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 Lauren Bailey'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.

Leapfrog's Deposition Designations of Lauren Bailey								
Leapfrog's Designations		**Objections to Leapfrog's Designations**	**Plaintiffs' Counter-Designations**		**Objections to Plaintiffs' Counter-Designations**	**Leapfrog's Reply Designations**		**Objections to Leapfrog's Reply Designations**
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15:11	16:15							
17:3	18:10							
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30:15	31:5							
31:21	32:13							
62:5	62:18							
83:5	83:18							
103:21	104:4							
157:10	161:13							
174:10	175:20							
179:7	180:1							
196:1	197:6							

Leapfrog's Deposition Designations of Lauren Bailey								
Leapfrog's Designations		**Objections to Leapfrog's Designations**	**Plaintiffs' Counter-Designations**		**Objections to Plaintiffs' Counter-Designations**	**Leapfrog's Reply Designations**		**Objections to Leapfrog's Reply Designations**
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206:19	207:18							
224:10	225:4							
243:11	243:17							
290:5	290:13							
311:16	312:3							
315:1	315:13							

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 22nd 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