

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

ASHLEY DIAMOND,

Plaintiff,

v.

TIMOTHY WARD *et. al.*,

Defendants.

No. 5:20-cv-00453-MTT

PLAINTIFF’S PAGE AND LINE DEPOSITION DESIGNATIONS

Pursuant to this Court’s Order (ECF 169), Plaintiff, by counsel, respectfully submits Plaintiff’s Page and Line Deposition Designations.

June 30, 2022 Deposition of Will Ausborn

<i>Plaintiff’s Designations – Ausborn</i>				
Start Page	Start Line	End Page	End Line	Page:Line Range
7	8	7	13	7:8 - 7:13
12	19	13	13	12:19 - 13:13
14	4	14	7	14:4 - 14:7
14	21	14	24	14:21 - 14:24
22	21	23	13	22:21 - 23:13
23	18	24	14	23:18 - 24:14
24	25	25	10	24:25 - 25:10
25	14	25	20	25:14 - 25:20
26	17	26	23	26:17 - 26:23
28	9	28	12	28:9 - 28:12
37	14	38	1	37:14 - 38:1
41	4	41	14	41:4 - 41:14
42	12	42	19	42:12 - 42:19
42	20	42	25	42:20 - 42:25
43	6	43	10	43:6 - 43:10
43	16	43	20	43:16 - 43:20

<i>Plaintiff's Designations – Ausborn</i>				
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45	15	45	19	45:15 - 45:19
46	12	47	5	46:12 - 47:5
47	8	47	16	47:8 - 47:16
48	7	48	9	48:7 - 48:9
48	16	48	18	48:16 - 48:18
48	25	49	3	48:25 - 49:3
49	8	49	13	49:8 - 49:13
49	19	49	22	49:19 - 49:22
50	2	50	3	50:2 - 50:3
50	8	50	16	50:8 - 50:16
50	19	51	3	50:19 - 51:3
51	7	51	22	51:7 - 51:22
51	23	53	14	51:23 - 53:14
53	23	56	1	53:23 - 56:1
56	2	56	9	56:2 - 56:9
56	13	56	22	56:13 - 56:22
57	11	57	15	57:11 - 57:15
62	11	62	12	62:11 - 62:12
62	15	62	20	62:15 - 62:20
62	23	63	22	62:23 - 63:22
64	17	65	15	64:17 - 65:15
65	18	65	23	65:18 - 65:23
66	6	66	11	66:6 - 66:11
66	14	66	20	66:14 - 66:20
66	21	67	16	66:21 - 67:16
69	10	70	2	69:10 - 70:2
70	16	70	21	70:16 - 70:21
71	11	71	21	71:11 - 71:21
72	8	72	10	72:8 - 72:10
73	4	73	20	73:4 - 73:20
76	3	76	22	76:3 - 76:22
79	19	79	24	79:19 - 79:24
80	4	80	9	80:4 - 80:9
80	12	81	9	80:12 - 81:9
81	11	81	20	81:11 - 81:20
82	2	82	11	82:2 - 82:11
83	4	84	6	83:4 - 84:6
84	7	84	10	84:7 - 84:10
84	14	85	4	84:14 - 85:4
86	22	87	11	86:22 - 87:11
91	1	91	21	91:1 - 91:21
105	3	105	14	105:3 - 105:14
109	1	109	12	109:1 - 109:12

<i>Plaintiff's Designations – Ausborn</i>				
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110	21	110	23	110:21 - 110:23

<i>Exhibit Authentication Designations – Ausborn</i>						
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49	19	49	22	49:19 - 49:22	1	P-281
50	7	50	25	50:7 - 50:25	1	P-281
62	7	63	4	62:7 - 63:4	3	P-282
65	18	65	20	65:18 - 65:20	4	P-283
66	6	66	20	66:6 - 66:20	4	P-283
77	25	78	4	77:25 - 78:4	4	P-283
79	19	79	21	79:19 - 79:21	7	P-284
80	4	80	18	80:4 - 80:18	7	P-284
97	5	97	9	97:5 - 97:9	8	P-285
98	2	98	4	98:2 - 98:4	8	P-285
98	11	98	12	98:11 - 98:12	8	P-285

May 10, 2021 Deposition of Tamara Cantera

<i>Plaintiff's Designations – Cantera</i>				
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9	16	9	20	9:16 - 9:20
14	18	14	22	14:18 - 14:22
14	23	15	5	14:23 - 15:5
15	22	15	24	15:22 - 15:24
16	3	16	11	16:3 - 16:11
16	14	16	22	16:14 - 16:22
16	23	16	23	16:23 - 16:23
17	1	18	5	17:1 - 18:5
19	25	20	7	19:25 - 20:7
21	10	21	14	21:10 - 21:14
22	12	22	15	22:12 - 22:15
23	11	24	25	23:11 - 24:25
25	5	25	9	25:5 - 25:9
25	14	26	23	25:14 - 26:23
27	3	27	6	27:3 - 27:6
27	15	28	9	27:15 - 28:9
28	13	29	3	28:13 - 29:3
29	4	29	18	29:4 - 29:18
29	19	30	7	29:19 - 30:7
30	11	30	21	30:11 - 30:21
32	8	32	24	32:8 - 32:24

<i>Plaintiff's Designations – Cantera</i>				
Start Page	Start Line	End Page	End Line	Page:Line Range
37	4	37	15	37:4 - 37:15
37	15	37	15	37:15 - 37:15
39	4	39	13	39:4 - 39:13
42	9	42	19	42:9 - 42:19
45	9	45	22	45:9 - 45:22
46	4	46	11	46:4 - 46:11
47	2	47	5	47:2 - 47:5
51	8	52	19	51:8 - 52:19
54	23	55	1	54:23 - 55:1
55	8	55	19	55:8 - 55:19
59	12	59	24	59:12 - 59:24
60	9	60	12	60:9 - 60:12
61	14	62	9	61:14 - 62:9
67	10	68	5	67:10 - 68:5
76	24	77	7	76:24 - 77:7
77	18	77	23	77:18 - 77:23
78	2	78	3	78:2 - 78:3
79	5	79	17	79:5 - 79:17
83	7	83	17	83:7 - 83:17
85	2	85	13	85:2 - 85:13
86	25	87	8	86:25 - 87:8
95	7	95	12	95:7 - 95:12
96	2	96	7	96:2 - 96:7
103	21	104	9	103:21 - 104:9
104	21	105	2	104:21 - 105:2
107	4	107	5	107:4 - 107:5
107	10	107	17	107:10 - 107:17
111	18	113	5	111:18 - 113:5
113	13	113	16	113:13 - 113:16
113	25	114	5	113:25 - 114:5
120	6	120	15	120:6 - 120:15
121	1	121	10	121:1 - 121:10
125	6	125	25	125:6 - 125:25
126	1	126	9	126:1 - 126:9
126	10	126	20	126:10 - 126:20
126	21	127	9	126:21 - 127:9

<i>Exhibit Authentication Designations – Cantera</i>						
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40	11	40	15	40:11 - 40:15	1	P-293
41	4	41	4	41:4 - 41:4	1	P-293

<i>Exhibit Authentication Designations – Cantera</i>						
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41	13	41	15	41:13 - 41:15	1	P-293
42	3	42	4	42:3 - 42:4	1	P-293
42	9	42	19	42:9 - 42:19	1	P-293
50	24	50	25	50:24 - 50:25	2	P-294
51	8	51	9	51:8 - 51:9	2	P-294
51	16	52	2	51:16 - 52:2	2	P-294
61	3	61	18	61:3 - 61:18	3	P-295
103	21	103	23	103:21 - 103:23	P10, D4	P-296
103	25	104	5	103:25 - 104:5	P10, D4	P-296
107	4	107	5	107:4 - 107:5	P11, D5	P-297
107	10	107	12	107:10 - 107:12	P11, D5	P-297
111	25	112	4	111:25 - 112:4	P13, D7	P-298
120	9	120	15	120:9 - 120:15	P17, D11	P-299

<i>Contingent Designations¹ – Cantara</i>				
Start Page	Start Line	End Page	End Line	Page:Line Range
57	18	58	10	57:18 - 58:10

May 11, 2021 Deposition of Daniel Fass

<i>Plaintiff's Designations – Fass</i>				
Start Page	Start Line	End Page	End Line	Page:Line Range
6	16	6	22	6:16 - 6:22
8	25	9	6	8:25 - 9:6
15	6	15	13	15:6 - 15:13
17	11	17	25	17:11 - 17:25
18	7	18	14	18:7 - 18:14
18	15	19	8	18:15 - 19:8
19	9	20	3	19:9 - 20:3
22	14	23	1	22:14 - 23:1
23	2	23	19	23:2 - 23:19
23	22	23	24	23:22 - 23:24
24	11	24	14	24:11 - 24:14
24	24	25	7	24:24 - 25:7
28	8	29	23	28:8 - 29:23
31	3	32	3	31:3 - 32:3
32	22	33	19	32:22 - 33:19
34	9	35	8	34:9 - 35:8

¹ Plaintiff reserves the right to withdraw Contingent Designations subject to the Court's ruling on her Motion in Limine.

<i>Plaintiff's Designations – Fass</i>				
Start Page	Start Line	End Page	End Line	Page:Line Range
35	9	37	2	35:9 - 37:2
37	15	37	21	37:15 - 37:21
38	3	38	6	38:3 - 38:6
39	15	39	20	39:15 - 39:20
44	19	45	7	44:19 - 45:7
53	18	54	15	53:18 - 54:15
56	15	56	19	56:15 - 56:19
56	24	57	2	56:24 - 57:2
61	9	61	11	61:9 - 61:11
61	18	61	19	61:18 - 61:19
61	24	62	4	61:24 - 62:4
62	8	62	13	62:8 - 62:13
62	16	62	23	62:16 - 62:23
63	16	64	1	63:16 - 64:1
64	12	64	15	64:12 - 64:15
66	15	66	20	66:15 - 66:20
67	16	67	22	67:16 - 67:22
83	14	83	17	83:14 - 83:17
83	21	83	25	83:21 - 83:25
84	15	85	3	84:15 - 85:3

<i>Exhibit Authentication Designations – Fass</i>						
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20	18	20	20	20:18 - 20:20	1	P-300
20	25	21	6	20:25 - 21:6	1	P-300
51	11	51	13	51:11 - 51:13	2	P-301
51	16	51	18	51:16 - 51:18	2	P-301
51	20	51	21	51:20 - 51:21	2	P-301

<i>Contingent Designations – Fass</i>				
Start Page	Start Line	End Page	End Line	Page:Line Range
20	4	20	6	20:4 - 20:6
50	14	51	9	50:14 - 51:9
51	10	53	15	51:10 - 53:15

May 10, 2021 Deposition of Tia Fletcher

<i>Plaintiff's Designations – Fletcher</i>				
Start Page	Start Line	End Page	End Line	Page:Line Range
15	8	15	21	15:8 - 15:21
15	22	16	8	15:22 - 16:8

<i>Plaintiff's Designations – Fletcher</i>				
Start Page	Start Line	End Page	End Line	Page:Line Range
16	9	16	22	16:9 - 16:22
17	9	17	12	17:9 - 17:12
18	3	18	8	18:3 - 18:8
18	9	18	14	18:9 - 18:14
19	7	19	10	19:7 - 19:10
19	7	19	8	19:7 - 19:8
22	17	22	22	22:17 - 22:22
23	3	23	14	23:3 - 23:14
23	15	23	25	23:15 - 23:25
24	1	24	10	24:1 - 24:10
24	18	25	9	24:18 - 25:9
25	17	26	6	25:17 - 26:6
26	7	26	22	26:7 - 26:22
26	23	27	18	26:23 - 27:18
27	19	27	25	27:19 - 27:25
30	22	34	8	30:22 - 34:8
34	10	35	7	34:10 - 35:7
35	23	36	4	35:23 - 36:4
36	5	36	23	36:5 - 36:23
38	20	39	16	38:20 - 39:16
43	7	44	13	43:7 - 44:13
44	14	45	6	44:14 - 45:6
45	3	45	6	45:3 - 45:6
46	1	46	6	46:1 - 46:6
47	12	48	4	47:12 - 48:4
48	5	48	16	48:5 - 48:16
55	6	55	21	55:6 - 55:21
55	22	57	6	55:22 - 57:6
71	9	71	11	71:9 - 71:11
74	18	74	20	74:18 - 74:20
95	7	97	7	95:7 - 97:7
97	8	97	22	97:8 - 97:22
97	23	99	12	97:23 - 99:12
104	6	105	7	104:6 - 105:7
123	2	123	17	123:2 - 123:17
125	3	126	7	125:3 - 126:7
138	21	139	8	138:21 - 139:8

<i>Contingent Designations – Fletcher</i>				
Start Page	Start Line	End Page	End Line	Page:Line Range
25	10	25	16	25:10 - 25:16
52	7	52	22	52:7 - 52:22
53	12	53	14	53:12 - 53:14
99	13	102	4	99:13 - 102:4
102	5	103	21	102:5 - 103:21

February 25, 2022 Deposition of Porshe Moody

<i>Plaintiff's Designations – Moody</i>				
Start Page	Start Line	End Page	End Line	Page:Line Range
5	1	5	3	5:1 - 5:3
5	4	5	7	5:4 - 5:7
13	4	13	16	13:4 - 13:16
14	11	14	16	14:11 - 14:16
15	4	15	19	15:4 - 15:19
19	11	19	17	19:11 - 19:17
26	9	26	12	26:9 - 26:12
53	2	53	17	53:2 - 53:17
53	24	54	7	53:24 - 54:7
54	8	55	2	54:8 - 55:2
82	3	82	6	82:3 - 82:6
82	8	82	15	82:8 - 82:15
86	13	87	3	86:13 - 87:3
87	4	87	16	87:4 - 87:16
87	24	88	6	87:24 - 88:6

February 24, 2022 Deposition of Gerilyn Pepin

<i>Plaintiff's Designations – Pepin</i>				
Start Page	Start Line	End Page	End Line	Page:Line Range
24	13	24	16	24:13 - 24:16
25	1	25	21	25:1 - 25:21
25	22	25	24	25:22 - 25:24
25	25	26	16	25:25 - 26:16
27	12	27	21	27:12 - 27:21
40	3	40	9	40:3 - 40:9
41	5	41	12	41:5 - 41:12
41	15	41	20	41:15 - 41:20
42	13	42	15	42:13 - 42:15
42	16	42	20	42:16 - 42:20
43	1	43	3	43:1 - 43:3
44	9	44	16	44:9 - 44:16
44	17	44	25	44:17 - 44:25
45	3	45	10	45:3 - 45:10
54	11	54	17	54:11 - 54:17
55	3	55	5	55:3 - 55:5
57	13	57	23	57:13 - 57:23
58	4	58	6	58:4 - 58:6
60	3	60	9	60:3 - 60:9
60	10	60	18	60:10 - 60:18

<i>Plaintiff's Designations – Pepin</i>				
Start Page	Start Line	End Page	End Line	Page:Line Range
62	2	62	4	62:2 - 62:4
62	5	62	14	62:5 - 62:14
63	16	63	18	63:16 - 63:18
63	24	64	2	63:24 - 64:2
64	21	64	25	64:21 - 64:25
70	12	70	16	70:12 - 70:16
70	17	70	25	70:17 - 70:25
75	14	75	18	75:14 - 75:18
112	20	113	4	112:20 - 113:4

<i>Exhibit Authentication Designations – Pepin</i>						
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47	4	47	4	47:4 - 47:4	3	P-306
47	16	47	21	47:16 - 47:21	3	P-306
48	3	48	9	48:3 - 48:9	3	P-306

February 11, 2021 Deposition of David Roth

<i>Plaintiff's Designations – Roth</i>				
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6	4	6	9	6:4 - 6:9
9	22	9	25	9:22 - 9:25
22	9	22	21	22:9 - 22:21
26	7	26	16	26:7 - 26:16
28	11	29	3	28:11 - 29:3
29	4	29	10	29:4 - 29:10
30	3	30	24	30:3 - 30:24
32	11	33	11	32:11 - 33:11
40	23	41	2	40:23 - 41:2
41	15	41	24	41:15 - 41:24
43	11	43	17	43:11 - 43:17
44	10	44	25	44:10 - 44:25
45	1	45	23	45:1 - 45:23
46	6	47	4	46:6 - 47:4
47	8	47	19	47:8 - 47:19
74	12	75	1	74:12 - 75:1
76	16	77	5	76:16 - 77:5
77	16	78	1	77:16 - 78:1
79	8	79	10	79:8 - 79:10

<i>Plaintiff's Designations – Roth</i>				
Start Page	Start Line	End Page	End Line	Page:Line Range
79	18	79	19	79:18 - 79:19
80	4	80	8	80:4 - 80:8
80	11	81	11	80:11 - 81:11
81	24	82	14	81:24 - 82:14
82	19	82	24	82:19 - 82:24
83	2	83	22	83:2 - 83:22
116	21	117	9	116:21 - 117:9
118	12	119	13	118:12 - 119:13
120	12	120	20	120:12 - 120:20
121	16	122	2	121:16 - 122:2
142	12	143	1	142:12 - 143:1
147	5	147	11	147:5 - 147:11

<i>Exhibit Authentication Designations – Roth</i>						
Start Page	Start Line	End Page	End Line	Page:Line Range	Depo. Exhibit Number	Trial Exhibit Number
45	4	45	5	45:4 - 45:5	3	P-306
45	20	45	23	45:20 - 45:23	3	P-306
79	8	79	10	79:8 - 79:10	4	P-307
79	21	80	7	79:21 - 80:7	4	P-307
134	15	134	20	134:15 - 134:20	10	P-309
134	22	135	3	134:22 - 135:3	10	P-309

<i>Contingent Designations – Roth</i>				
Start Page	Start Line	End Page	End Line	Page:Line Range
38	24	39	12	38:24 - 39:12
39	23	40	18	39:23 - 40:18

Respectfully submitted,

December 19, 2022

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