

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

TEXAS TAXPAYER & STUDENT § IN THE DISTRICT COURT OF
FAIRNESS COALITION, ET AL., §
§
PLAINTIFFS, §
§
VS. § TRAVIS COUNTY, TEXAS
§
MICHAEL WILLIAMS, COMMISSIONER §
OF EDUCATION, ET AL., §
§
§ 250TH JUDICIAL DISTRICT
DEFENDANTS.

CONSOLIDATED CASE:

CALHOUN COUNTY INDEPENDENT §
SCHOOL DISTRICT, ET AL., §
PLAINTIFFS, §
§
VS. §
§
MICHAEL WILLIAMS, COMMISSIONER §
OF EDUCATION, ET AL., §
§
§
DEFENDANTS.

**CALHOUN COUNTY ISD PLAINTIFFS'
PROPOSED WITNESS LIST**

The Calhoun County ISD Plaintiffs serve this their Proposed Witness List. *See*
Exhibit "A" attached hereto.

By identifying these witnesses, the Calhoun County ISD Plaintiffs do not waive their right to
object if any other party attempts to offer the witnesses' testimony at trial. The Calhoun County ISD
Plaintiffs expressly reserve the right to amend or supplement this list at any time. The Calhoun
County ISD Plaintiffs further reserve the right to re-designate witnesses as being called live or by
deposition. This Proposed Witness List pertains only to the initial phase of the trial and not to
the bifurcated phase relating to attorney's fees. The Calhoun County ISD Plaintiffs reserve the

right to identify witnesses, including, among others, George Bramblett, to testify regarding any party's claim for attorney's fees at a later time.

Each of the witnesses below is expected to testify in accordance with previous disclosures by the Calhoun County ISD Plaintiffs and may testify on matters for which rebuttal testimony is necessary. Please refer to the Calhoun County ISD Plaintiffs' disclosures in this case, deposition testimony provided in this case by the witnesses designated below, and/or the expert reports submitted by the witnesses in this case.

Respectfully submitted,

Haynes and Boone, LLP

/s/ John W. Turner

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ATTORNEYS FOR THE
CALHOUN COUNTY ISD PLAINTIFFS

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served this 15th day of October, 2012 as provided below:

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/s/ John W. Turner

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EXHIBIT "A"

The Calhoun County ISD Plaintiffs anticipate calling the following witnesses live at trial but reserve the right to withdraw or amend this designation or to re-designate any of these witnesses as witnesses to be called by deposition:

(1) Mr. Billy Wiggins
Superintendent
Calhoun County Independent School District
c/o Haynes and Boone, LLP
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(2) Dr. Rick Reedy
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(3) Dr. Kay Waggoner
Superintendent
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- (4) Dr. James “Kal” Kallison
2002 Port Royal Drive
Austin, TX 78746
- (5) Dr. Allen Odden
Lawrence O. Picus and Associates
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North Hollywood, CA 91601
- (6) Dr. Jacob L. Vigdor
Sanford School of Public Policy
Duke University
176 Rubenstein Hall
Durham NC 27708
- (7) Dr. Stephen Klein
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120 Ocean Park Boulevard, #609
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- (8) Larry Harris
Mason-Dixon Polling & Research
1250 Connecticut Ave, NW
Washington, DC 20036
- (9) Mr. Lynn Moak
Moak, Casey & Associates, LLP
1801 N. Lamar, Suite 202
Austin, Texas 78701
- (10) Dr. Steve H. Murdock
Allyn and Gladys Cline Chair in Sociology
Rice University
6100 S. Main Street
Houston, TX 77005-1892

- (11) Dr. Diane Whitmore Schanzenbach
Professor
School of Education and Social Policy
Northwestern University
Annenberg Hall, Room 205
2120 Campus Drive
Evanston IL 60208
- (12) Dr. W. Steven Barnett
National Institute for Early Education Research
Rutgers, The State University of New Jersey
120 Albany Street, Suite 500
New Brunswick, New Jersey 08901
- (13) Dr. William Duncombe
Center for Policy Research
Maxwell School of Syracuse University
426 Eggers Hall
Syracuse, NY 13244-1020
- (14) Mr. Joe Wisnoski
Moak, Casey & Associates, LLP
1801 N. Lamar, Suite 202
Austin, Texas 78701

The Calhoun County ISD Plaintiffs anticipate calling the following witnesses by deposition but reserve the right to withdraw or amend this designation or to re-designate any of these witnesses as live witnesses:

- (15) Mr. Herb Youngblood
Superintendent
Abernathy Independent School District
- (16) Mr. Joseph Patel
Superintendent
Aransas County Independent School District
- (17) Dr. Stephen Waddell
Superintendent
Lewisville Independent School District
- (18) Ms. Virginia Day
Director, Early Childhood Education
Texas Education Agency
- (19) Mr. Jon Twing
Executive Vice President and Chief Measurement Officer

Pearson

- (20) Mr. Matthew Gaertner
Research Scientist
Pearson
- (21) Ms. Laurie Davis
Vice President, Measurement Services
Pearson
- (22) Ms. Linda Roska
Director, Accountability Research
Texas Education Agency
- (23) Ms. Gloria Zyskowski
Director, Student Assessment
Texas Education Agency
- (24) Mr. Shannon Housson
Director, Division of Performance Reporting
Texas Education Agency
- (25) Ms. Anita Givens
Associate Commissioner, Standards and Programs
Texas Education Agency
- (26) Mr. Rob Coleman
Assistant Director, Fiscal Management Division
Texas Comptroller of Public Accounts
- (27) Mr. Robert Scott
Former Texas Commissioner of Education

The Calhoun County ISD Plaintiffs further reserve the right to call the following witnesses either live or by deposition:

- (28) Any rebuttal or impeachment witnesses
- (29) Any expert or fact witness designated by any other party
- (30) Custodians of records as necessary to authenticate documents
- (31) Any other witness for whom deposition designations have been submitted
- (32) Any other witness for whom final deposition transcripts have not yet been received

Unofficial copy Travis Co. District Clerk Velva Price