelevant.

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Starzecki, Richard	8/12/2016	26	4	26	7	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	26	9	26	12	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	26	14	26	20	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	27	19	28	10	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	27	19	28	10	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	28	11	28	12	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	28	11	28	12	Defendants' Objection to Plaintiff's Counter	Cumulative.
Starzecki, Richard	8/12/2016	28	15	28	19	Defendants' Objection to Plaintiff's Counter	Cumulative.
Starzecki, Richard	8/12/2016	28	15	28	19	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	28	21	29	13	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	28	21	29	13	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	29	14	30	8	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	29	14	30	8	Defendants' Objection to Plaintiff's Counter	Cumulative.
Starzecki, Richard	8/12/2016	30	11	31	19	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	30	11	31	19	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	32	2	32	6	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	32	2	32	6	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	32	7	32	20	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	32	7	32	20	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Starzecki, Richard	8/12/2016	32	22	33	3	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	32	22	33	3	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	33	6	33	7	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	33	6	33	7	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	33	15	33	15	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	33	15	33	15	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	33	17	34	19	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	33	17	34	19	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	34	20	35	1	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	34	20	35	1	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	35	20	35	24	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	35	20	35	24	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	36	2	37	5	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	36	2	37	5	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	37	7	37	12	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	37	7	37	12	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	37	14	37	20	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	37	14	37	20	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	38	4	38	13	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	38	4	38	13	Plaintiffs' Objection	Irrelevant.

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Starzecki, Richard	8/12/2016	38	15	40	5	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	38	15	40	5	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	40	7	42	1	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	40	7	42	1	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	42	4	42	11	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	42	4	42	11	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	43	7	44	2	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	43	7	44	2	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	44	4	44	4	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	44	4	44	4	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	44	20	45	18	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	45	20	46	19	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	46	20	47	10	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	46	20	47	10	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	47	12	47	12	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	47	12	47	12	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	47	14	47	19	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	47	14	47	19	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	47	20	48	22	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	48	23	49	7	Defendants' Counter	
Starzecki, Richard	8/12/2016	53	17	53	20	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	53	17	53	20	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	54	7	55	5	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	54	7	55	5	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	55	22	56	14	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	55	22	56	14	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	56	15	59	9	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	62	11	62	25	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	65	16	67	5	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	67	14	67	23	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	68	11	69	6	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	68	11	69	6	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Starzecki, Richard	8/12/2016	69	18	70	4	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	70	7	70	8	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	70	10	71	15	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	71	18	71	18	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	71	20	71	22	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	71	25	72	17	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	72	25	73	7	Plaintiffs' Counter	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Starzecki, Richard	8/12/2016	73	9	75	12	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	80	3	80	10	Defendants' Counter	
Starzecki, Richard	8/12/2016	80	11	80	23	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	80	24	81	14	Defendants' Counter	
Starzecki, Richard	8/12/2016	81	16	82	4	Defendants' Counter	
Starzecki, Richard	8/12/2016	102	14	102	20	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	102	14	102	20	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	103	13	103	15	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	103	13	103	15	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	103	16	104	5	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	104	8	105	1	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	104	8	105	1	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	105	19	106	23	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	108	14	109	2	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	108	14	109	2	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	109	3	109	12	Plaintiffs' Counter	
Starzecki, Richard	8/12/2016	109	13	109	18	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	109	13	109	18	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	111	21	111	25	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	111	21	111	25	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	112	2	112	9	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	112	2	112	9	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	112	10	112	25	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	112	10	112	25	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	113	1	114	1	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	113	1	114	1	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	114	4	114	6	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	114	4	114	6	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	115	15	115	23	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	115	15	115	23	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	121	2	122	9	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	121	2	122	9	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	122	10	122	20	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	122	10	122	20	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	123	6	125	5	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	123	6	125	5	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	125	7	125	7	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	125	7	125	7	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	125	9	126	16	Defendants' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Starzecki, Richard	8/12/2016	125	9	126	16	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	126	18	127	15	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	126	18	127	15	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	127	17	127	22	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	127	17	127	22	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	127	24	128	7	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	127	24	128	7	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	129	10	129	22	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	129	10	129	22	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	153	4	156	8	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	153	4	156	8	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	156	11	157	12	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	156	11	157	12	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	157	14	157	22	Plaintiffs' Objection	Irrelevant.
Starzecki, Richard	8/12/2016	157	14	157	22	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	158	17	161	11	Defendants' Affirmative	
Starzecki, Richard	8/12/2016	158	17	161	11	Plaintiffs' Objection	Irrelevant.

Kevin Voigt
Deposition Designations and Objections

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Voigt, Kevin	9/26/2016	9	12	9	15	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	9	18	10	22	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	10	23	11	3	Plaintiffs' Counter	
							Irrelevant (see Term Lenders' Memorandum in Opposition to Avoidance Trust's Motion to Exclude the Non-Party Rule 30(b)(6) Testimony of KPMG And Deloitte).
Voigt, Kevin	9/26/2016	10	23	11	3	Defendants' Objection to Plaintiff's Counter	
							Irrelevant (see Term Lenders' Memorandum in Opposition to Avoidance Trust's Motion to Exclude the Non-Party Rule 30(b)(6) Testimony of KPMG And Deloitte).
Voigt, Kevin	9/26/2016	11	7	11	10	Defendants' Objection to Plaintiff's Counter	
Voigt, Kevin	9/26/2016	11	7	11	10	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	11	11	11	16	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	11	17	11	19	Plaintiffs' Counter	
							Irrelevant (see Term Lenders' Memorandum in Opposition to Avoidance Trust's Motion to Exclude the Non-Party Rule 30(b)(6) Testimony of KPMG And Deloitte).
Voigt, Kevin	9/26/2016	11	17	11	19	Defendants' Objection to Plaintiff's Counter	
Voigt, Kevin	9/26/2016	11	20	13	20	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	13	22	14	24	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	16	8	17	6	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	17	8	17	8	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	17	9	17	11	Plaintiffs' Counter	Designation starting at the word "Let".
Voigt, Kevin	9/26/2016	17	19	17	20	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	17	19	17	20	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	17	22	18	12	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	17	22	18	12	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	18	13	18	22	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	18	25	19	1	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	18	25	19	1	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	19	3	19	3	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	19	3	19	3	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	19	13	19	20	Plaintiffs' Counter	Designation starting at the word "There".
Voigt, Kevin	9/26/2016	19	13	19	20	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	19	22	19	22	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	19	22	19	22	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	20	6	20	14	Defendants' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Voigt, Kevin	9/26/2016	20	16	21	1	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	20	16	21	1	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	21	2	21	4	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	21	5	21	10	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	21	5	21	10	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	21	21	23	11	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	21	21	23	11	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	23	13	24	7	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	23	13	24	7	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	24	9	24	25	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	24	9	24	25	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	25	1	25	5	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	25	22	26	1	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	25	22	26	1	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	28	18	29	16	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	28	18	29	16	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	29	17	31	15	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	31	16	31	25	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	31	16	31	25	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	32	6	32	11	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	32	6	32	11	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	34	4	34	9	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	34	4	34	9	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	34	11	34	11	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	34	11	34	11	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	35	13	36	2	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	35	13	36	2	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	36	16	37	15	Plaintiffs' Objection	
Voigt, Kevin	9/26/2016	36	16	37	15	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	37	17	37	20	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	37	17	37	20	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	38	6	38	14	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	38	6	38	14	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	38	16	38	17	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	38	16	38	17	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	38	21	39	2	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	39	3	40	5	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	39	3	40	5	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	40	10	43	12	Defendants' Affirmative	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Voigt, Kevin	9/26/2016	40	10	43	12	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	43	14	44	10	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	43	14	44	10	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	44	11	45	3	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	45	4	46	10	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	45	4	46	10	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	49	2	51	4	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	49	2	51	4	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	51	5	51	17	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	51	18	52	9	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	51	18	52	9	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	52	10	53	1	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	53	24	54	12	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	56	2	56	13	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	56	2	56	13	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	56	15	56	25	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	56	15	56	25	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	57	2	57	11	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	57	2	57	11	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	57	12	58	5	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	58	6	59	7	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	58	6	59	7	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	59	8	59	11	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	59	13	59	18	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	61	17	61	20	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	61	17	61	20	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	61	22	61	22	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	61	22	61	22	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	61	24	62	5	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	61	24	62	5	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	62	13	62	17	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	62	13	62	17	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	62	20	64	2	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	62	20	64	2	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	64	12	64	17	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	64	12	64	17	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	64	19	64	25	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	64	19	64	25	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	65	2	65	8	Plaintiffs' Counter	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Voigt, Kevin	9/26/2016	66	6	66	16	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	66	6	66	16	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	66	18	67	2	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	66	18	67	2	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	67	8	68	13	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	67	8	68	13	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	68	14	68	17	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	68	18	69	3	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	68	18	69	3	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	69	4	71	15	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	71	16	71	20	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	71	16	71	20	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	71	21	72	6	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	72	11	73	7	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	72	11	73	7	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	73	14	74	11	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	73	14	74	11	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	76	9	76	11	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	76	13	76	24	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	76	25	77	7	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	76	25	77	7	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	78	6	80	4	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	78	6	80	4	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	80	5	80	23	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	80	24	83	24	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	80	24	83	24	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	83	25	84	9	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	83	25	84	9	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	84	10	84	13	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	84	19	84	23	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	84	19	84	23	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	84	24	87	9	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	87	11	88	2	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	88	4	88	13	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	88	4	88	13	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	88	14	92	4	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	92	19	93	10	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	93	22	96	9	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	97	7	99	8	Plaintiffs' Objection	Irrelevant.

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Voigt, Kevin	9/26/2016	97	7	99	8	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	99	19	103	12	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	103	13	103	22	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	103	13	103	22	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	103	23	104	5	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	103	23	104	5	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	104	6	104	24	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	105	8	105	14	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	105	15	106	10	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	105	15	106	10	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	106	11	106	15	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	107	5	108	20	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	109	4	110	15	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	112	14	113	6	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	112	14	113	6	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	118	5	119	7	Defendants' Objection to Plaintiff's Counter	Irrelevant discussion of equity valuation as of 12/31/09.
Voigt, Kevin	9/26/2016	118	5	119	7	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	119	17	119	20	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	119	17	119	20	Defendants' Objection to Plaintiff's Counter	Irrelevant discussion of equity valuation as of 12/31/09.
Voigt, Kevin	9/26/2016	119	22	120	1	Defendants' Objection to Plaintiff's Counter	Irrelevant discussion of equity valuation as of 12/31/09.
Voigt, Kevin	9/26/2016	119	22	120	1	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	120	8	121	9	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	120	8	121	9	Defendants' Objection to Plaintiff's Counter	Irrelevant discussion of equity valuation as of 12/31/09.
Voigt, Kevin	9/26/2016	123	10	123	23	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	123	13	123	23	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	124	1	124	12	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	124	1	124	12	Plaintiffs' Counter	Designation starting at the word "Support".
Voigt, Kevin	9/26/2016	125	20	126	3	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	126	17	126	25	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	127	6	127	12	Plaintiffs' Counter	Designation starting at the word "If".
Voigt, Kevin	9/26/2016	127	25	129	3	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	130	24	131	14	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	130	24	131	14	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	139	7	140	16	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	144	6	145	11	Plaintiffs' Counter	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Voigt, Kevin	9/26/2016	149	19	149	21	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	150	1	150	7	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	150	11	150	13	Plaintiffs' Counter	Designation starting at the word "Let".
Voigt, Kevin	9/26/2016	150	16	151	13	Plaintiffs' Counter	Designation starting at the word "Do".
Voigt, Kevin	9/26/2016	151	23	152	3	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	152	6	152	13	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	152	15	152	15	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	152	17	153	6	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	153	15	153	18	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	153	15	153	18	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	153	23	154	7	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	153	23	154	7	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	157	16	157	22	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	157	16	157	22	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	158	8	158	21	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	158	8	158	21	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	158	24	159	15	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	158	24	159	15	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	159	16	159	19	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	159	16	159	19	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	159	21	159	22	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	159	21	159	22	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	159	24	160	8	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	159	24	160	8	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	161	2	161	11	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	161	2	161	11	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	162	2	162	24	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	162	2	162	7	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	163	3	164	18	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	165	2	166	11	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	166	13	166	14	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	166	16	167	11	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	167	13	168	7	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	168	11	168	15	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	168	18	171	8	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	171	10	171	10	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	171	12	171	16	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	171	18	171	19	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	171	21	172	16	Plaintiffs' Counter	

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Voigt, Kevin	9/26/2016	173	7	173	25	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	177	2	177	23	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	180	2	180	13	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	180	2	180	13	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	182	17	183	11	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	182	17	183	11	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	185	5	185	12	Defendants' Objection to Plaintiff's Counter	Irrelevant.
Voigt, Kevin	9/26/2016	185	5	185	12	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	185	14	185	25	Plaintiffs' Counter	
Voigt, Kevin	9/26/2016	185	14	185	25	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	186	15	186	23	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	186	15	186	23	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	186	25	187	8	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	186	25	187	8	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	187	10	187	11	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	187	10	187	11	Defendants' Affirmative	
Voigt, Kevin	9/26/2016	187	13	187	15	Plaintiffs' Objection	Irrelevant.
Voigt, Kevin	9/26/2016	187	13	187	15	Defendants' Affirmative	

Jennifer Weigel
Deposition Designations and Objections

Transcript Name	Transcript Date	Start Page	Start Line	End Page	End Line	Type	Description
Weigel, Jennifer	11/15/2016	4	13	4	15	Plaintiffs' Affirmative	
Weigel, Jennifer	11/15/2016	4	13	4	15	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	5	12	5	18	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	5	12	5	22	Plaintiffs' Affirmative	
Weigel, Jennifer	11/15/2016	6	5	6	22	Plaintiffs' Affirmative	
Weigel, Jennifer	11/15/2016	6	5	7	16	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	7	13	7	16	Plaintiffs' Affirmative	
Weigel, Jennifer	11/15/2016	7	19	10	18	Plaintiffs' Affirmative	
Weigel, Jennifer	11/15/2016	7	19	9	1	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	10	9	10	15	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	10	17	11	2	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	11	6	11	13	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	11	9	12	20	Plaintiffs' Affirmative	
Weigel, Jennifer	11/15/2016	11	15	12	2	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	12	5	12	20	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	12	22	14	9	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	13	22	14	9	Plaintiffs' Affirmative	
Weigel, Jennifer	11/15/2016	14	15	14	19	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	14	21	15	14	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	15	16	16	20	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	16	2	16	5	Plaintiffs' Affirmative	
Weigel, Jennifer	11/15/2016	16	6	16	11	Plaintiffs' Objection	Irrelevant.
Weigel, Jennifer	11/15/2016	16	12	16	20	Plaintiffs' Affirmative	
Weigel, Jennifer	11/15/2016	17	2	19	1	Plaintiffs' Affirmative	
Weigel, Jennifer	11/15/2016	19	5	19	25	Plaintiffs' Affirmative	
Weigel, Jennifer	11/15/2016	19	5	20	9	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	21	24	22	8	Defendants' Affirmative	
Weigel, Jennifer	11/15/2016	27	1	27	1	Defendants' Objection	See exhibit list for objections to deposition exhibits being offered into evidence; all other objections to exhibits are reserved.

Exhibit F

Exhibit F: Defendants' Provisional List of Documents Underlying Summary Exhibits

Exhibit Number	Exhibit Description	Exhibit Source
DX-2001	Aswath Damodaran, Investment Valuation: Tools and Techniques for Determining the Value of any Asset (2012) (excerpt)	
DX-2002	Automotive News Data Center, U.S. Car and Light-Truck Sales by Make June 2009	
DX-2003	Chrysler Group, Financial Review: 2010-2014 Plan (November 4, 2009)	
DX-2004	Detailed List of 40 Representative Assets	
DX-2005	Disclosure Statement for Debtors' Amended Joint Chapter 11 Plan, dated December 8, 2010	Case No. 09-50026, Docket No. 8014
DX-2006	Federal Reserve Economic Data, 20-Year Treasury Constant Maturity Rate	
DX-2007	Federal Reserve Economic Data, GDP, Billions of Dollars, Annual, Not Seasonally Adjusted 1929-2015	
DX-2008	Federal Reserve Economic Data, Light Weight Vehicle Sale: Autos and Light Trucks 1976-2016	
DX-2009	Federal Reserve Economic Data, Total Vehicle Sales, Millions of Units, Monthly, Seasonally Adjusted Annual Rate 1976-2016	
DX-2010	Federal Reserve Technical Q&As: How are the seasonal factors for light vehicle sales calculated?	
DX-2011	Ibbotson Cost of Capital 2009 Yearbook (excerpt)	
DX-2012	Ibbotson SBBI 2009 Valuation Yearbook (excerpt)	
DX-2013	Industry Canada, Summary Report on Canada's Support for the Restructuring of General Motors and Chrysler in 2009	
DX-2014	International Organization of Motor Vehicles Manufacturers, World Vehicle Production 2009	
DX-2015	Manheim Consulting, Used Vehicle Value Index 1995-2016	
DX-2016	Motors Liquidation Company Bond Holders Liquidation Summary	
DX-2017	OECD, Quarterly Growth Rates of real GDP, change over same quarter from previous year Q1 2004- Q3-2016	
DX-2018	Office of Energy Efficiency & Renewable Energy, 2016 Average Historical Annual Gasoline Pump Price 1929-2015	
DX-2019	Office of the Special Inspector General for the Troubled Asset Relief Program, Quarterly Report to Congress, dated April 30, 2014 (excerpt)	
DX-2020	Second Amended and Restated Loan Agreement By and Among General Motors of Canada Limited, as Borrower, and the Other Loan Parties and Export Development Canada, as Lender, dated July 10, 2009	
DX-2021	Shannon P. Pratt and Roger J Grabowski, Cost of Capital: Applications and Examples (3d ed. 2008) (excerpt)	
DX-2022	Stuart C. Gillson, Edith S. Hotchkiss, and Richard S. Ruback, Valuation of Bankrupt Firms (2000)	
DX-2023	TARP Transactions Report for Period Ending July 31, 2009	
DX-2024	Trading Economics, United States Consumer Sentiment 1952-2016	
DX-2025	Trading Economics, United States Total Vehicle Sales 1993-2016	
DX-2026	UCLA-LoPucki Bankruptcy Research Database Query	
DX-2027	Ward's Automotive Reports, Light Vehicle Fleet Registrations by Model Year 2009	
DX-2028	Ward's Automotive Reports, Light Vehicle Sales by Segment Group 1980-2015	
DX-2029	Ward's Automotive Reports, U.S. Vehicle Sales, 1931-2015	
DX-2030	Wilmington Trust, Bond List	
DX-2031	Wilmington Trust, MLC GUC Distribution Summary	
DX-2032	General Motors Corporation, Form 10-Q for the quarterly period ending June 30, 2008	
DX-2033	General Motors Corporation, Form 10-Q for the quarterly period ending September 30, 2008	
DX-2034	Ford Motor Company, Form 10-Q for the quarterly period ending March 31, 2009	
DX-2035	General Motors Corporation, Form 10-Q for the quarterly period ending March 31, 2009	
DX-2036	General Motors Company, Form 10-Q for the quarterly period ending September 30, 2011	

Exhibit Number	Exhibit Description	Exhibit Source
DX-2037	General Motors Corporation, 2007 Form 10-K	
DX-2038	General Motors Company, 2011 Form 10-K	
DX-2039	General Motors Company, 2012 Form 10-K	
DX-2040	General Motors Company, 2013 Form 10-K	
DX-2041	General Motors Company, 2014 Form 10-K	
DX-2042	General Motors Company, 2015 Form 10-K	
DX-2043	Deloitte Machinery & Equipment Valuation Model	DT 0002242
DX-2044	Deloitte Workpaper regarding fresh start projections	DT 0006036
DX-2045	Deloitte Workpaper regarding GMNA forecast projections	DT 0006058
DX-2046	Deloitte Global Debt Valuation Model	DT 0006967
DX-2047	GM Viability Plan (VP4) Update, April 24, 2009	EV/R 100534
DX-2048	General Motors Corporation, 2009-2014 Restructuring Plan: Progress Report, Version 4	EV/R-E-000180310
DX-2049	KPMG Asset Valuation Worksheet for Buildings and Improvements	KPMG-GM0003703
DX-2050	2009 General Motors Property Tax Backup Spreadsheet - Lansing	NEWGM000127279
DX-2051	eFAST Ledger for Fixed Assets (May 2010)	NEWGM0000000747
DX-2052	KPMG Asset Valuation Worksheet for Personal Property	NEWGM0000000949
DX-2053	eFast Ledger for Fixed Assets (June 2009)	NEWGM0000005131
DX-2054	Assets GM "classified as personal property" for property tax purposes in Michigan plants (Excerpt)	NEWGM000007883
DX-2055	Second Amended and Restated Secured Credit Agreement among General Motors Company as the Initial Borrower and the U.S. Treasury as the Lender, dated August 12, 2009	UST-AAT-037359
DX-2056	Consent and Waiver No. 3 Under Loan and Security Agreement by General Motors Corporation as the Borrower and the U.S. Treasury as the Lender, dated April 29, 2009	UST-AAT-038677
DX-2057	Automotive News, GM Credit Rating Increased Two Notches by S&P (September 29, 2011)	
DX-2058	Automotive News, GM Snags Better Credit Rating from S&P Than Ford (October 7, 2010)	
DX-2059	Barclays Capital, Auto & Auto Parts Industry Overview (January 28, 2009)	
DX-2060	Chris Isidore, GM Bankruptcy: End of an Era, CNN Money (June 2, 2009)	
DX-2061	Clare Baldwin and Soyoun Kim, GM IPO Raises \$20.1 billion, Reuters (November 17, 2010)	
DX-2062	Credit Suisse, Sideways Is Not Good Enough: US Sales to Stabilize at 12.0M in 2009 (January 13, 2009)	
DX-2063	DBRS, DBRS Assigns Ratings of BB and Provisional BBB (low) to General Motors (October 19, 2010)	
DX-2064	Deutsche Bank, April US Auto Sales: Bouncing Along The Bottom (May 3, 2009)	
DX-2065	Fitch Ratings, Fitch Assigns Initial 'BB-' IDR to General Motors; Outlook Stable, (October 6, 2010)	
DX-2066	Fitch Ratings, Fitch Upgrades General Motors' IDR to 'BB'; Outlook to Positive (October 4, 2011)	
DX-2067	Moody's Investor Service, Moody's Assigns Ba2 Corporate Family Rating to General Motors (October 11, 2010)	
DX-2068	Nick Carey and David Bailey, U.S. 2009 auto sales seen at 27-year-low, Reuters (January 13, 2009)	
DX-2069	Scotia Bank, Autos & Components - Lower Auto Volume Forecast (January 21, 2009)	
DX-2070	Steve Findlay, NADA Economist Predicts 12.7 Million Sales in 2009, Ward's Auto (January 25, 2009)	
DX-2071	UBS Investment Research, Survival of the Fittest (March 19, 2009)	
DX-2072	S&P Capital IQ data for Hubbard Initial Report, Ex. 2 and Hubbard Initial Report, Ex. 3	
DX-2073	S&P Capital IQ data for Hubbard Initial Report, Ex. 27	
DX-2074	S&P Capital IQ data for Hubbard Initial Report, Exs. 45-48	

Exhibit Number	Exhibit Description	Exhibit Source
DX-2075	S&P Capital IQ and TRACE data for Hubbard Initial Report, Exs. 51 and 52	
DX-2076	S&P Capital IQ data for Hubbard Initial Report, Ex. 53	
DX-2077	Banca IMI, Fiat - An in-depth look at Chrysler BP (November 17, 2009)	
DX-2078	Banca IMI, Fiat - Chrysler's New Plan Marchionne's New Challenge (November 5, 2009)	
DX-2079	Banca IMI, Fiat - Risks on 2010, Still Waiting on Chrysler (October 22, 2009)	
DX-2080	Banca IMI, Fiat - Struggling with Cash (January 23, 2009)	
DX-2081	Banca IMI, Fiat - The Consolidation Game (May 13, 2009)	
DX-2082	Centrobanca, Fiat - The Chrysler plan our reading (November 19, 2009)	
DX-2083	Commerzbank, Volkswagen - Revaluation of Volkswagen (July 8, 2009)	
DX-2084	Credit Suisse, BMW - Challenges Create Chances (February 2, 2009)	
DX-2085	Credit Suisse, BMW - Getting ready for Oktoberfest (September 9, 2009)	
DX-2086	Credit Suisse, BMW - Strong crisis management, but quo vadis (May 6, 2009)	
DX-2087	Credit Suisse, BMW - The last transition quarter (October 23, 2009)	
DX-2088	Credit Suisse, Fiat - Chrysler Aiming High (November 5, 2009)	
DX-2089	Credit Suisse, Fiat - Chrysler can it be fixed (November 2, 2009)	
DX-2090	Credit Suisse, Fiat - First to guide on 2010 (October 21, 2009)	
DX-2091	Credit Suisse, Fiat - Industrial revolution Upgrading to Outperform (September 11, 2009)	
DX-2092	Credit Suisse, Fiat - Removing from Focus List (November 23, 2009)	
DX-2093	Credit Suisse, Fiat - Value check Raising TP to 13 (October 15, 2009)	
DX-2094	CREDIT SUISSE, Honda Motor Corp. - Strong message of no losses in FY3_10 (April 28, 2009)	
DX-2095	CREDIT SUISSE, Toyota Motor Corp. - Substantial upward-revision potential for FY3_10 (May 8, 2009)	
DX-2096	Credit Suisse, Volkswagen - Confidence and clarity are key (November 26, 2009)	
DX-2097	Credit Suisse, Volkswagen - POM Premium over mass (October 29, 2009)	
DX-2098	Credit Suisse, Volkswagen - Show me the value (November 13, 2009)	
DX-2099	Credit Suisse, Volkswagen - Switching to preference shares (July 2, 2009)	
DX-2100	Credit Suisse, Volkswagen - Tough summer sales (October 22, 2009)	
DX-2101	Deutsche Bank, Fiat - Italian Samba (October 19, 2009)	
DX-2102	Deutsche Bank, Volkswagen - Porsche - Lower Saxony Needed (April 24, 2009)	
DX-2103	Fairesearch, BMW - Debt Load Problem Intensifying (February 3, 2009)	
DX-2104	Fairesearch, BMW - In need of cash (March 24, 2009)	
DX-2105	Fairesearch, Volkswagen - Become a shareholder but don't ask questions (December 21, 2009)	
DX-2106	IIR GROUP, Ford Motor Co - Credible long term strategy but survival is the immediate objective (June 18, 2009)	
DX-2107	IIR GROUP, Ford Motor Co- Deleveraging efforts and improving operating cash flows to bolster balance sheet (December 14, 2009)	
DX-2108	IIR GROUP, Ford Motor Co- Ford receives government assistance for the production of fuel efficient vehicles (June 24, 2009)	
DX-2109	IIR GROUP, Honda Motor Co., Ltd. - 3Q 09 revenues broadly in line with our expectations (January 30, 2009)	
DX-2110	IIR GROUP, Honda Motor Co., Ltd. - Significant increase in common stock price since our previous company news (April 6, 2009)	
DX-2111	IIR GROUP, Honda Motor Co., Ltd. (HMC) - Demand to remain subdued amidst global economic slowdown (April 8, 2009)	
DX-2112	IIR GROUP, Honda Motor Co., Ltd. (HMC) - Outlook for 1H 10 shows further weakness with recovery expected from 2H 2010 (April 28, 2009)	
DX-2113	IIR GROUP, Toyota Motor Corporation - 3Q 09 profitability underperforms our expectations (February 6, 2009)	

Exhibit Number	Exhibit Description	Exhibit Source
DX-2114	IIR GROUP, Toyota Motor Corporation - Common stock price since our previous company news (April 6, 2009)	
DX-2115	IIR GROUP, Toyota Motor Corporation - Toyota expected to drive down the loss lane (April 15, 2009)	
DX-2116	IIR GROUP, Toyota Motor Corporation - Toyota expects another year of losses in FY 2010 (May 8, 2009)	
DX-2117	ING, Fiat - Announces unexpected level of net debt (January 22, 2009)	
DX-2118	ING, Fiat - Resilient but vulnerable (January 9, 2009)	
DX-2119	JPMorgan, Honda Motor 4Q Results Flash_ Last into the Slump, First to Recover (April 30, 2009)	
DX-2120	JPMorgan, Honda Motor 4Q Preview_ All-important US Market on Cusp of Recovery (April 15, 2009)	
DX-2121	JPMorgan, Toyota Motor 4Q Preview_ How to Fight Being Doomed to Mediocrity (April 15, 2009)	
DX-2122	JPMorgan, Toyota Motor FY2008 Results Flash_ 'Toyota Myth' at a Crossroads (May 11, 2009)	
DX-2123	Kepler, Fiat - Cash neutral in 2009 by no means assured (January 23, 2009)	
DX-2124	M.M. Warburg, BMW - BMW has good opportunities to close with a profit in 2009 (August 5, 2009)	
DX-2125	M.M. Warburg, BMW - New models will give profits a boost starting in 2010 (May 26, 2009)	
DX-2126	M.M. Warburg, BMW - Preparations for product offensive and weak market weigh on Q3 result (November 4, 2009)	
DX-2127	M.M. Warburg, BMW - Update (May 26, 2009)	
DX-2128	M.M. Warburg, BMW - Update (November 4, 2009)	
DX-2129	M.M. Warburg, Volkswagen - Volkswagen will emerge from the sector crisis victorious (June 29, 2009)	
DX-2130	M.M. Warburg, Volkswagen - VW is well positioned for the economic crisis (March 18, 2009)	
DX-2131	Macquarie Research, Honda Motor - Back to business as usual (June 26, 2009)	
DX-2132	Macquarie Research, Honda Motor - Healthy underlying fundamentals (August 11, 2009)	
DX-2133	Macquarie Research, Toyota Motor - Improving Margin Outlook (August 11, 2009)	
DX-2134	Macquarie Research, Toyota Motor - Recovery held back by cost base (June 26, 2009)	
DX-2135	Mediobanca, Fiat - Can miracles be repeated (May 4, 2009)	
DX-2136	Mediobanca, Fiat - Chrysler a remake of FIAT turnaround (November 23, 2009)	
DX-2137	Mediobanca, Fiat - Facing reality (April 16, 2009)	
DX-2138	Mediobanca, Fiat - Spin off or IPO (June 4, 2009)	
DX-2139	Metzler, Volkswagen pref. (March 17, 2009)	
DX-2140	Morgan Stanley, Fiat - Principe di Detroit Chrysler Could Triple This Stock (October 1, 2009)	
DX-2141	Morgan Stanley, Fiat - Raising Target to 18.50 on Record Brazilian Car Market (November 11, 2009)	
DX-2142	RBS, BMW - Ahead of consensus (September 21, 2009)	
DX-2143	RBS, BMW - Ahead of the curve (March 24, 2009)	
DX-2144	RBS, BMW - Q and A (March 25, 2009)	
DX-2145	RBS, BMW - Sept US sales - signs of hope (October 2, 2009)	
DX-2146	RBS, BMW - Step by step (May 7, 2009)	
DX-2147	RBS, BMW - Strong run (April 7, 2009)	
DX-2148	RBS, Fiat - IQ was the real test (April 24, 2009)	
DX-2149	RBS, Fiat - Fiat targets FY09 profits (January 23, 2009)	
DX-2150	RBS, Fiat - Reflecting the truck downturn (March 4, 2009)	
DX-2151	RBS, Fiat - Results due 22 January (January 16, 2009)	
DX-2152	RBS, Fiat - Taking a break (April 7, 2009)	
DX-2153	RBS, Volkswagen - FY08 results review (March 18, 2009)	

Exhibit Number	Exhibit Description	Exhibit Source
DX-2154	RBS, Volkswagen - Q&A (March 17, 2009)	
DX-2155	RBS, Volkswagen - Strong performance (April 30, 2009)	
DX-2156	Societe Generale, BMW - Likely in the back (November 2, 2009)	
DX-2157	Societe Generale, BMW - Positive EBIT and strong cash position despite very low sales (August 5, 2009)	
DX-2158	Societe Generale, BMW - Quarterly results Limited loss expected for Q2 (August 3, 2009)	
DX-2159	Societe Generale, BMW - Solidity confirmed (May 6, 2009)	
DX-2160	Societe Generale, BMW - Strong positioning for either eventuality (March 26, 2009)	
DX-2161	Societe Generale, BMW - Weak Q3 showing ahead of a better Q4e performance (November 4, 2009)	
DX-2162	Societe Generale, BMW - Well positioned for either eventuality (March 26, 2009)	
DX-2163	Societe Generale, Fiat - Fly me to the moon - Chrysler's five-year plan (November 23, 2009)	
DX-2164	Societe Generale, Fiat - Once again another solid set of earnings (October 22, 2009)	
DX-2165	Societe Generale, Fiat - Strong earnings, but already fully discounted (July 22, 2009)	
DX-2166	Societe Generale, Toyota Motor Corp. - A much tougher than expected second half (January 5, 2009)	
DX-2167	Societe Generale, Volkswagen - 12m target upgrade Solid set of earnings, acceptable second half in sight (July 31, 2009)	
DX-2168	Societe Generale, Volkswagen - Analyst Meeting - Relatively comfortable on 2009, underpinning our buy rating (March 13, 2009)	
DX-2169	Societe Generale, Volkswagen - Christmas shopping who's next on the list (December 9, 2009)	
DX-2170	Societe Generale, Volkswagen - Discontinuation of Coverage (March 10, 2009)	
DX-2171	Societe Generale, Volkswagen - German Scrapping - the way to get VW flying (April 9, 2009)	
DX-2172	Societe Generale, Volkswagen - Merger with Porsche SE on track (July 23, 2009)	
DX-2173	Societe Generale, Volkswagen - Power struggle ends, VW plans full takeover of Porsche (August 28, 2009)	
DX-2174	Societe Generale, Volkswagen - Quarterly results better than expected, reiterating our buy rating (April 23, 2009)	
DX-2175	Societe Generale, Volkswagen - Quarterly results solid set of earnings expected (July 28, 2009)	
DX-2176	Societe Generale, Volkswagen - Target price reached, market likely to take profits (October 19, 2009)	
DX-2177	Societe Generale, Volkswagen - Update on VW Law (April 17, 2009)	
DX-2178	UBS, BMW - Clarity on finco strategy could be a benefit (March 9, 2009)	
DX-2179	UBS, BMW - Continued Reliance on Car Financing (February 6, 2009)	
DX-2180	UBS, BMW - Much better Q1, surprise on net cash (May 6, 2009)	
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DX-2188	UniCredit, BMW - Crisis management increases 2010 credibility (May 6, 2009)	
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DX-2198	UniCredit, Fiat - A guide to Detroit (October 21, 2009)	
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DX-2202	UniCredit, Fiat - Feedback from XII UniCredit Italian Conference (May 25, 2009)	
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DX-2224	Credit Suisse, General Motors - Hedging Gains, Strong International Operations Drive IQ08 Upside Surprise (May 1, 2008) (excerpt)	
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DX-2231	Deutsche Bank, General Motors - Key points from GM's updated viability plan (February 18, 2009) (excerpt)	
DX-2232	Deutsche Bank, March Update - SAAR Strength Continues and Pricing Improves (March 17, 2011) (excerpt)	
DX-2233	Morgan Stanley, General Motors - IQ08 Results Cash Guzzler Despite Headline Beat (May 1, 2008) (excerpt)	

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DX-2235	UBS, General Motors - Why buy now no near-term catalysts (December 15, 2010) (excerpt)	
DX-2236	AbitibiBowater, 2010 Form 10-K (excerpt)	
DX-2237	Aleris International, Form S-4 filed March 30, 2011 (excerpt)	
DX-2238	Armstrong World Industries, 2006 Form 10-K (excerpt)	
DX-2239	Chemtura Corporation, 2010 Form 10-K (excerpt)	
DX-2240	Dana Corporation, 2008 Form 10-K (excerpt)	
DX-2241	Delphi Automotive, Form S-1 filed May 25, 2011 (excerpt)	
DX-2242	Federal-Mogul Corporation, 2007 Form 10-K (excerpt)	
DX-2243	Kaiser Aluminum Corporation, 2006 Form 10-K (excerpt)	
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DX-2245	Loral Space & Communications, 2005 Form 10-K (excerpt)	
DX-2246	Lyondell Chemical Company, 2010 Form 10-K (excerpt)	
DX-2247	Owens Corning, 2006 Form 10-K (excerpt)	
DX-2248	Pilgrim's Pride Corporation, 2010 Form 10-K (excerpt)	
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DX-2251	Spanson, 2010 Form 10-K (excerpt)	
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DX-2253	USG Corp, Form 10-Q for the quarterly period ended June 30, 2006 (excerpt)	
DX-2254	Visteon Corporation, 2010 Form 10-K (excerpt)	
DX-2255	Amarillo Biosciences, 2014 Form 10-K	
DX-2256	Atrinsic, 2014 Form 10-K	
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DX-2266	WCI Communities, 2013 Form 10-K	
DX-2267	William Lyon Homes, 2012 Form 10-K	
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DX-2269	BARCLAYS, Ford Motor Company - Profit Rise Likely but Debt Load Remains (July 22, 2009)	
DX-2270	BARCLAYS, Ford Motor Company - Warranty Accrual Resets (July 24, 2009)	
DX-2271	JPMorgan Ford Motor Company - Fixing the Capital Structure (July 24, 2009)	
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DX-2274	JPMorgan, Ford Motor Company - Q209 Upside on So-so Quality (July 22, 2009)	
DX-2275	UBS, Ford Motor Company - Another Beat and Cash Flow Improvement (July 23, 2009)	
DX-2276	UBS, Ford Motor Company - Expect EPS Beat and Moderate Improvement in Cash Burn Rate (July 17, 2009)	
DX-2277	UBS, Ford Motor Company - Positive Momentum Expected to Continue (July 23, 2009)	
DX-2278	BMW Group, 2008 Annual Report (excerpt)	
DX-2279	Daimler, 2009 Annual Report (excerpt)	
DX-2280	Fiat Group, 2009 Annual Report (excerpt)	
DX-2281	Ford Motor Company, 2009 Form 10-K	
DX-2282	Honda Motor Co. financial results for quarterly period ending December 31, 2008	
DX-2283	PSA Peugeot Citroen, 2009 Annual Results	
DX-2284	Renault, 2009 Registration Document	
DX-2285	Volkswagen Group, 2009 Annual Report	
DX-2286	Volvo Group, 2009 Annual Report	
DX-2287	BMW Group Quarterly Report for June 30, 2009 (excerpt)	
DX-2288	Daimler, Interim Report Q2 2009 (excerpt)	
DX-2289	FIAT Group, 2009 Second Quarter Financial Report	
DX-2290	Ford Motor Company, Form 10-Q for the quarterly period ending June 30, 2009 (excerpt)	
DX-2291	Honda Motor Co. Financial results for quarterly period ending June 30, 2009	
DX-2292	PSA Peugeot Citroen, 2008 Interim Report	
DX-2293	PSA Peugeot Citroen, 2009 Annual Results	
DX-2294	PSA Peugeot Citroen, 2010 First Half Results	
DX-2295	Renault, 2009 First Half Earnings Report	
DX-2296	Volkswagen, Half-Yearly Financial Report January - June 2009	
DX-2297	Volvo Group, Six Months Ended June 30, 2009	
DX-2298	Defendants' April 2016 Fixture Classification List exchanged with Plaintiff's Counsel, adjusted only for changes made following inspection of 300 assets	
DX-2299	April 2016 Fixture Classification List provided by Plaintiff's Counsel	
DX-2300	Plaintiff's Updated Fixture Classifications List for the Warren and Lansing Assets Inspected	
DX-2301	Plaintiff's Updated Fixture Classifications List for Defiance Assets Inspected	

* Plaintiff reserves all rights with respect to Exhibit F, including the right to assert objections to these exhibits, as this list was provided to Plaintiff for the first time on March 31.

* Defendants advised Plaintiff when the parties first exchanged exhibit lists on March 6 that their "exhibit list includes excerpted or summary exhibits in the interest of streamlining the presentation of evidence at trial," and that "in the event plaintiff maintains an objection to any such piece of evidence, Defendants intend to supplement this preliminary list with the underlying source materials." While the parties met and conferred and resolved certain of Plaintiff's objections, Plaintiff continues to object to many of Defendants' summary exhibits. Defendants have accordingly prepared and submitted this Exhibit F and reserve all of their rights as well.