

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION

CASE NO. 9:25-CV-80526-DMM

GOOD SAMARITAN MEDICAL
CENTER, INC., et al.,

Plaintiffs,

v.

THE LEAPFROG GROUP,

Defendant.

LEAPFROG'S DEPOSITION DESIGNATIONS

The Leapfrog Group, by and through their undersigned counsel, hereby submit the following updated written deposition designations and objections.

1. Table 1: Leapfrog's Revised Designations, Plaintiffs' Counter-designations, Leapfrog's objections to Plaintiffs' Counter-designations, Leapfrog's Reply-designations, and Plaintiffs' objections to Leapfrog's Reply-designations of Dr. Matt Austin's deposition.

The Leapfrog Group intends to present these designations and objections at trial. The Leapfrog Group reserves the right to remove any portion of these designations before or at the trial in this case. The Leapfrog Group reserves the right to submit any testimony that has been designated by The Leapfrog Group either affirmatively or in its counter designations.

Key to Objections:

- AA: Asked & Answered/Duplicative
- BER: Best Evidence Rule
- C: Compound
- CU: Cumulative
- H: Hearsay
- IH: Improper Hypothetical
- L: Leading
- LF: Lacks Foundation
- M: Mischaracterizes Testimony
- MD: Mischaracterizes Document
- N: Non-Responsive
- PK: No Personal Knowledge/Lacks foundation
- R: Relevance
- S: Calls for Speculation
- T: Time Wasting
- V: Vague & Ambiguous

Table 1: Leapfrog's Deposition Designations of Matt Austin - 9/25/2025								
Leapfrog's Affirmative Designations		Objections to Leapfrog's Designations	Plaintiffs' Counter-Designations		Objections to Plaintiffs' Counter-Designations	Leapfrog's Reply Designations		Objections to Reply Designations
From: Page:Line	To: Page:Line		From: Page:Line	To: Page:Line		From: Page:Line	To: Page:Line	
39:9	40:7	No Objection						
52:12	53:10	No Objection						
60:5	60:21	No Objection						
61:2	63:4		64:11	65:10	No objection.			
64:15	65:10	No objection.						
74:2	74:6	No Objection						
81:10	83:16	No Objection						
85:4	85:21	No Objection						
93:21	95:7	No Objection						
96:5	97:12	No Objection						
101:20	102:13							
105:7	107:10	No Objection	107:11	107:13	No objection.			
108:10	110:7	No Objection						
110:18	111:21	No Objection						
		Clarification. Propose cutting non-substantive discussion at 113:1316 for time						
112:11	114:13							
115:6	121:5	No Objection	114:15	115:1	No objection.			
125:5	127:12	No Objection						

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From: Page:Line	To: Page:Line		From: Page:Line	To: Page:Line		From: Page:Line	To: Page:Line	
159:7	159:12	No Objection						
176:4	176:11	No Objection	176:12	176:21	R			
177:19	178:1	No Objection						
181:3	181:20	No Objection	180:4	181:2	No objection.			
192:17	193:12	No Objection						
		No Objection	201:11	202:4	Completeness	200:11	201:10	Objection. R.
202:5	203:2		203:3	203:5	No objection.			
204:18	205:4	No Objection						
208:1	209:4	Objection. Ms. Lawson's objection is waived by non-appearance.						

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Leapfrog's Affirmative Designations		Objections to Leapfrog's Designations	Plaintiffs' Counter-Designations		Objections to Plaintiffs' Counter-Designations	Leapfrog's Reply Designations		Objections to Reply Designations
From: Page:Line	To: Page:Line		From: Page:Line	To: Page:Line		From: Page:Line	To: Page:Line	
209:9	210:8	Clarification. Propose cutting 209:21-210:7 for timing. Objection: Ms. Lawson's objection at 209:21-210:2 is waived by non-appearance & clarification question is not proper						
212:5	212:17							
214:10	216:19	No Objection						
224:9	224:16	No Objection						
238:2	238:16	No Objection						
240:2	240:9	No Objection						
241:16	241:19	No Objection	241:9	241:15	No objection.			
			241:20	241:21				
243:16	245:16	Objection. Ms. Lawson's objection at 243:19-244:2 is waived by non-ap-						

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Leapfrog's Affirmative Designations		Objections to Leapfrog's Designations	Plaintiffs' Counter-Designations		Objections to Plaintiffs' Counter-Designations	Leapfrog's Reply Designations		Objections to Reply Designations
From: Page:Line	To: Page:Line		From: Page:Line	To: Page:Line		From: Page:Line	To: Page:Line	
247:3	247:14	No Objection	248:5	248:7	No objection.			
248:8	249:9	No Objection						
250:10	250:16	Objection. Incomplete designation / no question designated.	249:10	250:9	No objection.			
			250:17	250:20	No objection.			
268:1	268:10	No Objection						
275:16	277:19	No Objection						
281:2	281:10	Objection. N.						
282:2	282:7	No Objection						
284:11	285:6	No Objection						
298:2	298:8	No Objection						
353:11	353:20	No Objection	352:4	353:10				
354:1	354:9	No Objection						
370:10	370:20	Objection IH, LF, AF, L, S, V						
384:14	384:21	No Objection						

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From: Page:Line	To: Page:Line		From: Page:Line	To: Page:Line		From: Page:Line	To: Page:Line	
388:3	389:8	Objection. N, V.						
390:6	390:21	Objection V, S.						
392:9	392:19	No Objection						

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 21st day of January, 2026 a true and correct copy of the foregoing document has been electronically filed with the Clerk of the Court using the CM/ECF E-Filing Portal, which will send electronic filing to all counsel of record.

s/Jura C. Zibas

Jura C. Zibas