

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

**DYLAN BRANDT, *et al.*,**

**PLAINTIFFS,**

**v.**

**No. 4:21-CV-00450-JM**

**LESLIE RUTLEDGE, *et al.*,**

**DEFENDANTS.**

**DEFENDANTS' MOTION TO EXCLUDE PLAINTIFFS'  
EVIDENTIARY DEPOSITION DESIGNATIONS OF REPRESENTATIVE ROBIN LUNDSTRUM AND  
INCORPORATED BRIEF IN SUPPORT**

Defendants, through counsel, for their Motion to Exclude Plaintiffs' Evidentiary Deposition Designations of Representative Robin Lundstrum and Incorporated Brief in Support, hereby state as follows:

1. This is an action challenging Act 626 of 2021 (the "SAFE Act"). The case is set for trial commencing October 17, 2022. (*See* Amended Final Scheduling Order, Doc. 99).

2. Discovery in this matter closed on May 26, 2022. Pursuant to this Court's order, Plaintiffs conducted two depositions after the close of discovery, including the deposition of Representative Robin Lundstrum.

3. Pursuant to the parties' agreement, on July 26, 2022, Plaintiffs served Defendants with deposition designations for trial, a true and correct copy of which is attached hereto as Exhibit "A" and incorporated herein by reference.

4. In the document served upon Defendants, Plaintiffs designated portions of the testimony Rep. Robin Lundstrum, who is currently an Arkansas State Representative for the 87th District.

5. Pursuant to the parties' agreement, on August 2, 2022, Defendants made counter-designations to additional portions of Rep. Lundstrum's deposition testimony that should be read

and admitted into evidence at trial if the Court permits her to testify via deposition. Defendants' counter-designations were made subject to and without waiving any objections. A true and correct copy of Defendants' counter-designations is attached hereto as Exhibit "B" and incorporated herein by reference.

6. The parties also mutually agreed Defendants would have two weeks after receipt of Plaintiffs' deposition designations to submit their objections. Defendants now submit their objections to Plaintiffs' deposition designations of Rep. Lundstrum.

7. There is no relevant purpose for the introduction of Rep. Lundstrum's testimony, through live testimony or deposition designation. In fact, this Court has at no point determined that her testimony is relevant.

8. Only relevant evidence is admissible under the Federal Rules of Evidence. Fed. R. Evid. 402. Evidence is relevant if it has any tendency to make a fact more or less probable than it would be without the evidence, and the fact is of consequence in determining the action. Fed. R. Evid. 401(a)–(b).

9. Rep. Lundstrum, a sitting legislator, is entitled to legislative privilege from having to testify as to the actions she took in the sphere of her legislative activities, and she has briefed the issue extensively.<sup>1</sup> The privilege applies whether in a deposition or at trial. Notably, Rep. Lundstrum's deposition transcript reveals that Plaintiffs attempted to ask numerous questions as to her legislative activities, which were met with proper objections.

10. Not only did Plaintiffs seek to force Rep. Lundstrum to waive her privilege, Plaintiffs made multiple incomplete designations in violation of Rule 106, and Defendants have

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<sup>1</sup> Defendants incorporate the arguments made by Rep. Lundstrum in her Motion to Quash and for Protective Order (Doc. 119) and accompanying Brief in Support (Doc. 120) as if restated herein word for word, pursuant to Rule 10(c) of the Federal Rules of Civil Procedure.

accordingly lodged objections to the incomplete designations below. *See* Fed. R. Evid. 106. The questions posed to Rep. Lundstrum demonstrate a blatant attempt to piecemeal her testimony and extract unreliable soundbites that, even when complete, are irrelevant.

11. Plaintiffs also designated questions and answers that were intended to harass and unduly embarrass Rep. Lundstrum, in violation of Rule 610 and 611. These attempts are ultimately an attempt to illicit irrelevant testimony. The deposition designations, therefore, do not comply with Rules 401, 402, 610, and 611 and cannot fairly be presented to the Court. Examples of the improper questions include, but are not limited to:

- Whether Rep. Lundstrum believes “gay and lesbian people can through therapy come to live heterosexual lives” (Rep. Lundstrum Depo. 246:8–246:13);
- Whether Rep. Lundstrum believes “it is necessary to stand up for Biblical principles” (Rep. Lundstrum Depo. 74:6–74:10);
- Rep. Lundstrum’s comments on a corporation or its owners that has no bearing on this litigation (Rep. Lundstrum Depo. 229:1–230:18);
- Vague and overbroad questions regarding whether Rep. Lundstrum has had “discussions with other members of the Arkansas General Assembly,” despite Rep. Lundstrum testifying that she has had a “variety of discussions,” and they “talk about a variety of different things” (Rep. Lundstrum Depo. 203:11–208:6);
- Rep. Lundstrum’s views on the separation of church and state (Rep. Lundstrum Depo. 79:18–80:10); and
- Whether Rep. Lundstrum would “have a religious objection to gender transition regardless of ‘what the research showed?’” (Rep. Lundstrum Depo. 242:25–243:18).

12. As noted previously in Defendants' Motion in *Limine* (Doc. 164), testimony regarding a witness's personal beliefs, including their religious views, is inadmissible evidence under Rule 610 of the Federal Rules of Evidence. Plaintiffs cannot meet the narrow exception to this rule. These questions are meant solely to harass and unduly embarrass Rep. Lundstrum.

13. Because Plaintiffs cannot present any Rule of Evidence under which Rep. Lundstrum's testimony is admissible, this Court should exclude her testimony in its entirety.

14. To the extent this Court determines that any testimony on the part of Rep. Lundstrum is admissible, Defendants respectfully move this Court to exclude certain portions of Plaintiffs' deposition designations. In the chart below, Defendants set forth their objections to the use of certain portions of Rep. Lundstrum's deposition testimony. Defendants have provided the specific objection and legal basis supporting exclusion. In the event the designations are permitted and presented at trial, Defendants ask that the testimony be limited pursuant to the following objections:

Page Start	Line Start	Page End	Line End	Objection
18	13	18	16	No objection.
22	19	22	22	Object to lines 22:19–22:22 as to relevance under Rules 401 and 402.  Object to lines 22:19–22:22 due to designating incomplete testimony under Rule 106.
23	1	23	17	Object to lines 23:1–23:17 as to relevance under Rules 401 and 402.  Object to lines 23:1–23:17 due to designating incomplete testimony under Rule 106.
25	19	26	9	Object to lines 25:19–26:9 as to relevance under Rules 401 and 402.

Page Start	Line Start	Page End	Line End	Objection
				Object to lines 25:19–26:9 due to designating incomplete testimony under Rule 106.
27	10	27	15	Object to lines 27:10–27:15 as to relevance under Rules 401 and 402.  Object to lines 27:10–27:15 due to designating incomplete testimony under Rule 106.
28	15	29	5	Object to lines 28:15–29:5 as to relevance under Rules 401 and 402.  Object to lines 28:15–29:5 due to designating incomplete testimony under Rule 106.  Object to lines 28:15–29:5 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.
30	10	32	5	Object to lines 30:10–32:5 as to relevance under Rules 401 and 402.  Object to lines 30:10–32:5 due to designating incomplete testimony under Rule 106.
32	21	32	24	Object to lines 31:21–32:24 as to relevance under Rules 401 and 402.  Object to lines 31:21–32:24 due to designating incomplete testimony under Rule 106.
33	8	33	14	Object to lines 33:8–33:14 as to relevance under Rules 401 and 402.  Object to lines 33:8–33:14 due to designating incomplete testimony under Rule 106.
33	20	33	22	Object to lines 33:20–33:22 as to relevance under Rules 401 and 402.  Object to lines 33:20–33:22 due to calling for speculation under Rule 602.

Page Start	Line Start	Page End	Line End	Objection
33	24	34	4	<p>Object to lines 33:24–34:4 as to relevance under Rules 401 and 402.</p> <p>Object to lines 33:24–34:4 due to calling for speculation under Rule 602.</p>
46	7	47	4	<p>Object to lines 46:7–47:4 as to relevance under Rules 401 and 402.</p> <p>Object to lines 46:7–47:4 due to calling for speculation under Rule 602.</p> <p>Object to lines 46:7–47:4 due to designating incomplete testimony under Rule 106.</p>
48	21	48	24	<p>Object to lines 48:21–48:24 as to relevance under Rules 401 and 402.</p> <p>Object to lines 48:21–48:24 due to designating incomplete testimony under Rule 106.</p>
49	5	49	15	<p>Object to lines 49:5–49:15 as to relevance under Rules 401 and 402.</p> <p>Object to lines 49:5–49:15 due to calling for speculation under Rule 602.</p> <p>Object to lines 49:5–49:15 due to designating incomplete testimony under Rule 106.</p>
49	20	49	22	<p>Object to lines 49:20–49:22 as to relevance under Rules 401 and 402.</p> <p>Object to lines 49:20–49:22 due to calling for speculation under Rule 602.</p> <p>Object to lines 49:20–49:22 due to designating incomplete testimony under Rule 106.</p>
50	9	50	10	<p>Object to lines 50:9–50:10 as to relevance under Rules 401 and 402.</p> <p>Object to lines 50:9–50:10 due to calling for speculation under Rule 602.</p>

Page Start	Line Start	Page End	Line End	Objection
				Object to lines 50:9–50:10 due to designating incomplete testimony under Rule 106.
50	16	50	20	Object to lines 50:16–50:20 as to relevance under Rules 401 and 402.  Object to lines 50:16–50:20 due to calling for speculation under Rule 602.  Object to lines 50:16–50:20 due to designating incomplete testimony under Rule 106.
50	23	51	4	Object to lines 50:23–51:4 as to relevance under Rules 401 and 402.  Object to lines 50:23–51:4 due to designating incomplete testimony under Rule 106.
51	15	51	23	Object to lines 51:15–51:23 as to relevance under Rules 401 and 402.  Object to lines 51:15–51:23 due to designating incomplete testimony under Rule 106.
52	5	52	17	Object to lines 52:5–52:17 as to relevance under Rules 401 and 402.
53	5	53	9	Object to lines 53:5–53:9 as to relevance under Rules 401 and 402.  Object to lines 53:5–53:9 due to designating incomplete testimony under Rule 106.
60	18	60	21	Object to lines 60:18–60:21 as to relevance under Rules 401 and 402.  Object to lines 60:18–60:21 due to designating incomplete testimony under Rule 106.
62	13	63	10	Object to lines 62:13–63:10 as to relevance under Rules 401 and 402.

Page Start	Line Start	Page End	Line End	Objection
				Object to lines 62:13–63:10 due to calling for speculation under Rule 602.  Object to lines 62:13–63:10 due to designating incomplete testimony under Rule 106.
64	7	64	15	Object to lines 64:7–64:15 as to relevance under Rules 401 and 402.
65	11	65	14	Object to lines 65:11–65:14 as to relevance under Rules 401 and 402.
67	12	67	16	Object to lines 67:12–67:16 as to relevance under Rules 401 and 402.  Object to lines 67:12–67:16 due to designating incomplete testimony under Rule 106.
67	22	68	3	Object to lines 67:22–68:3 as to relevance under Rules 401 and 402.  Object to lines 67:22–68:3 due to designating incomplete testimony under Rule 106.
68	19	68	24	Object to lines 68:19–68:24 as to relevance under Rules 401 and 402.  Object to lines 68:19–68:24 due to designating incomplete testimony under Rule 106.
70	8	70	14	Object to lines 70:8–70:14 as to relevance under Rules 401 and 402.  Object to lines 70:8–70:14 due to calling for speculation under Rule 602.  Object to lines 70:8–70:14 due to designating incomplete testimony under Rule 106.
71	2	71	8	Object to lines 71:2–71:8 as to relevance under Rules 401 and 402.  Object to lines 71:2–71:8 due to designating incomplete testimony under Rule 106.

Page Start	Line Start	Page End	Line End	Objection
73	13	73	21	<p>Object to lines 73:13–73:21 as to relevance under Rules 401 and 402.</p> <p>Object to lines 73:13–73:21 due to designating incomplete testimony under Rule 106.</p> <p>Object to lines 73:13–73:21 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.</p>
74	6	74	10	<p>Object to lines 74:6–74:10 as to relevance under Rules 401 and 402.</p> <p>Object to lines 74:6–74:10 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.</p>
74	16	74	25	<p>Object to lines 74:16–74:25 as to relevance under Rules 401 and 402.</p> <p>Object to lines 74:16–74:25 due to calling for speculation under Rule 602.</p> <p>Object to lines 74:16–74:25 due to designating incomplete testimony under Rule 106.</p>
76	18	77	22	<p>Object to lines 76:18–77:22 as to relevance under Rules 401 and 402.</p> <p>Object to lines 76:18–77:22 due to designating incomplete testimony under Rule 106.</p>
78	8	78	12	<p>Object to lines 78:8–78:12 as to relevance under Rules 401 and 402.</p>
79	18	79	18	<p>Object to lines 79:18–79:18 as to relevance under Rules 401 and 402.</p> <p>Object to lines 79:18–79:18 due to designating incomplete testimony under Rule 106.</p>

Page Start	Line Start	Page End	Line End	Objection
				Object to lines 79:18–79:18 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.
80	5	80	10	Object to lines 80:5–80:10 as to relevance under Rules 401 and 402.  Object to lines 80:5–80:10 due to designating incomplete testimony under Rule 106.  Object to lines 80:5–80:10 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.
97	2	97	10	Object to lines 97:2–97:10 as to relevance under Rules 401 and 402.  Object to lines 97:2–97:10 due to designating incomplete testimony under Rule 106.
98	3	99	24	Object to lines 98:3–99:24 as to relevance under Rules 401 and 402.  Object to lines 98:3–99:24 due to designating incomplete testimony under Rule 106.
107	11	107	18	Object to lines 107:11–107:18 as to relevance under Rules 401 and 402.  Object to lines 107:11–107:18 due to calling for speculation under Rule 602.  Object to lines 107:11–107:18 due to designating incomplete testimony under Rule 106.
108	1	108	4	Object to lines 108:1–108:4 as to relevance under Rules 401 and 402.
108	8	109	14	Object to lines 108:8–109:14 as to relevance under Rules 401 and 402.
116	17	116	22	Object to lines 116:17–116:22 as to relevance under Rules 401 and 402.

Page Start	Line Start	Page End	Line End	Objection
				Object to lines 116:17–116:22 due to designating incomplete testimony under Rule 106.
118	24	119	1	Object to lines 118:24–119:1 as to relevance under Rules 401 and 402.  Object to lines 118:24–119:1 due to designating incomplete testimony under Rule 106.
119	10	119	23	Object to lines 119:10–119:23 as to relevance under Rules 401 and 402.  Object to lines 119:10–119:23 due to calling for speculation under Rule 602.  Object to lines 119:10–119:23 due to designating incomplete testimony under Rule 106.
120	3	120	23	Object to lines 120:3–120:23 as to relevance under Rules 401 and 402.
122	25	123	3	Object to lines 122:25–123:3 as to relevance under Rules 401 and 402.  Object to lines 122:25–123:3 due to calling for speculation under Rule 602.
133	11	134	1	Object to lines 133:11–134:1 as to relevance under Rules 401 and 402.  Object to lines 133:11–134:1 due to calling for speculation under Rule 602.  Object to lines 133:11–134:1 due to designating incomplete testimony under Rule 106.
135	24	137	16	Object to lines 135:24–137:16 as to relevance under Rules 401 and 402.  Object to lines 135:24–137:16 due to calling for speculation under Rule 602.

Page Start	Line Start	Page End	Line End	Objection
138	7	138	16	Object to lines 138:7–138:16 as to relevance under Rules 401 and 402.  Object to lines 138:7–138:16 due to calling for speculation under Rule 602.
139	21	140	22	Object to lines 139:21–140:22 as to relevance under Rules 401 and 402.
141	5	141	12	Object to lines 141:5–141:12 as to relevance under Rules 401 and 402.
141	21	142	2	Object to lines 141:21–142:2 as to relevance under Rules 401 and 402.
142	14	142	18	Object to lines 142:14–142:18 as to relevance under Rules 401 and 402.  Object to lines 142:14–142:18 due to calling for speculation under Rule 602.  Object to lines 142:14–142:18 due to designating incomplete testimony under Rule 106.
143	20	143	23	Object to lines 143:20–143:23 as to relevance under Rules 401 and 402.  Object to lines 143:20–143:23 due to calling for speculation under Rule 602.
143	24	144	2	Object to lines 143:24–144:2 as to relevance under Rules 401 and 402.  Object to lines 143:24–144:2 due to calling for speculation under Rule 602.
144	7	144	25	Object to lines 144:7–144:25 as to relevance under Rules 401 and 402.  Object to lines 144:7–144:25 due to calling for speculation under Rule 602.
145	4	145	5	Object to lines 145:4–145:5 as to relevance under Rules 401 and 402.

Page Start	Line Start	Page End	Line End	Objection
145	6	145	7	Object to lines 145:6–145:7 as to relevance under Rules 401 and 402.
146	4	148	8	Object to lines 146:4–148:8 as to relevance under Rules 401 and 402.  Object to lines 146:4–148:8 due to calling for speculation under Rule 602.  Object to lines 146:4–148:8 due to designating incomplete testimony under Rule 106.
148	12	148	18	Object to lines 148:12–148:18 as to relevance under Rules 401 and 402.  Object to lines 148:12–148:18 due to designating incomplete testimony under Rule 106.
149	23	151	3	Object to lines 149:23–151:3 as to relevance under Rules 401 and 402.
154	11	154	25	Object to lines 154:11–154:25 as to relevance under Rules 401 and 402.  Object to lines 154:11–154:25 due to calling for speculation under Rule 602.  Object to lines 154:11–154:25 due to designating incomplete testimony under Rule 106.
156	4	158	9	Object to lines 156:4–158:9 as to relevance under Rules 401 and 402.  Object to lines 156:4–158:9 due to calling for speculation under Rule 602.  Object to lines 156:4–158:9 due to designating incomplete testimony under Rule 106.
175	19	175	22	Object to lines 175:19–175:22 as to relevance under Rules 401 and 402.

Page Start	Line Start	Page End	Line End	Objection
				Object to lines 175:19–175:22 due to designating incomplete testimony under Rule 106.
176	12	176	23	Object to lines 176:12–176:23 as to relevance under Rules 401 and 402.  Object to lines 176:12–176:23 due to calling for speculation under Rule 602.  Object to lines 176:12–176:23 due to designating incomplete testimony under Rule 106.
177	18	177	24	Object to lines 177:18–177:24 as to relevance under Rules 401 and 402.  Object to lines 177:18–177:24 due to calling for speculation under Rule 602.  Object to lines 177:18–177:24 due to designating incomplete testimony under Rule 106.
178	2	178	13	Object to lines 178:2–178:13 as to relevance under Rules 401 and 402.  Object to lines 178:2–178:13 due to calling for speculation under Rule 602.  Object to lines 178:2–178:13 due to designating incomplete testimony under Rule 106.
180	11	180	22	Object to lines 180:11–180:22 as to relevance under Rules 401 and 402.  Object to lines 180:11–180:22 due to designating incomplete testimony under Rule 106.
190	6	190	10	Object to lines 190:6–190:10 as to relevance under Rules 401 and 402.  Object to lines 190:6–190:10 due to designating incomplete testimony under Rule 106.
190	21	191	6	Object to lines 190:21–191:6 as to relevance under Rules 401 and 402.

Page Start	Line Start	Page End	Line End	Objection
				<p>Object to lines 190:21–191:6 due to designating incomplete testimony under Rule 106.</p> <p>Object to lines 190:21–191:6 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.</p>
203	11	208	6	<p>Object to lines 203:11–208:6 as to relevance under Rules 401 and 402.</p> <p>Object to lines 203:11–208:6 due to calling for speculation under Rule 602.</p> <p>Object to lines 203:11–208:6 due to designating incomplete testimony under Rule 106.</p> <p>Object to lines 203:11–208:6 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.</p> <p>Object to lines 203:11–208:6 based on inadmissible hearsay.</p>
209	3	209	13	<p>Object to lines 209:3–209:13 as to relevance under Rules 401 and 402.</p> <p>Object to lines 209:3–209:13 due to designating incomplete testimony under Rule 106.</p>
210	9	210	19	<p>Object to lines 210:9–210:19 as to relevance under Rules 401 and 402.</p> <p>Object to lines 210:9–210:19 due to designating incomplete testimony under Rule 106.</p> <p>Object to lines 210:9–210:19 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.</p>
211	5	211	7	<p>Object to lines 211:5–211:7 as to relevance under Rules 401 and 402.</p> <p>Object to lines 211:5–211:7 due to designating incomplete testimony under Rule 106.</p>

Page Start	Line Start	Page End	Line End	Objection
				Object to lines 211:5–211:7 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.
211	13	211	24	Object to lines 211:13–211:24 as to relevance under Rules 401 and 402.  Object to lines 211:13–211:24 due to designating incomplete testimony under Rule 106.  Object to lines 211:13–211:24 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.
212	7	212	14	Object to lines 212:7–212:14 as to relevance under Rules 401 and 402.  Object to lines 212:7–212:14 due to calling for speculation under Rule 602.  Object to lines 212:7–212:14 due to designating incomplete testimony under Rule 106.
214	2	214	8	Object to lines 214:2–214:8 as to relevance under Rules 401 and 402.  Object to lines 214:2–214:8 due to designating incomplete testimony under Rule 106.
214	9	214	9	Object to lines 214:9–214:9 as to relevance under Rules 401 and 402.
214	13	216	10	Object to lines 214:13–216:10 as to relevance under Rules 401 and 402.  Object to lines 214:13–216:10 due to calling for speculation under Rule 602.  Object to lines 214:13–216:10 due to designating incomplete testimony under Rule 106.

Page Start	Line Start	Page End	Line End	Objection
				Object to lines 214:13–216:10 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.
217	14	217	17	Object to lines 217:14–217:17 as to relevance under Rules 401 and 402.
224	24	225	19	Object to lines 224:24–225:19 as to relevance under Rules 401 and 402.  Object to lines 224:24–225:19 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.
228	6	228	22	Object to lines 228:6–228:22 as to relevance under Rules 401 and 402.  Object to lines 228:6–228:22 due to designating incomplete testimony under Rule 106.
229	1	230	18	Object to lines 229:1–230:18 as to relevance under Rules 401 and 402.  Object to lines 229:1–230:18 due to designating incomplete testimony under Rule 106.  Object to lines 229:1–230:18 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.
230	24	231	25	Object to lines 230:24–231:25 as to relevance under Rules 401 and 402.  Object to lines 230:24–231:25 due to designating incomplete testimony under Rule 106.  Object to lines 230:24–231:25 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.
232	25	233	6	Object to lines 232:25–233:6 as to relevance under Rules 401 and 402.

Page Start	Line Start	Page End	Line End	Objection
				Object to lines 232:25–233:6 due to designating incomplete testimony under Rule 106.
233	25	234	13	Object to lines 233:25–234:13 as to relevance under Rules 401 and 402.  Object to lines 233:25–234:13 due to designating incomplete testimony under Rule 106.
242	25	243	18	Object to lines 242:25–243:18 as to relevance under Rules 401 and 402.  Object to lines 242:25–243:18 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.
246	8	246	13	Object to lines 246:8–246:13 as to relevance under Rules 401 and 402.  Object to lines 246:8–246:13 pursuant to Rule 611 to protect witness from harassment, and outside the scope of Rule 610.
253	25	254	1	Object to lines 253:25–254:1 as to relevance under Rules 401 and 402.

WHEREFORE, Defendants respectfully request that this Court exclude Representative Lundstrum’s testimony because it is irrelevant. If the Court determines her testimony is somehow appropriate for trial, this Court should issue an order excluding the use of any testimony that is inadmissible.

Respectfully Submitted,

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51:15	51:23	
52:5	52:17	
53:5	53:9	9
60:18 "Is ..."	60:21	
62:13	63:10	
64:7	64:15	
65:11	65:14	
67:12	67:16	
67:22	68:3	
68:19	68:24	11
70:8	70:14	11
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178:2	178:13 "...all."	42
180:11	180:22 ("...wrong.")	
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233:25 "do..."	234:13:7	
242:25	243:18	
246:8	246:13	
253:25	254:1	

Dated: July 26, 2022

/s/ Leslie Cooper

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**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
CENTRAL DIVISION**

**DYLAN BRANDT, *et al.*,**

**PLAINTIFFS,**

**v.**

**No. 4:21-CV-00450-JM**

**LESLIE RUTLEDGE, *et al.*,**

**DEFENDANTS.**

**DEFENDANTS' DEPOSITION DESIGNATIONS**

Defendants, through counsel, pursuant to Local Rule 26.2, submit the following Deposition

Designations:

Representative Robin Lundstrum

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Dated: August 2, 2022

Respectfully Submitted,

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