IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

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| UNITED STATES OF AMERICA,<br><br>Plaintiff,<br><br>v.<br><br>ISEMAN & ASSOCIATES, LLC, *et al.*<br><br>Defendants. | No.: 1:25-cv-00450-MSN-LRV |

**UNITED STATES' OBJECTIONS AND COUNTER-DESIGNATIONS TO DEFENDANTS' DEPOSITION DESIGNATIONS**

Pursuant to Fed. R. Civ. P. 26(a)(3) and Local Civil Rule 30, the United States submits its objections and counter-designations to Defendant's deposition designations, dated October 3, 2025 (ECF No. 56). The United States reserves the right to amend and/or supplement its deposition objections and counter-designations, including with respect to the Court's rulings on any motions *in limine* or other pre-trial rulings. The United States also reserves the right to introduce or use any of Defendants' designations at trial, including as counter-designations, to the extent Defendants' do not do so. The United States further incorporates by reference herein, its deposition designations filed on October 3, 2025 (ECF No. 55).

I. The United States Objects to Any Designations for Lisa Blackmore

The United States objects to all designations for Lisa Blackmore. Deposition testimony of non-parties may only be used at trial in situations where the witness is "unavailable," as defined in Fed. R. Civ. P. 32(a)(4) and/or Fed. R. Evid. 804(a). Ms. Blackmore resides in Maryland and

is "available" under the Rules. Accordingly, her deposition is entirely inadmissible hearsay and, if Defendants wish to introduce her testimony, she must be called to testify at trial. While the United States makes specific objections and counter-designations to Ms. Blackmore's testimony, it does so in the alternative and without waiving its objection above.

The United States recognizes that, unlike Ms. Blackmore, Anna Rosing presently resides in New York, *i.e.*, more than 100 miles from the place of trial. *See* Fed. R. Civ. P. 32(a)(4)(B); Fed. R. Evid. 804(a)(5)(A). However, the United States reserves the right to object to the use of Ms. Rosing's deposition testimony if Ms. Rosing appears at the trial. *See Siquerios v. General Motors LLC*, 2022 WL 3974752, at *20 (N.D. Cal. Aug. 31, 2022) (deposition testimony inadmissible for witness who resides outside the subpoena power of the court but is present for trial because "the Court cannot countenance how a witness who is present at the courthouse and willing to testify could be 'unavailable' under Rule 804.").

II. Specific Objections and Counter-Designations

| Witness (Date) | Defendant's Designations | Objections | Counter-Designations |
|---|---|---|---|
| Blackmore (9.9.25) | 8:24-9:3 | | 9:4-9:10 |
| Blackmore (9.9.25) | 9:11-12 | | |
| Blackmore (9.9.25) | 9:19-25 | | |
| Blackmore (9.9.25) | 10:10-14 | | |
| Blackmore (9.9.25) | 11:13-17 | | 11:21-12:7 |
| Blackmore (9.9.25) | 12:11-25 | | |
| Blackmore (9.9.25) | 13:4-12 | | 13:1-3 |
| Blackmore (9.9.25) | 13:18-24 | | 14:2-9 |
| Blackmore (9.9.25) | 14:10-12 | | |
| Blackmore (9.9.25) | 15:10-17 | | 15:6-9 |
| Blackmore (9.9.25) | 15:25-16:4 | | |
| Blackmore (9.9.25) | 16:17-17:18 | | |
| Blackmore (9.9.25) | 18:18-19:4 | | |
| Blackmore (9.9.25) | 20:8-14 | | |
| Blackmore (9.9.25) | 20:16-21:7 | | |

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| Blackmore (9.9.25) | 21:11-22:15 | | |
| Blackmore (9.9.25) | 22:23-23:5 | | |
| Blackmore (9.9.25) | 25:3-7 | | |
| Blackmore (9.9.25) | 25:14-18 | | 25:19-22 |
| Blackmore (9.9.25) | 25:23-26:3 | | 26:12-24 |
| Blackmore (9.9.25) | 27:12-15 | | 27:16-22 |
| Blackmore (9.9.25) | 28:1-7 | | 28:8-20 |
| Blackmore (9.9.25) | 28:21-29:3 | | |
| Blackmore (9.9.25) | 29:10-12 | | |
| Blackmore (9.9.25) | 30:3-31:24 | | |
| Blackmore (9.9.25) | 32:1-38:10 | | |
| Blackmore (9.9.25) | 38:15-18 | | |
| Blackmore (9.9.25) | 38:25-41:11 | | |
| Blackmore (9.9.25) | 41:16-44:25 | | |
| Blackmore (9.9.25) | 45:5-46:22 | | |
| Blackmore (9.9.25) | 47:2-48:10 | | |
| Blackmore (9.9.25) | 48:20-61:2 | | |
| Blackmore (9.9.25) | 61:5-62:7 | | 62:7-8 |
| Blackmore (9.9.25) | 62:22-64:24 | | |
| Blackmore (9.9.25) | 65:01 | | |
| Blackmore (9.9.25) | 65:4-68:16 | | |
| Blackmore (9.9.25) | 68:18 | | |
| Blackmore (9.9.25) | 68:20-23 | | |
| Blackmore (9.9.25) | 69:2-70:13 | | |
| Blackmore (9.9.25) | 70:15-72:10 | | 72:14-25 |
| Blackmore (9.9.25) | 73:1-13 | | |
| Blackmore (9.9.25) | 73:19-24 | | |
| Blackmore (9.9.25) | 74:22-76:22 | | 77:24-78:2 |
| Blackmore (9.9.25) | 78:18-24 | | |
| Blackmore (9.9.25) | 79:17-80:6 | | |
| Blackmore (9.9.25) | 80:18-81:14 | | |
| Blackmore (9.9.25) | 83:9-84:11 | | |
| Blackmore (9.9.25) | 84:17-85:7 | | |
| Blackmore (9.9.25) | 86:21-87:19 | | |
| Blackmore (9.9.25) | 88:1-11 | | 88:14-15 |
| Blackmore (9.9.25) | 88:13 | Attorney Objection | |
| Blackmore (9.9.25) | 88:17-89:21 | | |
| Blackmore (9.9.25) | 90:21-24 | | 91:1-2 |
| Blackmore (9.9.25) | 91:3-21 | | |

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| Blackmore (9.9.25) | 92:6-16 | | |
| Blackmore (9.9.25) | 93:18-22 | | |
| Blackmore (9.9.25) | 94:17-95:5 | | |
| Blackmore (9.9.25) | 95:15-96:8 | | |
| Blackmore (9.9.25) | 96:15-99:18 | | |
| Blackmore (9.9.25) | 100:9-25 | | |
| Blackmore (9.9.25) | 101:23-103:9 | | |
| Blackmore (9.9.25) | 103:13-18 | | |
| Blackmore (9.9.25) | 104:14-105:3 | Hearsay; Relevance | |
| Blackmore (9.9.25) | 105:7-106:11 | Hearsay; Foundation; Lack of personal knowledge | |
| Blackmore (9.9.25) | 106:17-108:11 | | |
| Blackmore (9.9.25) | 108:15-110:3 | | |
| Blackmore (9.9.25) | 110:11-16 | | |
| Blackmore (9.9.25) | 110:21-111:24 | Hearsay | |
| Blackmore (9.9.25) | 112:3-6 | | |
| Blackmore (9.9.25) | 112:9-113:7 | | |
| Blackmore (9.9.25) | 113:9-114:15 | | |
| Blackmore (9.9.25) | 114:20-23 | | |
| Blackmore (9.9.25) | 115:1-20 | As to 115:16-20: Speculation; Foundation | |
| Blackmore (9.9.25) | 115:22-23 | Speculation; Foundation | |
| Blackmore (9.9.25) | 116:1-23 | | |
| Blackmore (9.9.25) | 117:25-118:6 | | |
| Blackmore (9.9.25) | 118:23-119:16 | | |
| Blackmore (9.9.25) | 120:6-122:7 | | |
| Blackmore (9.9.25) | 122:15-16 | Speculation; Foundation | |
| Blackmore (9.9.25) | 122:18-20 | Speculation; Foundation | |
| Blackmore (9.9.25) | 122:22-24 | | |
| Blackmore (9.9.25) | 123:5-7 | | |
| Blackmore (9.9.25) | 124:8-126:2 | | |
| Blackmore (9.9.25) | 126:6-24 | | |
| Blackmore (9.9.25) | 127:17-129:25 | Hearsay; Foundation; Lack of personal knowledge | |
| Blackmore (9.9.25) | 130:02 | Speculation; | |

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| | | Foundation | |
| Blackmore (9.9.25) | 130:4-7 | | |
| Blackmore (9.9.25) | 130:11-16 | Speculation; Foundation; Lack of personal knowledge | |
| Blackmore (9.9.25) | 130:18-25 | | 131:7-17 |
| Blackmore (9.9.25) | 133:1-9 | Speculation; Foundation; Lack of personal knowledge | |
| Blackmore (9.9.25) | 133:16-18 | | |
| Blackmore (9.9.25) | 133:21-134:4 | Speculation; Foundation; Lack of personal knowledge | |
| Blackmore (9.9.25) | 134:13-135:1 | | |
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| Rosing (9.10.25) | 7:14-16 | | |
| Rosing (9.10.25) | 8:8-14 | | |
| Rosing (9.10.25) | 9:12-17 | | |
| Rosing (9.10.25) | 10:11-16 | | |
| Rosing (9.10.25) | 11:3-8 | | |
| Rosing (9.10.25) | 11:23-12:16 | | |
| Rosing (9.10.25) | 12:21-13:5 | | |
| Rosing (9.10.25) | 14:8-18 | | |
| Rosing (9.10.25) | 15:15-17 | | |
| Rosing (9.10.25) | 15:20-25 | | |
| Rosing (9.10.25) | 17:2-9 | Foundation; Lack of personal knowledge | |
| Rosing (9.10.25) | 17:21-18:4 | | |
| Rosing (9.10.25) | 19:12-20:2 | | 20:3-5 |
| Rosing (9.10.25) | 20:9-25 | | |
| Rosing (9.10.25) | 21:17-24:11 | | |
| Rosing (9.10.25) | 24:20-24:22 | | |
| Rosing (9.10.25) | 25:21-23 | | 26:2-5 |
| Rosing (9.10.25) | 27:21-22 | | |
| Rosing (9.10.25) | 28:1-3 | | |
| Rosing (9.10.25) | 28:6-9 | | |
| Rosing (9.10.25) | 28:14-17 | | |
| Rosing (9.10.25) | 29:2-24 | | |
| Rosing (9.10.25) | 30:7-8 | | |
| Rosing (9.10.25) | 30:10-11 | | |

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| Rosing (9.10.25) | 31:5-8 | | 30:15-24 |
| Rosing (9.10.25) | 32:11 | Question without Answer | |
| Rosing (9.10.25) | 32:20-33:5 | | |
| Rosing (9.10.25) | 33:13-34:1 | Foundation; Lack of personal knowledge | |
| Rosing (9.10.25) | 35:12-16 | | |
| Rosing (9.10.25) | 36:4-14 | | |
| Rosing (9.10.25) | 36:22-37:6 | | |
| Rosing (9.10.25) | 38:8-9 | | |
| Rosing (9.10.25) | 38:19-25 | | |
| Rosing (9.10.25) | 39:5-9 | | |
| Rosing (9.10.25) | 39:24 | Foundation; Lack of personal knowledge | |
| Rosing (9.10.25) | 40:21-24 | | |
| Rosing (9.10.25) | 41:14-43:1 | | 43:2-6 |
| Rosing (9.10.25) | 43:7-12 | | |
| Rosing (9.10.25) | 44:14-45:2 | | |
| Rosing (9.10.25) | 45:21-46:3 | | |
| Rosing (9.10.25) | 46:9-11 | | |
| Rosing (9.10.25) | 46:17-47:8 | Foundation; Lack of personal knowledge | 47:10-11 |
| Rosing (9.10.25) | 47:12-48:13 | | |
| Rosing (9.10.25) | 48:17-49:6 | | |
| Rosing (9.10.25) | 49:8-19 | | |
| Rosing (9.10.25) | 49:23-51:6 | | 51:7-8 |
| Rosing (9.10.25) | 51:9-12 | | |
| Rosing (9.10.25) | 51:14-17 | | |
| Rosing (9.10.25) | 52:7-12 | Relevance | |
| Rosing (9.10.25) | 53:3-11 | | |
| Rosing (9.10.25) | 53:21-54:7 | | |
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| Rosing (9.11.25) | 6:3-24 | | |
| Rosing (9.11.25) | 7:4-13 | | |
| Rosing (9.11.25) | 8:3-5 | | |
| Rosing (9.11.25) | 8:10-17 | | |
| Rosing (9.11.25) | 9:12-19 | | |
| Rosing (9.11.25) | 11:18-12-4 | | |
| Rosing (9.11.25) | 12:10-21 | Foundation; Lack of personal knowledge; | |

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| | | Assumes facts not in evidence | |
| Rosing (9.11.25) | 13:8-20 | | |
| Rosing (9.11.25) | 14:4-15 | | |
| Rosing (9.11.25) | 15:2-4 | | |
| Rosing (9.11.25) | 15:10-21 | | |
| Rosing (9.11.25) | 16:14-21 | | |
| Rosing (9.11.25) | 17:6-13 | Foundation; Lack of personal knowledge | |
| Rosing (9.11.25) | 18:6-19:6 | As to 18:6-8: Foundation; Assumes facts not in evidence | |
| Rosing (9.11.25) | 22:15-24:10 | | |
| Rosing (9.11.25) | 26:4-11 | Foundation; Assumes facts not in evidence; Impermissible hypothetical | |
| Rosing (9.11.25) | 27:23-28:11 | | |
| Rosing (9.11.25) | 28:14-29:13 | Hearsay; Relevance | |
| Rosing (9.11.25) | 29:23-32:2 | | |
| Rosing (9.11.25) | 32:11-24 | | |
| Rosing (9.11.25) | 33:5-9 | | |
| Rosing (9.11.25) | 33:16-25 | | |
| Rosing (9.11.25) | 36:9-11 | Foundation; Speculation; Lack of personal knowledge | |
| Rosing (9.11.25) | 36:13 | Foundation; Speculation; Lack of personal knowledge | |
| Rosing (9.11.25) | 37:12-19 | Foundation; Speculation | |
| Rosing (9.11.25) | 38:4-12 | Foundation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 38:25-39:16 | Foundation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 43:6-44:10 | Foundation; Assumes facts not in evidence; Lack of personal knowledge; Impermissible | |

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| | | hypothetical | |
| Rosing (9.11.25) | 44:21-45:14 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 46:22-47:7 | Hearsay; Lack of personal knowledge | |
| Rosing (9.11.25) | 48:1-5 | Foundation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 48:7-49:22 | Hearsay | |
| Rosing (9.11.25) | 50:8-52:12 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 52:20-53:1 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence; call for legal conclusion | |
| Rosing (9.11.25) | 53:3-6 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence; call for legal conclusion | |
| Rosing (9.11.25) | 53:9-12 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence; call for legal conclusion | |
| Rosing (9.11.25) | 53:14-15 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence; call for legal conclusion | |
| Rosing (9.11.25) | 53:17-20 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in | |

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| | | evidence; call for legal conclusion | |
| Rosing (9.11.25) | 53:22 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence; call for legal conclusion | |
| Rosing (9.11.25) | 53:24-54:2 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence; call for legal conclusion | |
| Rosing (9.11.25) | 54:4-7 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 54:9-11 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 54:14-17 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 60:6-21 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 62:11-14 | Foundation; Speculation; Lack of personal knowledge | |
| Rosing (9.11.25) | 63:18-21 | Foundation; Lack of personal knowledge | |
| Rosing (9.11.25) | 64:4-14 | | 64:16-25 |
| Rosing (9.11.25) | 65:1-23 | 65:1-15: Hearsay<br>65:19-23: Speculation | |
| Rosing (9.11.25) | 65:25 | Speculation | |
| Rosing (9.11.25) | 66:10-23 | | |
| Rosing (9.11.25) | 68:2-5 | | |

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| Rosing (9.11.25) | 68:22-70:7 | Foundation; Speculation; Lack of personal knowledge | |
| Rosing (9.11.25) | 71:1-2 | Speculation; Lack of personal knowledge | |
| Rosing (9.11.25) | 71:4 | Foundation; Speculation; Lack of personal knowledge | |
| Rosing (9.11.25) | 71:16-22 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 71:24-72:3 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 72:5 | Foundation; Speculation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 72:7-8 | | |
| Rosing (9.11.25) | 72:10-73:1 | | |
| Rosing (9.11.25) | 73:3-11 | Speculation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 73:13 | Speculation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 73:15 | Speculation; Lack of personal knowledge; Assumes facts not in evidence | |
| Rosing (9.11.25) | 73:17-19 | | |
| Rosing (9.11.25) | 73:21-74:25 | Foundation; lack of personal knowledge | |
| Rosing (9.11.25) | 75:10-17 | | |
| Rosing (9.11.25) | 76:1-10 | Speculation | |
| Rosing (9.11.25) | 76:12 | Speculation | |
| Rosing (9.11.25) | 76:14-17 | Speculation | |

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| Rosing (9.11.25) | 77:11-12 | Speculation; Lack of personal knowledge | |
| Rosing (9.11.25) | 77:14-16 | Speculation; Lack of personal knowledge | |
| Rosing (9.11.25) | 77:18-20 | Speculation; Lack of personal knowledge | |
| Rosing (9.11.25) | 81:4-7 | | |
| Rosing (9.11.25) | 81:9-10 | | |
| Rosing (9.11.25) | 84:13-85:3 | | |
| Rosing (9.11.25) | 85:5 | | |
| Rosing (9.11.25) | 86:14-23 | | |

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Respectfully submitted,

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