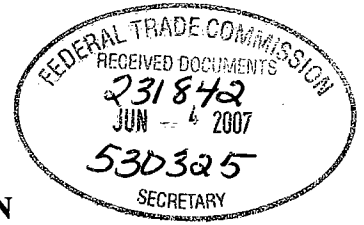


ORIGINAL



UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

In the Matter of

REALCOMP II LTD.,
a corporation.

Docket No. 9320

Public

COMPLAINT COUNSEL'S COUNTER DEPOSITION DESIGNATIONS AND
OBJECTIONS TO RESPONDENT'S DEPOSITION DESIGNATIONS

[REDACTED]

In accordance with Section 3.33 of the Commission's Rules of Practice (16 C.F.R. §3.33) and the Scheduling Order in this matter, Complaint Counsel provide the following list of the counter-designated portions of the depositions that may be offered in evidence in this matter:

[REDACTED]

Taylor, Robert
Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (3/14/07)

Objections

02:22 - 04:10 Hearsay; Motion in Limine Regarding Hypothetical Legal Issues; Denial

94:25 - 95:24 Evidence; Lacks Foundation; Speculation
Hearsay; Lacks Foundation; Speculation
102:9 - 103:19 Hearsay; Motion in Limine Regarding Hypothetical Legal Issues; Lacks
Foundation; Speculation
106:24 - 111:20 Hearsay; Motion in Limine Regarding Hypothetical Legal Issues; Lacks

Foundation; Speculation

Counter-designations (Contingent on Motion in Limine Being Denied)

103:20 - 106:23

Elya, David
Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (1/2/07)

Objections

04:55 - 04:05 Hearsay; Lacks Foundation; Speculation

Bratt, Virginia

~~Declaratory Judgment, S.D. Virginia, Case No. 03-00000000-0000 (03/25/07)~~

Objections

14:22 - 15:77 Lacks Foundation; Speculation
15:25 - 16:10 Lacks Foundation; Speculation
22:24 - 23:8 Lacks Foundation; Speculation; Hearsay
24:15 - 26:21 Lacks Foundation: Speculation: Hearsay

30:20 - 30:22 Lacks Foundation; Speculation
32:2 - 32:4; 32:14 Lacks Foundation; Speculation
32:20 - 32:4 Lacks Foundation; Speculation
33:6 - 33:19 Lacks Foundation; Speculation
33:20 - 34:6 Lacks Foundation; Speculation
35:1 - 35:3 Lacks Foundation: Speculation

Burke, Gerald

Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (1/30/07)

Objections

None

Counter-designations

None

Baczowski, Walt

Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (1/29/07)

Objections

88:25 - 90:9 Lacks Foundation, Speculation

Counter-designations

None

Niersbach, Clifford

Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (3/9/07)

Objections

122:3 - 123:12 Lacks Foundation; Hearsay
123:2 - 124:18 Lacks Foundation; Hearsay

Counter-designations

96:9 - 96:16
~~121:8 - 121:11~~

126:16 - 129:19

134:9 - 134:16

134:20-136:5

Goldberg, Robert

Counter-designations

126:2 - 126:18

128:23 - 128:2

Dawley, Philip

Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (3/20/07)

Objections

78:24 - 79:7

Lacks Foundation

Counter-designations

None

Greenspan, Robert

Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (3/20/07)

Objections

64:8 - 65:10

Lacks Foundation; Speculation

Counter-designations

21:24 - 22:12

65:11 - 65:18

Aronson, Wayne

Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (2/16/07)

Objections

None

Counter-designations

96:25 - 97:17

106:10 - 107:1

107:2 - 108:13

Groggins, Anita
Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (2/7/07)

Objections

43:24 – 44:6 Lacks Foundation; Speculation

Counter-designations

None

Kermath, Jeff
Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (2/6/07)

Objections

68:3 - 68:8 Speculation

Counter-designations

112:11 - 118:4

118:14 - 119:6

Adams, Dreu
Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (2/7/07)

Objections

11:8 – 11:23 Lacks Foundation; Speculation

Counter-designations

None

Mincy, Craig
Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (2/28/07)

Smith, Dale

Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (1/16/07)

Objections

4:5 - 4:9	Lacks Foundation; Speculation; Hearsay; Motion in Limine
5:22 - 23:2	Lacks Foundation; Speculation; Hearsay; Motion in Limine
23:14 - 30:20	Lacks Foundation; Speculation; Hearsay; Motion in Limine
30:23 - 43:21	Lacks Foundation; Speculation; Hearsay; Motion in Limine
44:7 - 61:3	Lacks Foundation; Speculation; Hearsay; Motion in Limine
61:14 - 69:15	Lacks Foundation; Speculation; Hearsay; Motion in Limine
69:20 - 71:16	Lacks Foundation; Speculation; Hearsay; Motion in Limine
71:20 - 96:3	Lacks Foundation; Speculation; Hearsay; Motion in Limine
96:9 - 113:15	Lacks Foundation; Speculation; Hearsay; Motion in Limine
114:5 - 122:16	Lacks Foundation; Speculation; Hearsay; Motion in Limine

Counter-designations

4:10 - 4:20
80:11 - 81:22
107:3 - 108:7
111:18 - 111:23
115:14 - 116:23

Moody, Gary

Hepp, Albert
Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (2/14/07)

Objections

None

~~Confidential~~

21:10 - 21:25

35:6 - 35:15

Respectfully submitted,



Sean Gates

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Joel Christie

Linda Holleran

Christopher Renner

Counsel Supporting the Complaint

Bureau of Competition

Federal Trade Commission

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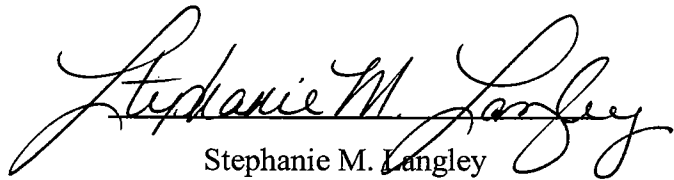
Facsimile: (202) 326-3496

Dated: June 4, 2007

CERTIFICATE OF SERVICE

This is to certify that on June 4, 2007, I caused a copy of the attached Complaint Counsel's Counter Deposition Designations and Objections to Respondent's Deposition Designations, to be served by electronic transmission and overnight courier to:

Scott Mandel, Esq.
Foster, Swift, Collins & Smith P.C.
313 South Washington Square
Lansing, MI 48933-2193


Stephanie M. Langley