

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

**IN RE: KATRINA CANAL BREACHES *
CONSOLIDATED LITIGATION ***

CIVIL ACTION

NUMBER: 05-4182 “K”(2)

JUDGE DUVAL

**PERTAINS TO: MRGO, Robinson *
(No. 06-2268) ***

MAG. WILKINSON

**ROBINSON PLAINTIFFS’ OBJECTIONS TO EXHIBITS TO BE OFFERED AT TRIAL
BY THE DEFENDANT UNITED STATES OF AMERICA**

NOW INTO COURT, through undersigned counsel, comes the Plaintiffs Norman Robinson, Kent Lattimore, Lattimore & Associates, Tanya Smith, Anthony Franz, Jr., and Lucielle Franz, pursuant to Minute Entry dated March 31, 2009 (Rec. Doc. 18433), present their objections to the exhibits to be offered at trial by the defendant United States of America, as follows:

I.

Attached as Exhibit 1 is The United States’s Exhibit List as produced to the *Robinson* Plaintiffs. Undersign counsel has evaluated each exhibit and assigned a specific objection to the introduction of that exhibit.

II.

For sake of efficiency, a number identifying the specific objection was assigned to the document. These objections are referenced by the following numbers:

- a. Relevance - F.R.E. 401;
- b. Hearsay - F.R.E. 802 *et. seq.*;
- c. Foundation - F.R.E. 701-703;
- d. Prejudice, confusion or waste of time - F.R.E. 403;
- e. Lack of Personal Knowledge - F.R.E. 602;
- f. Not an Adjudicative Fact - F.R.E. 201.

III.

CONCLUSION

WHEREFORE, the Plaintiffs Norman Robinson, Kent Lattimore, Lattimore & Associates, Tanya Smith, Anthony Franz, Jr., and Lucielle Franz pray that their objections be deemed good and sufficient; and that after due deliberations by the Court, that the objections listed above be sustained.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the above and foregoing upon all counsel of record by placing same in the United States mail, properly addressed and with first-class postage, or by facsimile or other electronic transmission this 6th day of April, 2009.

/s/ Joseph M. Bruno

Joseph M. Bruno