

CAUSE NO. D-1-GN-11-003130

TEXAS TAXPAYER & STUDENT  
FAIRNESS COALITION, *et al.*,

Plaintiffs,

VS.

MICHAEL WILLIAMS, TEXAS  
COMMISSIONER OF EDUCATION, *et.al.*,

Defendants

*Consolidated Case:*

FORT BEND INDEPENDENT SCHOOL  
DISTRICT, *et al.*,

Plaintiffs,

VS.

MICHAEL WILLIAMS, TEXAS  
COMMISSIONER OF EDUCATION, *et. al.*,

Defendants.

IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

200<sup>TH</sup> JUDICIAL DISTRICT

**FORT BEND ISD PLAINTIFFS' WITNESS LIST**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiffs Fort Bend Independent School District, *et. al.* ("FBISD" or "District") submits  
the following preliminary Witness List:

- (1) Mr. Lynn M. Moak – **Will Call**  
Moak Casey & Associates, LLP

Mr. Moak is a partner at Moak Casey & Associates, LLP and an expert witness in this matter. He is expected to testify regarding issues in his written reports—including the adequacy, suitability, and efficiency of the public school finance system in Texas, student performance issues, property tax issues, and the Financial Allocation Study of Texas. He may also be called to testify as a rebuttal witness on issues raised by the testimony and reports of other witnesses.

- (2) Mr. Daniel T. Casey – **Will Call**  
Moak Casey & Associates, LLP

Mr. Casey is a partner at Moak Casey & Associates, LLP and an expert witness in this matter. He is expected to testify regarding issues in his written report, including the adequacy, suitability, and efficiency of the public school finance system in Texas, the operation of individual weights and adjustments in the current system, the process for revising weights and adjustments, and funding for facilities. He may also be called to testify as a rebuttal witness on issues raised by the testimony and reports of other witnesses.

- (3) Dr. William D. Duncombe – **Will Call**  
Professor of Public Administration and International Affairs  
Education Finance and Accountability Program  
Center for Policy Research  
The Maxwell School  
Syracuse University

Dr. Duncombe is a Professor of Public Administration and International Affairs at the Maxwell School at Syracuse University and a Senior Research Associate at the Center for Policy Research at The Maxwell School at Syracuse University and is an expert witness in this matter. He is expected to testify about issues in his written reports, including the costs involved in meeting the increased performance standards in Texas and of education economically disadvantaged, limited English proficiency, and other “special need” students. He may also be called to testify as a rebuttal witness on issues raised by the testimony and reports of other witnesses.

- (4) Dr. Steve H. Murdock – **Will Call**  
Allyn and Gladys Cline Professor of Sociology  
Director, Hobby Center for the Study of Texas  
Department of Sociology and Hobby Center  
Rice University

Dr. Murdock is the Allyn and Gladys Cline Professor of Sociology at Rice University and the Director of the Hobby Center for the Study of Texas and is an expert witness in this matter. He is expected to testify about issues in his written reports, including the changing demographics and population growth in Texas and their impact on the Texas economy. He may also be called to testify as a rebuttal witness on issues raised by the testimony and reports of other witnesses.

- (5) Dr. Allan Odden – **Will Call**  
Lawrence O. Picus and Associates

Dr. Odden is a principal partner in Lawrence O. Picus and Associates and a Professor of Education Leadership and Policy Analysis and the Co-Director of the Consortium for Policy Research in Education at the University of Wisconsin-Madison and is an expert witness in this

matter. He is expected to testify about issues raised in his written report, including the adequacy of the school finance system in Texas and the kinds of spending strategies that would improve student performance and the costs of implementing those strategies. He may also be called to testify as a rebuttal witness on issues raised by the testimony and reports of other witnesses.

- (6) Dr. Jacob L. Vigdor – **Will Call**  
Sanford School of Public Policy  
Duke University

Dr. Vigdor is a Professor of Public Policy and Economics at the Sanford School of Public Policy at Duke University and is an expert witness in this matter. He is expected to testify about issues contained in his written reports, including the teacher labor market and the importance of recruiting, retaining, and training quality teachers and their impact on student performance. He may also be called to testify as a rebuttal witness on issues raised by the testimony and reports of other witnesses.

- (7) Dr. Diane Schanzenbach – **Will Call**  
School of Education and Social Policy  
Northwestern University

Dr. Schanzenbach is a Professor at the School of Education and Social Policy at Northwestern University and is an expert witness in this matter. She is expected to testify about matters in her written report, including a review of the academic class size literature and a discussion of Texas class size policy in light of this literature. She may also be called to testify as a rebuttal witness on issues raised by the testimony and reports of other witnesses.

- (8) Dr. W. Steven Barnett – **Will Call**  
Rutgers University

Dr. Barnett is a Professor of Education Economic and Public Policy and Director of the National Institute for Early Education Research at Rutgers University and is an expert witness in this matter. He is expected to testify about the matters contained in his written report, including the effects of high quality preschool and prekindergarten programs on children's school readiness and performance and the quality and sufficiency of resources available for Texas's preschool program. He may also be called to testify as a rebuttal witness on issues raised by the testimony and reports of other witnesses.

- (9) Dr. Guy Sconzo – **Will Call**  
Humble Independent School District

Dr. Guy Sconzo is the Superintendent of Humble Independent School District and a fact witness in this matter. He is expected to testify regarding the adequacy and sufficiency of state and local funding for Humble ISD, the operation and impact of rising accountability and student performance standards and other State and federal requirements on Humble ISD, and challenges of adapting to the changing student population in Humble ISD. He may also be called to testify as a rebuttal witness on issues raised by the testimony of other witnesses.

- (10) Dr. Heath Burns – **May Call**  
Abilene Independent School District

Dr. Burns is the Superintendent of Abilene Independent School District and a fact witness in this matter. He is expected to testify regarding the adequacy and sufficiency of state and local funding for Abilene ISD, the operation and impact of rising accountability and student performance standards and other State and federal requirements on Abilene ISD, and challenges of adapting to the changing student population in Abilene ISD. He may also be called to testify as a rebuttal witness on issues raised by the testimony of other witnesses.

- (11) Dr. Rod Schroder – **May Call**  
Amarillo Independent School District

Dr. Schroder is the Superintendent of Amarillo Independent School District and a fact witness in this matter. He is expected to testify regarding the adequacy and sufficiency of state and local funding for Amarillo ISD, the operation and impact of rising accountability and student performance standards and other State and federal requirements on Amarillo ISD, and challenges of adapting to the changing student population in Amarillo ISD. He may also be called to testify as a rebuttal witness on issues raised by the testimony of other witnesses.

- (12) Dr. Meria Carstarphen – **May Call**  
Austin Independent School District

Dr. Carstarphen is the Superintendent of Austin Independent School District and a fact witness in this matter. She is expected to testify regarding the adequacy and sufficiency of state and local funding for Austin ISD, the operation and impact of rising accountability and student performance standards and other State and federal requirements on Austin ISD, and challenges of adapting to the changing student population in Austin ISD. She may also be called to testify as a rebuttal witness on issues raised by the testimony of other witnesses.

- (13) Dr. Tracy Hoke – **May Call**  
Fort Bend Independent School District

Dr. Hoke is the Chief Financial Officer for Fort Bend Independent School District and a fact witness in this matter. She is expected to testify about the adequacy and sufficiency of facilities funding for Fort Bend ISD and the impact of the .50 cent debt test on fast-growing school districts. She may also testify regarding the adequacy and sufficiency of state and local funding for Fort Bend ISD, the operation and impact of rising accountability and student performance standards and other State and federal requirements on Fort Bend ISD, and challenges of adapting to the changing student population in Fort Bend ISD. She may also be called to testify as a rebuttal witness on issues raised by the testimony of other witnesses.

- (14) Mr. Joe Wisnoski – **Will Call**  
Moak Casey & Associates, LLP

Mr. Wisnoski is an associate at Moak Casey & Associates, LLP and a former Deputy Associate Commissioner for Finance of the Texas Education Agency and is a fact witness in this matter. Mr. Wisnoski is expected to testify regarding the structure and operation of the structure and operation of the school finance system, as previously presented to the Court on August 28, 2012.

- (15) Ms. Criss Cloudt – **Will Call**  
Texas Education Agency

Criss Cloudt is the Associate Commissioner, Assessment and Accountability at the Texas Education Agency. Ms. Cloudt is expected to testify about the accountability system, the development of the Texas Assessment of Knowledge and Skills the State of Texas Assessment of Academic Readiness, development of assessment standards, and educational achievement benchmarks.

- (16) Dr. Stephen P. Klein – **May Call**  
Gansk & Associates

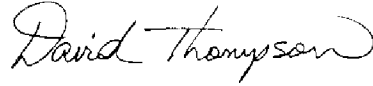
Dr. Klein is a senior research scientist and a senior partner with the consulting firm of Gansk and Associates. He may testify about matters contained in his written report, including the recent trends in test scores for NAEP and TAKS exams and the linking and bridging studies concerning TAKS and STAAR exams. He may also be called to testify as a rebuttal witness on issues raised by the testimony and reports of other witnesses.

- (17) Mr. Kevin O'Hanlon – **Will Call**  
O'Hanlon, McCollom & Demerath

Mr. O'Hanlon is an attorney with O'Hanlon, McCollom & Demerath and an expert witness in this matter. He is expected to testify about attorneys' fees and costs.

Respectfully submitted,

THOMPSON & HORTON LLP



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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document has been forwarded on this 15th day of October, 2012 to counsel of record in accordance with Rule 21a of the Texas Rules of Civil Procedure and the parties' Rule 11 Agreement, as follows:

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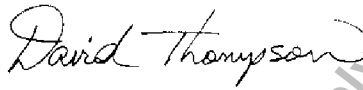
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*Attorneys for Charter School Association Plaintiffs*



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J. David Thompson, III

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TEXAS TAXPAYER & STUDENT  
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**FORT BEND ISD PLAINTIFFS' DEPOSITION DESIGNATIONS**

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiffs Fort Bend Independent School District, *et. al.* ("Fort Bend ISD Plaintiffs")  
submit the following preliminary deposition designations:

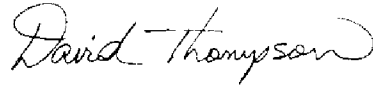
- (1) Oral Deposition of Guy Sconzo, Ph.D., dated August 22, 2012.
- (2) Oral Deposition of Bonny Cain, Ed.D., dated September 4, 2012.
- (3) Oral Deposition of Heath Burns, Ed.D. dated September 5, 2012.
- (4) Oral Deposition of Jeffrey M. Hanks, Ph.D., dated September 7, 2012
- (5) Oral Deposition of Dr. Tracy Hoke, dated September 11, 2012.
- (6) Oral Deposition of Wanda Bamberg, Ed.D., dated September 19, 2012.
- (7) Oral Deposition of Floyd Michael Miles, dated September 19, 2012.

- (8) Oral Deposition of Dr. Diane Frost, dated September 26, 2012.
- (9) Oral Deposition of Dr. Alfred Ray, dated September 27, 2012.
- (10) Oral Deposition of Rodney R. Schroder, dated September 27, 2012.

Dr. John Folks, former Superintendent of Northside ISD is being deposed on October 16, 2012, and the Fort Bend ISD Plaintiffs anticipate designating his deposition, as well. Per agreement with the State Defendants, the Fort Bend ISD Plaintiffs preliminarily designate these depositions in their entirety, with both parties reserving the right to object to certain pages and lines of the deposition by the October 19, 2012 deadline for objections.

Respectfully submitted,

THOMPSON & HORTON LLP



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## **CERTIFICATE OF SERVICE**

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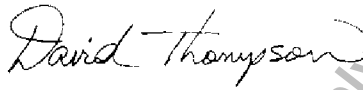
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TEXAS TAXPAYER & STUDENT  
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**FORT BEND ISD PLAINTIFFS'  
TRIAL EXHIBIT LIST**

Plaintiffs Fort Bend ISD, et. al. ("The Fort Bend ISD Plaintiffs") file this their Trial Exhibit List (the "Trial Exhibit List"). See Exhibit "A" attached hereto.

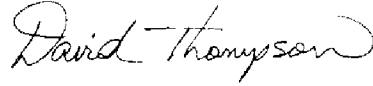
The Fort Bend Plaintiffs expressly reserve the right to withdraw any exhibits or object to the admissibility of any exhibit subject to the Court's ruling on certain legal issues. By identifying these exhibits, the Fort Bend Plaintiffs do not waive their right to object if Defendants attempt to offer the exhibit at trial.

The Fort Bend ISD Plaintiffs expressly reserve the right to amend or supplement the Trial Exhibit List.



Respectfully submitted,

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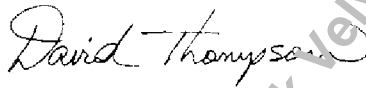
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Exhibit "A"

**FORT BEND ISD PLAINTIFFS' TRIAL EXHIBIT LIST**

*Abilene ISD – Dr. Heath Burns*

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
539.		Abilene ISD Slides	Burns Depo Ex. 539		
543.		AEIS 2010-11 Abilene ISD	Burns Depo Ex. 543		
544.		AEIS 2009-10 Abilene ISD	Burns Depo Ex. 544		
545.		AEIS 2008-09 Abilene ISD	Burns Depo Ex. 545		
546.		AEIS 2007-08 Abilene ISD	Burns Depo Ex. 546		
547.		AEIS 2006-07 Abilene ISD	Burns Depo Ex. 547		
556.		2012-13 Adopted Budget	Burns Depo Ex. 556		
560.		STAAR Summary Abilene ISD – Spring 2012	Burns Depo Ex. 560		
561.		STAAR Summary STATEWIDE – Spring 2012	Burns Depo Ex. 561		
1.		2012-13 Adopted Budget Summary			
2.		2012-13 Budget Workshop	FB(Abilene)0067294		
3.		2011-12 Adopted Budget Summary			
4.		Facility Plan	FB(Abilene)0057222- FB(Abilene)0067234		
5.		Impact of Budget Cuts/List of Items or Programs that cannot be provided due to funding	FB(Abilene)000477 FB(Abilene)000485		
6.		Affidavit of Heath Burns			
7.		Dr. Heath Burns Vita			
8.		Abilene ISD CAFR 2010-11	FB(Abilene)0067122- FB(Abilene)0067220		
9.		Abilene ISD CAFR 2009-10	FB(Abilene)0067033- FB(Abilene)0067121		
10.		Abilene ISD CAFR 2008-09	FB(Abilene)0066946- FB(Abilene)0067032		
11.		Abilene ISD CAFR 2007-08	FB(Abilene)0066860- FB(Abilene)0066945		

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
12.		Abilene ISD CAFR 2006-07	FB(Abilene)0066793-FB(Abilene)0066859		
13.		Abilene ISD CAFR 2005-06	FB(Abilene)0066707-FB(Abilene)0066792		
14.		PEIMS Enrollment by Ethnicity – Abilene ISD			
15.		PEIMS Economically Disadvantaged Students – Abilene ISD			
16.		PEIMS Staff Salaries and FTE Counts – Abilene ISD			
17.		School FIRST Rating - Abilene ISD 2010-11			
18.		STAAR Summary Abilene ISD – Summer 2012			

*Aldine ISD*

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
364.		Aldine ISD Slides	Bamberg Depo Ex. 364		
366.		AEIS 2010-11 Aldine ISD	Bamberg Depo Ex. 366		
19.		2012-2013 School District Budget			
20.		Construction Department Special Projects 2012-2013	FB(Aldine)0000019		
21.		Aldine ISD Transportation Capital Improvement Wish List	FB(Aldine)0000020		
22.		Capital Improvement Projects	FB(Aldine)0000021		
23.		Capital Improvement Projects	FB(Aldine)0000022		
24.		Carpets, Gyms, Tennis Courts – Capital Improvement Projects	FB(Aldine)0000023		
25.		Capital Improvement Plan (Future Projects)	FB(Aldine)0000024		
26.		Temporary Buildings	FB(Aldine)0000039		
27.		ACC Meeting	FB(Aldine)0000146		
28.		2010-2011 Budget Additional Recommendation for Budget Cuts Failed Tax Rate Increase	FB(Aldine)0007126		
29.		Transportation Changes Set for 2011-12 School Year	FB(Aldine)0007127		

30.		2011-2012 Transportation Change Re: After-School Activity Runs (XC Runs) for High School and Middle School Students	FB(Aldine)0007128		
31.		Approved Budget Recommendations October 2009	FB(Aldine)0007229		
32.		Fiscal Year 2009-2010 Budget Recommendations October 2009	FB(Aldine)0007229		
33.		Addendum October 20, 2009	FB(Aldine)0007486		
34.		Budget Recommendation for 2011-2012	FB(Aldine)0007490		
35.		Budget Recommendation Approved October 20, 2009	FB(Aldine)0007491		
36.		Budget Recommendations October 2009	FB(Aldine)0007494		
37.		Fiscal Year 2002-2010 Budget Reduction Worksheet New Construction Department Administration	FB(Aldine)0007496		
38.		Fiscal Year 2011-2012 Budget Worksheet New Construction Department	FB(Aldine)0007498		
39.		Recommendations for Magnet Program Closures	FB(Aldine)0007501		
40.		Budget Reductions Approved 10-20-09 for Inactive, Critical Need	FB(Aldine)0007504		
41.		Recommendations for 2011-2012 High School and Middle School Runs	FB(Aldine)0007532		
42.		Recommendations for Magnet Program Closures	FB(Aldine)0007533		
43.		2011-2012 School District Budget	FB(Aldine)0031033		
44.		Staffing Formula	FB(Aldine)0038721		
45.		Principal Budget FY 2012-2013	FB(Aldine)0038727		
46.		Board Approves Tax Rate, calls for tax ratification election	FB(Aldine)0058249		
47.		Finance Update	FB(Aldine)0058258		
48.		Five Year Projection 4-20-09	FB(Aldine)0058259		
49.		2011 Teacher Salary Comparison Report	FB(Aldine)0059751		
50.		Affidavit of Wanda Bamberg			
51.		Aldine ISD CAFR 2010-11			
52.		Aldine ISD CAFR 2009-10			
53.		Aldine ISD CAFR 2008-09			

54.		Aldine ISD CAFR 2007-08			
55.		Aldine ISD CAFR 2006-07			
56.		Aldine ISD CAFR 2005-06			
57.		STAAR Summary Aldine ISD – Spring 2012			
58.		STAAR Summary Aldine – Summer 2012			
59.		PEIMS Enrollment by Ethnicity – Aldine ISD			
60.		PEIMS Economically Disadvantaged Students – Aldine ISD			
61.		PEIMS Staff Salaries and FTE Counts – Aldine ISD			
62.		School FIRST Rating - Aldine ISD 2010-11			
63.		AEIS 2009-10 Aldine ISD			
64.		AEIS 2008-09 Aldine ISD			
65.		AEIS 2007-08 Aldine ISD			
66.		AEIS 2006-07 Aldine ISD			

*Amarillo ISD – Dr. Rod Schroder*

Ex. No.	Date	Description	Barter Range/Depo Exhibit No.	ADMITTED	OBJECTION
919S		Amarillo Slides	Schroder Depo exhibit 919		
920S		AEIS 2006-07 Amarillo ISD	Schroder Depo exhibit 920		
921S		AEIS 2007-08 Amarillo ISD	Schroder Depo exhibit 921		
922S		AEIS 2008-09 Amarillo ISD	Schroder Depo exhibit 922		
923S		AEIS 2009-10 Amarillo ISD	Schroder Depo exhibit 923		
924S		AEIS 2010-11 Amarillo ISD	Schroder Depo exhibit 924		
932S		PEIMS Staff Salaries and FTE Counts 11-12 – Amarillo ISD	Schroder Depo exhibit 932		
933S		PEIMS Staff Salaries and FTE Counts 10-11 – Amarillo ISD	Schroder Depo exhibit 933		
67.		District Building List	FB(Amarillo)0000021-28		
68.		Campus Capacity Survey	FB(Amarillo)0000053-55		
69.		Amarillo ISD Budget Challenges 2011 Frequently Asked Questions	FB(Amarillo)0000056-58		



70.	The Education Dollar in Amarillo ISD 2009-2010 School Year	FB(Amarillo)0000059		
71.	State Funding Reductions for 2011-2013 Biennium	FB(Amarillo)0000082		
72.	Preliminary Report of the AISD Budget Review Committee	FB(Amarillo)0000083-109		
73.	Amarillo ISD Proposed Budget Changes 2011-12 Budget	FB(Amarillo)0000109		
74.	Potential Impact of State Budget Cuts on Amarillo ISD	FB(Amarillo)0000110		
75.	2011-2012 Custodial Staff Reduction Plan Proposal	FB(Amarillo)0000113-122		
76.	Budget Cuts Considered	FB(Amarillo)0000135		
77.	Cost Reductions Since FY 06-07	FB(Amarillo)0000136		
78.	Amarillo Independent School District 2011-2012 Budget	FB(Amarillo)0000193-198		
79.	Amarillo Independent School District 2012-2013 Budget	FB(Amarillo)0000199-204		
80.	Important Fundamental Regarding School Finance and the Situation Facing AISD	FB(Amarillo)0018866-18878		
81.	Tax Election Facts	FB(Amarillo)0018879-18881		
82.	History of Budget Reduction Effects	FB(Amarillo)0018883		
83.	2012-2013 Site Based Budget Allocation	FB(Amarillo)0024220-24225		
84.	Affidavit of Les Hoyt			
85.	Resume of Dr. Rod Schroder			
86.	Amarillo ISD CAFR 2010-11			
87.	Amarillo ISD CAFR 2009-10			
88.	Amarillo ISD CAFR 2008-09			
89.	Amarillo ISD CAFR 2007-08			
90.	Amarillo ISD CAFR 2006-07			
91.	Amarillo ISD CAFR 2005-06			
92.	STAAR Summary Amarillo ISD – Spring 2012			
93.	STAAR Summary Amarillo – Summer 2012			

94.		PEIMS Enrollment by Ethnicity – Amarillo ISD			
95.		PEIMS Economically Disadvantaged Students – Amarillo ISD			
96.		School FIRST Rating - Amarillo ISD 2010-11			

*Austin ISD – Dr. Meria Carstarphen*

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
1722		Austin ISD Slides	Carstarphen Depo Ex. 1722		
1723		AEIS 2010-11 Austin ISD	Carstarphen Depo Ex. 1723		
97.		Austin ISD FY2013 Recommended Budget			
98.		Austin ISD FY2013 Adopted Budget Summary			
99.		Austin ISD FY 2012 Recommended Budget			
100.		Austin ISD Presentation to Board re FY2011-12 Recommended Budget			
101.		AISD Budget Plan, 2011-12			
102.		Austin ISD Presentation to Board re FY2012 Preliminary Budget and Proposed Declaration of Financial Exigency			
103.		2011-12 Teacher Salary Comparison: AISD vs. Urban Districts & Local Districts	FB(Austin)0005855		
104.		Austin ISD History of Class Size Waivers	FB(Austin)0005866		
105.		Austin ISD School/Facility Summary	FB(Austin)0000021		
106.		Austin ISD Portables	FB(Austin)0000132		
107.		Affidavit of Mel Waxler			
108.		Resume of Dr. Meria Carstarphen			
109.		Austin ISD CAFR 2010-11			
110.		Austin ISD CAFR 2009-10			
111.		Austin ISD CAFR 2008-09			
112.		Austin ISD CAFR 2007-08			
113.		Austin ISD CAFR 2006-07			
114.		Austin ISD CAFR 2005-06			
115.		STAAR Summary Austin ISD – Spring 2012			

116.		STAAR Summary Austin – Summer 2012		
117.		PEIMS Enrollment by Ethnicity – Austin ISD		
118.		PEIMS Economically Disadvantaged Students – Austin ISD		
119.		PEIMS Staff Salaries and FTE Counts – Austin ISD		
120.		School FIKS Rating - Austin ISD 2010-11		
121.		AEIS 2009-10 Austin ISD		
122.		AEIS 2008-09 Austin ISD		
123.		AEIS 2007-08 Austin ISD		
124.		AEIS 2006-07 Austin ISD		

*Corsicana ISD*

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
368		Corsicana ISD Slides	Frost Depo Ex. 368		
369		AEIS 2010-11 Corsicana ISD	Frost Depo Ex. 369		
370		AEIS 2005-06 Corsicana ISD	Frost Depo Ex. 370		
371		AEIS 2006-07 Corsicana ISD	Frost Depo Ex. 371		
372		AEIS 2007-08 Corsicana ISD	Frost Depo Ex. 372		
373		AEIS 2008-09 Corsicana ISD	Frost Depo Ex. 373		
374		AEIS 2009-10 Corsicana ISD	Frost Depo Ex. 374		
386		PEIMS Staff Salaries and FTE Counts 10-11 – Corsicana ISD	Frost Depo Ex. 386		
387		PEIMS Staff Salaries and FTE Counts 11-12 – Corsicana ISD	Frost Depo Ex. 387		
125.		Adopted Budget 11-12 Corsicana ISD Official Budget 2011-2012			
126.		Adopted Budget 2012-2013 Adopted Budget for Corsicana ISD August 29, 2012			
127.		Cost Summary – Capital improvement Affidavit of Michael Nielsen	FB(Corsicana)0000102		
128.		Corsicana ISD CAFR 2010-11			
130.		Corsicana ISD CAFR 2009-10			
131.		Corsicana ISD CAFR 2008-09			

132.		Corsicana ISD CAFR 2007-08		
133.		Corsicana ISD CAFR 2006-07		
134.		Corsicana ISD CAFR 2005-06		
135.		STAAR Summary Corsicana ISD – Spring 2012		
136.		STAAR Summary Corsicana – Summer 2012		
137.		PEIMS Enrollment by Ethnicity – Corsicana ISD		
138.		PEIMS Economically Disadvantaged Students – Corsicana ISD		
139.		School FIRST Rating – Corsicana ISD 2010-11		

*Duncanville ISD*

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
1703		Duncanville ISD Slides	Ray Depo Ex. 1703		
1704		Teacher Salary Schedule Comparisons 2010-2011	Ray Depo Ex. 1704		
1706		AEIS 2010-11 Duncanville ISD	Ray Depo Ex. 1706		
1707		AEIS 2009-10 Duncanville ISD	Ray Depo Ex. 1707		
1708		AEIS 2008-09 Duncanville ISD	Ray Depo Ex. 1708		
1709		AEIS 2007-08 Duncanville ISD	Ray Depo Ex. 1709		
1710		AEIS 2006-07 Duncanville ISD	Ray Depo Ex. 1710		
1711		AEIS 2005-06 Duncanville ISD	Ray Depo Ex. 1711		
1716		PEIMS Staff Salaries and FTE Counts – Duncanville ISD	Ray Depo Ex. 1716		
140.		Duncanville ISD 2011-2012 Adopted Budget	FB(Duncanville)0004429		
141.		Duncanville ISD 2012-2013 Adopted 10 Month Budget			
142.		Public Meeting to Discuss 2011-2012 Proposed Budget and Proposed Tax Rate August 22, 2011	FB(Duncanville)0000045		
143.		Summary of Budget Amendments/Transfers October 17, 2011	FB(Duncanville)0000088		
144.		Roof Replacement Proposed	FB(Duncanville)0000029		

145.		DISD Facilities Plumbing Appliances Retrofit	FB(Duncanville)0000030		
146.		Electrical Lighting Retrofit – Proposed	FB(Duncanville)0000031		
147.		HVAC Replacement Proposed	FB(Duncanville)0000032		
148.		Parking Lot Replacement Proposed	FB(Duncanville)0000032		
149.		2005 Bond Issuance Impact on Taxpayer	FB(Duncanville)0000034		
150.		Duncanville ISD Calls for Bond Issuance Accelerated growth creates need for more classroom space	FB(Duncanville)0000035		
151.		DISD Staffing Formulas – MS 11-12-Kennemer Middle School Allocations for 2011-2012 School Year	FB(Duncanville)0004737		
152.		Elementary School Staffing Standards and Guidelines 2012-2013	FB(Duncanville)0004740		
153.		Duncanville ISD Special Election Called Early Voting is September 22-October 3	FB(Duncanville)0006225		
154.		Planning for the Future Tax Ratification Election Called for October 7	FB(Duncanville)0006227		
155.		Duncanville Voters Send Messages to State Leaders: System Needs to be Fixed	FB(Duncanville)0006238		
156.		Impacting the Community	FB(Duncanville)0006275		
157.		Executive Summary Regarding Tax Rate Election	FB(Duncanville)0006311		
158.		Affidavit of Alfred Ray			
159.		Duncanville ISD CAFR 2010-11			
160.		Duncanville ISD CAFR 2009-10			
161.		Duncanville ISD CAFR 2008-09			
162.		Duncanville ISD CAFR 2007-08			
163.		Duncanville ISD CAFR 2006-07			
164.		Duncanville ISD CAFR 2005-06			
165.		STAAR Summary Duncanville ISD – Spring 2012			
166.		STAAR Summary Duncanville – Summer 2012			
167.		PEIMS Enrollment by Ethnicity – Duncanville ISD			
168.		PEIMS Economically Disadvantaged Students – Duncanville ISD			

169.	School FIRST Rating - Duncanville ISD 2010-11		
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*Fort Bend ISD – Dr. Tracy Hoke*

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
664		Fort Bend Slides	Hoke Depo Ex. 664		
665		FBISD A Global Tomorrow	Hoke Depo Ex. 665		
667		AEIS 2010-11 Fort Bend ISD	Hoke Depo Ex. 667		
668		Notice of Public Meeting – Budget and Proposed Tax Rate	Hoke Depo Ex. 668		
669		2007 Fort Bend ISD Bond Referendum	Hoke Depo Ex. 669		
670		FBISD Construction Update	Hoke Depo Ex. 670		
672		AEIS 2005-06 Fort Bend ISD	Hoke Depo Ex. 672		
673		AEIS 2006-07 Fort Bend ISD	Hoke Depo Ex. 673		
674		AEIS 2007-08 Fort Bend ISD	Hoke Depo Ex. 674		
675		AEIS 2008-09 Fort Bend ISD	Hoke Depo Ex. 675		
676		AEIS 2009-10 Fort Bend ISD	Hoke Depo Ex. 676		
677		AEIS 2010-11 Fort Bend ISD	Hoke Depo Ex. 677		
679		Staffing Review	Hoke Depo Ex. 679		
680		2010-2011 Budget	Hoke Depo Ex. 680		
681		Fort Bend Independent School District 2011-2012 Adopted Budget	Hoke Depo Ex. 681		
682		Fort Bend Independent School District 2012-13 Adopted Budget			
683		Budget Workshop May 7, 2012	Hoke Depo Ex. 682		
684		Budget Hearing May 23, 2012	Hoke Depo Ex. 683		
689		STAAR Summary Fort Bend ISD – Spring 2012	Hoke Depo Ex. 684		
170.		Elementary School Long Range Plan: Fall 2012	Hoke Depo Ex. 689		
171.		High School Long Range Plan: Fall 2012	FB(Fort Bend)0011994		
172.		Middle School Long Range Plan: Fall 2012	FB(Fort Bend)0011995		
173.		Temporary Buildings	FB(Fort Bend)0011996		
174.		Fort Bend ISD Campus Budget Allocation	FB(Fort Bend)0011997		
		Resolution of the Fort Bend ISD Board of Trustees March 8, 2019	FB(Fort Bend)0058107		
175.			FB(Fort Bend)0058652-58653		

176.	Resolution	FB(Fort Bend)0058662-58665		
177.	Fort Bend ISD Budgetary Reduction Master Plan	FB(Fort Bend)0058667		
178.	2011/12 Master Reduction Listing by Tier	FB(Fort Bend)0058676		
179.	Proposed new school start/stop times and changes to bus transportation services aimed at reducing FBISD budget costs	FB(Fort Bend)0062311		
180.	District begins reduction in force process	FB(Fort Bend)0062315		
181.	Fort Bend ISD Budget/Reduction in Force Update	FB(Fort Bend)0062324		
182.	FBISD State and Local Revenue	FB(Fort Bend)0062340		
183.	2011 Budget Challenges	FB(Fort Bend)0062434		
184.	Fort Bend ISD Historical Budget Summary	FB(Fort Bend)0062437		
185.	Elementary School Staffing Standards and Guidelines 2012-13	FB(Fort Bend)0069960		
186.	High School Staffing Standards and Guidelines 2010/11	FB(Fort Bend)0069962		
187.	Middle School Staffing Standards and Guidelines 2010-22	FB(Fort Bend)0069965		
188.	Affidavit of Tracy Hoke			
189.	Resume of Tracy Hoke			
190.	Fort Bend ISD CAFR 2010-11			
191.	Fort Bend ISD CAFR 2009-10			
192.	Fort Bend ISD CAFR 2008-09			
193.	Fort Bend ISD CAFR 2007-08			
194.	Fort Bend ISD CAFR 2006-07			
195.	Fort Bend ISD CAFR 2005-06			
196.	STAAR Summary Fort Bend ISD – Summer 2012			
197.	PEIMS Enrollment by Ethnicity – Fort Bend ISD			
198.	PEIMS Economically Disadvantaged Students – Fort Bend ISD			
199.	PEIMS Staff Salaries and FTE Counts – Fort Bend ISD			
200.	School FIRST Rating – Fort Bend ISD 2010-11			

*Humble ISD – Dr. Guy Sconzo*

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
473.		Humble ISD Slides	Sconzo Depo Ex. 473		
474.		AEIS 2010-11 Humble ISD	Sconzo Depo Ex. 474		
475.		AEIS 2009-10 Humble ISD	Sconzo Depo Ex. 475		
476.		AEIS 2008-09 Humble ISD	Sconzo Depo Ex. 476		
477.		AEIS 2007-08 Humble ISD	Sconzo Depo Ex. 477		
478.		AEIS 2006-07 Humble ISD	Sconzo Depo Ex. 478		
479.		Humble ISD CAFR 2010-11	Sconzo Depo Ex. 479		
201.		2011-12 Budget Adoption	FB(Humble)0017411-17417		
202.		2012-13 Budget Adoption	FB(Humble)0017418-17424		
203.		Humble I.S.D. Staffing Guidelines	FB(Humble)0021701-21703		
204.		Humble I.S.D 2012-13 Summary of Formulas/Staffing Standards for Special Education	FB(Humble)0021704-21706		
205.		Humble Independent School District Budget Reductions 2002-03 through 2011-12	FB(Humble)0003228-331		
206.		Tax Rate Rollback Election	FB(Humble)0023259-23264		
207.		Teacher Salary Comparisons 2011-12			
208.		2011-2012 Requests for Maximum Class Size Exception	FB(Humble)0022142-22144		
209.		Master Project List as of July 15, 2012	FB(Humble)0000006		
210.		Portable Building Locations 2011-12	FB(Humble)0000007		
211.		Affidavit of Carol Atwood			
212.		Dr. Guy Sconzo Vita			
213.		Humble ISD CAFR 2009-10			
214.		Humble ISD CAFR 2008-09			
215.		Humble ISD CAFR 2007-08			
216.		Humble ISD CAFR 2006-07			
217.		Humble ISD CAFR 2005-06			



218.		STAAR Summary Humble ISD – Spring 2012		
219.		STAAR Summary Humble ISD – Summer 2012		
220.		PEIMS Enrollment by Ethnicity – Humble ISD		
221.		PEIMS Economically Disadvantaged Students – Humble ISD		
222.		PEIMS Staff Salaries and FTE Counts – Humble ISD		
223.		School FIRST Rating – Humble ISD 2010-11		

*Northside ISD<sup>1</sup>*

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
224.		Final Amended Budget, School Year 2011-12			
225.		Northside Independent School District Proposed Budget, Fiscal Year 2012-13			
226.		Budget Summary 2012-13			
227.		Campus Formula Sample Calculations	FB(Northside)0000286-288		
228.		Board of Trustees Budget Review	FB(Northside)0004891-4906		
229.		Base Budget Reduction Considerations	FB(Northside)0004907-4909		
230.		9% Reduction in Target Revenue	FB(Northside)0004910-4911		
231.		2011-12 Secondary Class Size Report	FB(Northside)0010530-10541		
232.		RE: 2011-12 Secondary Class Size Preview	FB(Northside)0010542-10545		
233.		2012-13 Campus Capacity Information	FB(Northside)0003199-3201		
234.		2012 Portable Building Inventory	FB(Northside)0003202-3207		

<sup>1</sup> The deposition of John Folks, former superintendent for Northside ISD, had not yet taken place. The Fort Bend ISD Plaintiffs reserve the right to update this exhibit list based on that deposition, which is being held on Tuesday, October 16, 2012.

235.	School Bond 2007 Northside ISD	FB(Northside)0003214-3232		
236.	Finance and Taxes: Bond Impact January 23, 2010	FB(Northside)0003233-3261		
237.	Proposed Project Detailed Summary – School Bond 2010	FB(Northside)0003262-3266		
238.	Affidavit of Brian T. Woods			
239.	Northside ISD CAFR 2010-11	FB(Northside)0007273-7479		
240.	Northside ISD CAFR 2009-10	FB(Northside)0007892-8089		
241.	Northside ISD CAFR 2008-09	FB(Northside)0007690-7891		
242.	Northside ISD CAFR 2007-08	FB(Northside)0006862-7067		
243.	Northside ISD CAFR 2006-07	FB(Northside)0007273-7479		
244.	Northside ISD CAFR 2005-06	FB(Northside)0007480-7689		
245.	STAAR Summary Northside ISD – Spring 2012			
246.	STAAR Summary Northside – Summer 2012			
247.	PEIMS Enrollment by Ethnicity – Northside ISD			
248.	PEIMS Economically Disadvantaged Students – Northside ISD			
249.	PEIMS Staff Salaries and FTE Counts – Northside ISD			
250.	School FIRST Rating - Northside ISD 2010-11			
251.	AEIS 2010-11 Northside ISD			
252.	AEIS 2009-10 Northside ISD			
253.	AEIS 2008-09 Northside ISD			
254.	AEIS 2007-08 Northside ISD			
255.	AEIS 2006-07 Northside ISD			

*Waco ISD*

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
530		Waco ISD Slides	Cain depo exhibit 530		
531		AFIS 2005-06 Waco ISD			
532		AEIS 2006-07 Waco ISD			
533		AEIS 2007-08 Waco ISD			
534		AEIS 2008-09 Waco ISD			
535		AEIS 2009-10 Waco ISD			
536		AEIS 2010-11 Waco ISD			
256.		Assessment of Portable Classrooms	FB(Waco)0008332		
257.		2012-13 Campus Non-Payroll Allocations	FB(Waco)0117685		
258.		Title 1 Plus Choice	FB(Waco)0117686		
259.		Overview of the 2012-2013 Preliminary General Bond Fund Budget	FB(Waco)0117710		
260.		2010-2011 Budget Update April 15, 2010	FB(Waco)0117711		
261.		2010-2011 Budget Update May 19, 2010	FB(Waco)0117723		
262.		2010-2011 Proposed Budget August 12, 2010	FB(Waco)0117738		
263.		Budget Update February 17, 2011	FB(Waco)0117749		
264.		Budget Update March 17, 2011	FB(Waco)0117773		
265.		WISD Budget Update May 19, 2011	FB(Waco)0117783		
266.		WISD Budget Update July 21, 2011	FB(Waco)0117797		
267.		WISD Budget Update August 18, 2011	FB(Waco)0117811		
268.		Budget Update Board Workshop February 14, 2012	FB(Waco)0117826		
269.		Budget Update Board Workshop March 22, 2012	FB(Waco)0117844		
270.		Budget Update Board Workshop May 17, 2012	FB(Waco)0117859		
271.		Budget Update Board Workshop June 14, 2012	FB(Waco)0117871		
272.		Budget Update Board Workshop July 19, 2012	FB(Waco)0117879		
273.		Texas School Funding Crisis and the Impact on WISD	FB(Waco)0117890		

274.	Texas School Funding and The Impact on WISD Consolidation Recommendation February 14, 2012	FB(Waco)0117901		
275.	Texas School Funding Crisis and the Impact on WISD January/February 2012	FB(Waco)0117939		
276.	Reductions Implemented in the 2011-12 General Fund Budget	FB(Waco)0117971		
277.	Waco ISD Budget Reduction Feedback 2011	FB(Waco)0117973		
278.	Major Improvements and Repairs Five Year Plan 2011-2016	FB(Waco)0118631		
279.	Painting Schedule 10 Year Cycle	FB(Waco)0118642		
280.	2011-2012 Request for Maximum Class Size Exception	FB(Waco)0119051		
281.	Compensation Plan Design Waco Independent School District Executive Summary	FB(Waco)0124255		
282.	Affidavit of Bonny Cain			
283.	Waco ISD CAFR 2010-11	FB(Waco)0117609		
284.	Waco ISD CAFR 2009-10	FB(Waco)0117519		
285.	Waco ISD CAFR 2008-09	FB(Waco)0117443		
286.	Waco ISD CAFR 2007-08	FB(Waco)0117367		
287.	Waco ISD CAFR 2006-07	FB(Waco)0117291		
288.	Waco ISD CAFR 2005-06	FB(Waco)0117222		
289.	STAAR Summary Waco ISD – Spring 2012			
290.	STAAR Summary Waco – Summer 2012			
291.	PEIMS Enrollment by Ethnicity – Waco ISD			
292.	PEIMS Economically Disadvantaged Students – Waco ISD			
293.	PEIMS Staff Salaries and FTE Counts – Waco ISD			
294.	School FIRST Rating – Waco ISD 2010-11			

*Weatherford ISD*

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
641		Weatherford ISD Slides	Hanks depo ex 641		

642	Comparison of Teacher Salaries in the Western Metroplex	Hanks depo ex 641		
643	AEIS 2010-11 Weatherford ISD	Hanks depo ex 643		
645	AEIS 2006-07 Weatherford ISD	Hanks depo ex 645		
646	AEIS 2007-08 Weatherford ISD	Hanks depo ex 646		
647	AEIS 2008-09 Weatherford ISD	Hanks depo ex 647		
648	AEIS 2009-10 Weatherford ISD	Hanks depo ex 648		
656	Budget Summary 2012-13	Hanks depo ex 656		
657	Weatherford ISD Proposed Budget 2012-13	Hanks depo ex 657		
662	STAAR Summary Weatherford ISD – Spring 2012	Hanks depo ex 662		
663	STAAR Summary Weatherford ISD – Summer 2012	Hanks depo ex 663		
295.	AEIS Total Operating Expenditures per Student			
296.	Capital Needs	FB(Weatherford)0000003		
297.	2010-2011 Budget Reduction Options	FB(Weatherford)00000040		
298.	Update on 2010-2011 Budget Why you should keep the faith	FB(Weatherford)00000051		
299.	Suggested Reductions for 2010-2011	FB(Weatherford)00000028		
300.	Texas: The State of Public School Finance	FB(Weatherford)00000079		
301.	Board Agenda Items	FB(Weatherford)00000021		
302.	Weatherford ISD Staff Allocation Guidelines – Elementary School	FB(Weatherford)00000025		
303.	Weatherford ISD Staff Allocation Guidelines – Middle School	FB(Weatherford)00000026		
304.	Weatherford ISD Staff Allocation Guidelines – High School	FB(Weatherford)00000027		
305.	Board Agenda Item	FB(Weatherford)00000011		

306.	Teacher Salary Comparison Market Analysis Report 2004-2006	FB(Weatherford)0000509		
307.	Budget Workshop August 7, 2012	FB(Weatherford)0008306		
308.	Affidavit of Jeffrey M. Hanks			
309.	Weatherford ISD CAFR 2010-11			
310.	Weatherford ISD CAFR 2009-10			
311.	Weatherford ISD CAFR 2008-09			
312.	Weatherford ISD CAFR 2007-08			
313.	Weatherford ISD CAFR 2006-07			
314.	Weatherford ISD CAFR 2005-06			
315.	PEIMS Enrollment by Ethnicity – Weatherford ISD			
316.	PEIMS Economically Disadvantaged Students – Weatherford ISD			
317.	PEIMS Staff Salaries and FTE Counts – Weatherford ISD			
318.	School FIRST Rating - Weatherford ISD 2010-11			

*Expert – Daniel T. Casey*

Ex. No.	Date	Description	Bates Range/Def's Exhibit No.	ADMITTED	OBJECTION
1327.		Casey Resume	FB0001344- FB0001345		
1328.		Casey Amended Report – “Texas School Finance System: Weights, Allotments, and Funding for Facilities”	FB0003740- FB0003770		
319.		Casey Report Appendices	FB0001343- FB0001875		

*Expert – William D. Duncombe*

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
1142.		Duncombe Report – “Estimating the Cost of Meeting Student Performance Standards in Texas School Districts”	FB0002276-FB0002333		
1143.		Duncombe Supplemental Report – “Estimating the Cost of Meeting Student Performance Standards in Texas School Districts: Supplemental Report”	FB0003145-FB0003193		
320.		Duncombe Vita – January 2012	FB0002335-FB0002352		

*Expert – Lynn M. Moak*

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
1334.		Moak Report – “Performance and Funding Issues: Texas 2012”	FB0000446-FB0000518		
1336.		Moak Supplemental Report One – “Second Administration Analyses”	FB0003555-FB0003602		
1339.		Moak Supplemental Report Two – “FAST Analyses”	FB0003603-FB0003730		
1340.		Moak Supplemental Report Three – “Alternative Costs of Adequacy (CORRECTED)”			
321.		Moak Resume	FB0000521-FB0000524		
322.		Moak Appendices	FB0000519-FB0001311		
323.		Revised/Corrected Moak Report			
324.		List of Correction to LMM Report (exhibit 6322)			
325.		Revised/Corrected Moak Supplemental Report One			
326.		Revised/Corrected Moak Supplemental Report Three			
327.		Back-Up Data for Adequacy Comparison in Moak Supplemental Report Three			

328.		Cumulative Exit-Level TAKS Test Passing Rates Compared to 2012 STAAR Results for 9th Grade			
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*Expert – Steve H. Murdock*

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
329.		Murdock Video	FB0002190-FB0002248		
330.		Murdock Report: “Population Changes in Texas, and the United States: Implications for Education and Economic Development” (SLIDES)	FB0001876-FB0002189		
331.		Murdock Supplemental Report: “Demographic and Socioeconomic Change in Texas: Implications for Education and Economic Development”	FB0003000-FB0003144		
332.		Murdock Population Projections	FB0002249		

*Mr. Joe Wisniewski*

Ex. No.	Date	Description	Bates Range/Depo Exhibit No.	ADMITTED	OBJECTION
333.	08/28/2012	Texas School Finance Overview			
334.	08/28/2012	Presentation to the Court of August 28, 2012			