Matt A. Kornhauser State Bar No. 11684500 Dylan B. Russell

State Bar No. 24041839 Christopher J. Kronzer

State Bar No. 24060120

HOOVER SLOVACEK LLP

5051 Westheimer, Suite 1200

Houston, Texas 77056 Telephone: (713) 977-8686 Facsimile: (713) 977-5395

kornhauser@hooverslovacek.com russell@hooverslovacek.com kronzer@hooverslovacek.com

Attorneys for Sequitur Permian, LLC

Jeff P. Prostok State Bar No. 16352500 J. Robert Forshey State Bar No. 07264200 Suzanne K. Rosen State Bar No. 00798518 FORSHEY & PROSTOK LLP

777 Main St., Suite 1550 Ft. Worth, TX 76102 (817) 877-8855 Telephone (817) 877-4151 Facsimile iprostok@forshevprostok.com bforshey@forsheyprostok.com srosen@forsheyprostok.com

Local Counsel for Sequitur Permian, LLC

IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

In re: Chapter 11 § VISTA PROPPANTS AND LOGISTICS, Case No. 20-42002-ELM-11 LLC, ET AL.,1 (Jointly Administered) Debtors. MAALT, LP, Plaintiff, ADV. PROC. NO. 20-04064-ELM v. SEQUITUR PERMIAN, LLC, Defendant.

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Vista Proppants and Logistics, LLC (7817) ("Vista HoldCo"); VPROP Operating, LLC (0269) ("VPROP"); Lonestar Prospects Management, L.L.C. (8451) ("Lonestar Management"); MAALT Specialized Bulk, LLC (2001) ("Bulk"); Denetz Logistics, LLC (8177) ("Denetz"); Lonestar Prospects, Ltd. (4483) ("Lonestar Ltd."); and MAALT, LP (5198) ("MAALT"). The location of the Debtors' service address is 4413 Carey Street, Fort Worth, TX 76119-4219.



SEQUITUR PERMIAN, LLC'S SUPPLEMENTAL OBJECTIONS TO PLAINTIFF, MAALT, LP'S TRIAL EXHIBIT LIST

SEQUITUR PERMIAN, LLC ("Sequitur" or "Defendant") respectfully submits the following supplemental objections to Plaintiff, Maalt, LP's ("Maalt") or "Plaintiff") Trial Exhibit List:

DEFENDANT'S OBJECTIONS TO PLAINTIFF'S DEPOSITION EXCERPTS

1. Defendant files these objections to the designation of deposition excerpts in Exhibit 238, Deposition Excerpts of Stan Meador, as amended on June 7, 2021:

A. <u>Exhibit 239 – Deposition Excerpts of Stan Meador.</u>

Pg:Ln	Objection(s)	Ruling
30:11-14	Relevance	
30:17	Relevance	
30:19-21	Relevance	
30:23-24	Relevance	
31:1-5	Relevance	
31:7-11	Relevance	
31:12-15	Relevance	
31:17-18	Relevance	
33:7-8	Speculative; lack of foundation, relevance	
33:15-16	Relevance	
33:19	Relevance	
34:11-16	Speculative, lack of foundation	
35:1-10	Speculative, lack of foundation	
35:14-17	Speculative, lack of foundation, assuming facts not in	
	evidence	
35:20-22	Speculative, lack of foundation	
39:16	Relevance	
39:22	Relevance	
39:24	Relevance	
40:1-2	Relevance	
40:4-7	Relevance	
40:9-10	Relevance	
40:15	No question designated	
41:25	Relevance	
161:13-20	Hearsay, speculative	
162:12-20	Speculative	

162:22-	Answer based on hearsay, speculative	
162.22-	Allswei based on hearsay, speculative	
167:11-25	Answer calls for hearsay, counsel testifying	
168:17-19	Speculative	
168:23-	Answer calls for hearsay, relevance, counsel testifying	
170:1	Allswer cans for hearsay, relevance, counser testifying	
174:5-23	Answer calls for hearsay, relevance, counsel testifying	
174.3-23	Answer cans for hearsay, relevance, counser testrying Answer based on hearsay, speculative	
175:6-13	Answer calls for hearsay, counsel testifying	
186:21-	Relevance	
187:5	Refevance	
191:24-	Speculative	
191.24-	Speculative	
194:17-22	Speculative, answer based on hearsay	
195:20-	Speculative, answer based on hearsay Speculative, lack of foundation, calls for expert opinion	
195.20-	Speculative, lack of foundation, cans for expert opinion	
198:4-7	Calls for speculation	
198:9-18	Speculative, lack of foundation	
200:18-19	Relevance	
200:18-19	Relevance	
201:5	Relevance	
201:7	Relevance	
202:2	Speculative	
202:18	Speculative Speculative, lack of foundation, calls for expert opinion	
203:3-13	Speculative Speculative	
203.3-13	Relevance	
204:12-13	Relevance	
204.17	Relevance, calls for hearsay, vague	
204:18-21		
204.24-23	Relevance, Calls for speculation Relevance	
205:24-	Question calls for hearsay	
205.24-	Question cans for hearsay	
208:11-12	Speculative, lack of foundation	
208:17-21	Answer based on hearsay, speculative	
209:7-10	Calls for hearsay, calls for speculation	
209:13-14	Calls for speculation, calls for hearsay, lack of foundation	
213:16-22	Hearsay, counsel testifying	
213:10-22	Answer based on hearsay, speculative, lack of foundation	
214:25-	Answer based on hearsay, speculative, lack of foundation,	
214.23-	relevance	
215:8	Answer based on hearsay, speculative, lack of foundation,	
213.0	relevance	
215:17-	Answer based on hearsay, speculative, lack of foundation	
216:4	7 ms wer bused on nearbay, speculative, lack or foundation	
217:12	Answer based on hearsay, counsel testifying	
41/.14	1 monor oused on nearsay, counser testifying	

217:13-15	Leading, answer calls for hearsay
218:3-7	Calls for speculation, lack of foundation, leading
221:8-9	Leading
222:9-10	Relevance
222:12-14	Vague, calls for speculation
226:12-18	Calls for hearsay, leading
226:21-	Mischaracterization of evidence, vague, compound question
227:1	
227:18-20	Call for legal opinion
231:21-24	Answer based on hearsay
237:20-24	Answer based on hearsay
238:15-22	Answer based on hearsay

Respectfully Submitted,

/s/ Matthew A. Kornhauser
Matthew A. Kornhauser
State Bar No. 11684500
Dylan B. Russell
State Bar No. 24041839
Christopher J. Kronzer
State Bar No. 24060120
HOOVERSLOVACEK LLP
5051 Westheimer, Suite 1200

Houston, Texas 77056
Telephone: (713) 977-8686
Facsimile: (713) 977-5395
kornhauser@hooverslovack.com
russell@hooverslovacek.com
kronzer@hooverslovacek.com

ATTORNEYS FOR DEFENDANT, SEQUITUR PERMIAN, LLC

-AND-

Jeff P. Prostok
State Bar No. 16352500
J. Robert Forshey
State Bar No. 07264200
Suzanne K. Rosen
State Bar No. 00798518
FORSHEY & PROSTOK LLP
777 Main St., Suite 1550
Ft. Worth, TX 76102
(817) 877-8855 Telephone
(817) 877-4151 Facsimile
jprostok@forsheyprostok.com
bforshey@forsheyprostok.com
srosen@forsheyprostok.com

LOCAL COUNSEL FOR DEFENDANT, SEQUITUR PERMIAN, LLC

CERTIFICATE OF SERVICE

I hereby certify that on June 14, 2021 a copy of the foregoing Brief was served through the Court's ECF system on those parties receiving ECF notice, and as indicated below on the parties reflected below.

Via Email:

Stephen M. Pezanosky (<u>stephen.pezanosky@haynesboone.com</u>)

Matthew T. Ferris (matt.ferris@haynesboone.com)

David L. Staab (david.staab@haynesboone.com)

Alexandra Kirincic (alex.kirincic@haynesboone.com)

Via Email:

Jim Lanter (jim.lanter@lanter-law.com)

Via Email:

Paul O. Wickes (pwickes@wickeslaw.com)

/s/ Matthew A. Kornhauser
Matthew A. Kornhauser