

ORIGINAL

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL TRADE COMMISSION

530468

In the Matter of  
REALCOMP II LTD.,  
a corporation.

Docket No. 9320

Public

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

In accordance with Section 3.33 of the Commission's Rules of Practice (16 C.F.R. §3.33)

**Kage, Karen**  
**Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (2/20/07)**

**Objections**

28:19-23                      Rule 3.33(g)(1)(iv)

**Bowers, Darralyn**  
**Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (2/21/07)**

**Objections**

27:4-20                      Rule 3.33(g)(1)(iv)

**Gleason, Robert**  
**Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (2/23/07)**

**Objections**

20:17-40:22                      Rule 3.33(g)(1)(iv)

42:16-44:1                      Rule 3.33(g)(1)(iv)

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

**Objections**

6:23-24                      Rule 3.33(g)(1)(iv)  
33:2-8                      Rule 3.33(g)(1)(iv)  
47:5-12                      Rule 3.33(g)(1)(iv)  
47:16-20                      Rule 3.33(g)(1)(iv)  
88:19-89:2                      Rule 3.33(g)(1)(iv)  
141:24-142:4                      Rule 3.33(g)(1)(iv)  
142:16-21                      Rule 3.33(g)(1)(iv)

**Williams, Carl**  
**Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (1/17/07)**

**Objections**

7:11-18                      Rule 3.33(g)(1)(iv)  
9:7-12                      Rule 3.33(g)(1)(iv)

**Elya, David**

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

**Objections**

33:9-23 Rule 3.33(g)(1)(iv)  
76:22-79:24 Rule 3.33(g)(1)(iv)  
80:18-81:1 Rule 3.33(g)(1)(iv)

**Mulvihill, Daniel**

**Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (1/31/07)**

**Objections**

35:13-23 Rule 3.33(g)(1)(iv)

**Nead, Alissa**

**Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (1/10/07)**

**Objections**

5:16-18 Rule 3.33(g)(1)(iv); Incomplete Designation  
6:3-6 Rule 3.33(g)(1)(iv); Incomplete Designation  
26:10-13 Rule 3.33(g)(1)(iv); Incomplete Designation  
64:4-10 Rule 3.33(g)(1)(iv)

79:25-80:4 Incomplete Designation

87:13-14 Incomplete Designation

04:18-10 Incomplete Designation

137:8-23

Rule 3.33(g)(1)(iv)

**Bratt, Virginia**

**Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (2/27/07)**

**Objections**

92:15-22                      Rule 3.33(g)(1)(iv)

**Nowak, Martin**

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

**Objections**

None

**Burke, Gerald**

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

**Objections**

10:4-11:3                      Rule 3.33(g)(1)(iv)

14:24-15:24                      Rule 3.33(g)(1)(iv)

18:1-8                              Rule 3.33(g)(1)(iv)

43:10-16                         Rule 3.33(g)(1)(iv)

53:3-13                            Rule 3.33(g)(1)(iv)

59:11-60:1                        Rule 3.33(g)(1)(iv)

92:15-22  
10:4-11:3  
14:24-15:24  
18:1-8  
43:10-16  
53:3-13  
59:11-60:1

62:8-63:13                      Rule 3.33(g)(1)(iv)

62:8-63:13                      Rule 3.33(g)(1)(iv)

**Rademacher, Thomas**

**Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (1/31/07)**

**Cooper, John**  
**Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (1/3/07)**

**Objections**

26:18-27:11

Rule 3.33(g)(1)(iv)

31:17-18

Rule 3.33(g)(1)(iv)

**Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (1/17/07)**

**Objections**

59:22-60:4

Rule 3.33(g)(1)(iv)

**Tucholski, Ryan**

**Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (1/3/07)**

**Objections**

33:10-35:4

Rule 3.33(g)(1)(iv)

**Niersbach, Clifford**

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

**Objections**

55:8 - 55:21

Rule 3.33(g)(1)(iv)

**Dawley, Philip**

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

**Objections**

68:15 - 68:22 Rule 3.33(g)(1)(iv)  
80:24 - 81:17 Rule 3.33(g)(1)(iv); Hearsay  
83:14 - 84:2 Rule 3.33(g)(1)(iv)  
90:8 - 91:16 Rule 3.33(g)(1)(iv)  
94:6 - 94:22 Rule 3.33(g)(1)(iv)

**Bishop, Paul**

**Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (3/8/07)**

**Objections**

113:16 - 126:2 Rule 3.33(g)(1)(iv)  
127: 23 - 128:25 Rule 3.33(g)(1)(iv)  
119:21 - 121:17 Lacks Foundation; Best Evidence Rule  
121:18 - 123:6 Lacks Foundation; Best Evidence Rule; Hearsay  
123:7 - 123:25 Lacks Foundation; Hearsay  
124:1 - 124:18 Lacks Foundation; Hearsay  
125:22 - 126:2 Lacks Foundation

**Simos, Paul**

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

**Objections**

30:2 - 30:8 Rule 3.33(g)(1)(iv); Misleading; Speculation  
83:14 - 86:10 Rule 3.33(g)(1)(iv); Misleading; Speculation  
89:23 - 94:2 Rule 3.33(g)(1)(iv)

**Greenspan, Robert**

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

**Objections**

32:24 - 34:3 Rule 3.33(g)(1)(iv)

**Aronson, Wayne**

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

**Objections**

18:24-19:22	Speculation; Lacks Foundation
70:14-71:11	Rule 3.33(g)(1)(iv)
85:2-13	Rule 3.33(g)(1)(iv)
87:3-91:25	Rule 3.33(g)(1)(iv)
96:25-98:2	Rule 3.33(g)(1)(iv)
119:20-25	Rule 3.33(g)(1)(iv)

**Groggins, Anita**

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

**Objections**

24:9-25:18	Rule 3.33(g)(1)(iv)
<del>25:8-26:10</del>	<del>Rule 3.33(g)(1)(iv)</del>

37:9-19	Rule 3.33(g)(1)(iv)
51:14-17	Rule 3.33(g)(1)(iv)

**Kermath, Jeff**

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

**Objections**

None

**Adams, Dreu**

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

**Objections**

43:7-13	Incomplete Designation
66:22-67:4	Rule 3.33(g)(1)(iv)
68:7-69:8	Rule 3.33(g)(1)(iv)
84:22-85:5	Rule 3.33(g)(1)(iv)

**Kersten, John**

**Deposition In the Matter of Realcomp II Ltd., Docket No. 9320 (3/1/07)**

**Objections**

41:9-42:8	Rule 3.33(g)(1)(iv)
47:13-48:9	Rule 3.33(g)(1)(iv)
49:6-50:20	Rule 3.33(g)(1)(iv)
50:24-54:3	Rule 3.33(g)(1)(iv)

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Dated: June 11, 2007



**CERTIFICATE OF SERVICE**

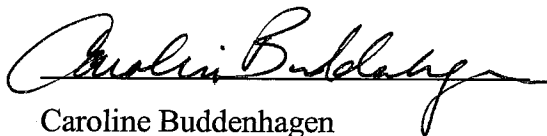
This is to certify that on June 11, 2007, I caused a copy of Complaint Counsel's Objections to Respondent's Counter Deposition Designations to be served upon the following person:

by electronic transmission and overnight courier to:

Scott Mandel, Esq.

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Caroline Buddenhagen