

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

TEXAS TAXPAYER & STUDENT
FAIRNESS COALITION, ET AL.,

PLAINTIFFS,

VS.

MICHAEL WILLIAMS, COMMISSIONER
OF EDUCATION, ET AL.,

DEFENDANTS.

CONSOLIDATED CASE:

CALHOUN COUNTY INDEPENDENT
SCHOOL DISTRICT, ET AL.,

PLAINTIFFS,

VS.

MICHAEL WILLIAMS, COMMISSIONER
OF EDUCATION, ET AL.,

DEFENDANTS.

**CALHOUN COUNTY ISD PLAINTIFFS'
DESIGNATION OF DEPOSITION TESTIMONY**

The Calhoun County ISD Plaintiffs file this their Designation of Deposition Testimony.
See Exhibit "A" attached hereto.

The Calhoun County ISD Plaintiffs expressly reserve the right to withdraw any
designated testimony and/or object to any party's use of any designated testimony. The Calhoun
County ISD Plaintiffs also expressly reserve the right to amend or supplement designated
deposition testimony at any time. Depositions are still underway, and final transcripts for several

witnesses have not yet been provided. The Calhoun County ISD Plaintiffs reserve the right to submit deposition transcripts or portions of deposition transcripts for additional witnesses at a later time.

Respectfully submitted,

Haynes and Boone, LLP

/s/ John W. Turner

Mark R. Trachtenberg
State Bar No. 24008169
1221 McKinney St., Suite 2100
Houston, Texas 77010
Telephone: (713) 547-2000
Telecopier: (713) 547-2600

John W. Turner
State Bar No. 24028085
323 Victory Avenue, Suite 700
Dallas, Texas 75218
Telephone: (214) 651-5000
Telecopier: (214) 651-5940

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:

J. Christopher Diamond
The Diamond Law Firm, P.C.
17484 Northwest Freeway
Suite 150
Houston, Texas 77040
Via Email

David G. Hinojosa
Marisa Bono
Mexican American Legal Defense
and Education Fund, Inc.
110 Broadway, Suite 300
San Antonio, Texas 78205
Via Email

Craig T. Enoch
Melissa A. Lorber
Enoch Kever PLLC
600 Congress, Suite 2800
Austin, Texas 78701
Via Email

Shelley N. Dahlberg
James "Beau" Eccles
Erika Kane
Texas Attorney General's Office
P.O. Box 12543, Capitol Station
Austin, Texas 78711
Via Email

Richard E. Gray, III
Toni Hunter
Gray & Becker, P.C.
900 West Ave.
Austin, Texas 78701
Via Email

J. David Thompson, III
Philip Fraissinet
Thompson & Horton LLP
3200 Phoenix Tower, Suite 2000
Houston, Texas 77027
Via Email

Randall B. Wood
Doug W. Ray
Ray & Wood
2700 Bee Caves Road #200
Austin, Texas 78746
Telephone: (512) 328-8877
Fax: (512) 328-1156
Via Email

Robert A. Schulman
Joseph E. Hoffer
Ricardo R. Lopez
Schulman, Lopez & Hoffer, L.L.P.
517 Soledad Street
San Antonio, Texas 78205-1508
Via Email

/s/ John W. Turner

John W. Turner

EXHIBIT "A"

9/17/2012

Barnett-Steven, Ph.D.

4:1-7

35:3-9

9/26/2012

Coleman-Rob

7:6 - 10:2

10:25 - 14:2

14:5 - 18:13

18:16 - 22:17

22:19 - 24:24

25:15 - 26:6

27:4 - 27:18

27:20 - 36:24

37:1 - 38:1

39:1 - 41:20

41:22 - 43:10

43:12 - 43:24

44:1 - 44:20

44:22 - 45:16

55:22 - 57:12

57:14 - 62:3

62:8 - 62:10

62:16 - 63:3

63:25 - 64:19

64:21 - 66:7

66:10 - 69:16

71:12 - 71:17

71:20 - 71:22

71:24 - 72:24

73:3 - 74:1

74:8 - 74:15

75:10 - 75:16

78:1 - 79:18

80:1 - 80:7

80:9 - 81:7

81:9 - 82:7

82:9 - 82:25

83:2 - 83:25

84:2 - 86:6

86:8 - 86:24

88:18 - 89:1

90:11 - 90:16

EXHIBIT "A"

CALHOUN COUNTY ISD PLAINTIFFS'

DESIGNATION OF DEPOSITION TESTIMONY

D-2103309_1

PAGE 4

91:16 - 92:7
94:2 - 94:10
94:11 - 94:14
95:12 - 95:14
95:16 - 95:20
95:22 - 96:2
96:4 - 96:9
96:25 - 98:5
98:9 - 100:6

7/19/2012

Davis-Laurie

5:1 - 5:16
6:3 - 6:11
7:10 - 10:17
14:4 - 27:1
56:4 - 115:7
122:10 - 125:13
126:16 - 132:6

9/26/2012

Day-Virginia

6:1 - 6:3
9:16 - 10:15
10:20 - 11:16
14:11 - 14:25
15:1 - 32:20
33:1 - 61:14
62:1 - 73:17
74:16 - 75:15
76:5 - 82:8
85:12 - 101:8
102:11 - 105:22
106:6 - 109:7
114:16 - 116:3
116:13 - 153:23
154:6 - 162:14

7/19/2012

Gaertner-Matthew, Ph.D.

5:9 - 5:24
7:7 - 10:4
10:18 - 16:11
17:19 - 18:11
18:15 - 20:14
29:16 - 39:1
49:17 - 50:7

9/14/2012

Givens-Anita

9:5 - 9:12
9:14
10:10 - 10:17
10:24 - 12:23
13:20 - 15:22
17:18 - 18:24
19:2 - 21:9
21:12 - 24:3
25:5 - 28:7
28:11 - 28:25
29:3 - 30:15
30:24 - 32:2
32:4 - 33:9
33:14 - 49:3
50:19 - 51:22
51:25 - 53:16
54:6 - 56:12
56:18 - 57:24
58:1 - 71:9
71:14 - 71:19
72:2 - 72:10
73:8 - 83:25
84:16
84:18 - 85:5
85:13 - 87:24
89:9 - 89:15
89:21 - 89:25
90:3 - 90:16
90:18 - 90:23
93:2 - 95:1
95:7 - 96:18
97:13 - 98:15
98:17 - 99:2
99:19 - 123:13
123:23 - 128:3
128:19 - 131:6
133:24 - 134:7
136:8 - 137:4
138:5 - 138:15
146:9 - 146:19
146:22 - 147:15
149:3 - 150:8
152:21 - 153:4

153:13 - 153:24

9/07/2012 **Harris-Lawrence**

5:1-3

5:11-13

48:6-16

7/18/2012 **Housson-Shannon**

7:6 - 7:10

9:9 - 10:8

11:7 - 14:3

17:14 - 20:5

23:7 - 37:25

40:4 - 71:4

71:17 - 81:22

82:25 - 86:1

97:4 - 100:1

115:5 - 115:11

128:1 - 131:13

137:14 - 142:12

166:23 - 171:24

175:24 - 181:11

9/24/2012 **Klein-Stephen, Ph.D.**

6:3 – 6:11

10:11-18

8/8/2012 **Patek-Joseph**

8:1 - 38:15

38:24 - 59:20

60:8 - 60:24

70:18 - 70:21

71:11 - 76:23

79:17 - 81:17

141:21 - 141:24

189:23 - 194:24

196:10 - 202:3

202:5 - 205:10

211:20 - 212:11

8/15/2012 **Reedy-Richard**

8:4 - 8:14

103:8 - 103:16

107:6 - 107:16

113:8 - 115:13
118:11 - 119:18
147:13 - 154:13
159:4 - 159:21
160:5 - 160:22
175:12 - 176:13
198:13 - 202:8

9/25/2012 Roska-Linda

7:9 - 7:11
7:14 - 7:21
8:24 - 11:16
12:22 - 14:25
16:5 - 16:24
19:8 - 34:10
34:13 - 42:17
42:21 - 43:24
44:2 - 52:9
52:22 - 54:20
54:20 - 88:14
91:1 - 91:8
91:21 - 92:21
94:5 - 100:21
105:3 - 107:5
117:3 - 117:9

9/18/2012 Schanzench-Diane, Ph.D.

6:1-8
9:9-11

6/28/2012 (Vol. 1) Scott-Robert

1:1 – 313:18

6/29/0212 (Vol.2) Scott-Robert

321:1 – 475:14

7/12/2012 Twing-Jon, Ph.D

8:6 - 8:18
10:4 - 11:1
28:10 - 32:17
50:16 - 50:22
53:3 - 65:7
123:10 - 125:19

9/25/2012 **Vigdor-Jacob**

7:1-9
14:9-13

9/18/2012 **Waddell-Stephen**

8:5 - 21:2
21:4 - 27:14
27:16 - 28:17
28:19 - 29:13
29:15
29:20 - 50:17
51:22 - 60:17
74:10 - 74:14
94:11 - 94:24
97:25 - 98:2
138:18 - 139:10

9/21/2012 **Waggoner-Dr. Kay**

7:1 - 34:23
34:25 - 67:8
67:17 - 67:22
69:12 - 69:22
125:13 - 125:20
137:18 - 137:20
143:21 - 143:25
144:2 - 147:22

9/12/2012 **Wiggins-William**

7:1 - 74:8
74:14 - 74:22
74:24 - 75:9
75:11 - 75:12
75:14 - 75:22
75:24 - 76:2
76:4 - 76:6
76:8 - 76:24
77:18 - 78:10
78:19 - 79:2
79:14 - 87:1
96:5 - 96:8
99:18 - 101:3
101:18 - 101:21
102:11 - 102:13
109:3 - 109:14

127:9 - 127:19
128:10 - 128:20
175:7 - 176:8

9/20/2012

Youngblood-Herb

6:1 - 57:2
57:15 - 57:20
59:7 - 59:11
71:8 - 71:19
83:6 - 83:25
88:16 - 89:19
131:22 - 132:8
151:16 - 152:1
160:3 - 160:11
163:22 - 163:25
164:6 - 165:16

7/10/2012

Zyskowski-Gloria

1:1 - 274:12

Unofficial copy Travis Co. District Clerk Velva L. Price