

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

TEXAS TAXPAYER & STUDENT  
FAIRNESS COALITION, *ET AL.*,

Plaintiffs,

EDGEWOOD INDEPENDENT SCHOOL  
DISTRICT, *ET AL.*, (consolidated)

Plaintiffs

v.

MICHAEL WILLIAMS, in his official capacity  
as Commissioner of Education, *et al.*,

Defendants,

§ IN THE DISTRICT COURT

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TRAVIS COUNTY, TEXAS

200TH JUDICIAL  
DISTRICT

**EDGEWOOD PLAINTIFFS' DEPOSITION DESIGNATIONS**

Edgewood Independent School District, *et al.*, "Edgewood I.S.D. Plaintiffs") hereby submit the following Deposition Designations. Plaintiffs reserve their right to designate additional deposition testimony from Defendants' witnesses (including but not limited to Rule 30(b)(6) witnesses) who are on Defendants' "may call" witness list, should Defendants later determine that they will not call such witnesses at trial.

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Depositions excerpts will be supplemented once transcript becomes available.

**Deposition of Steven Flores  
Volume I  
October 9, 2012**

Depositions excerpts will be supplemented once transcript becomes available.

**Deposition of Tom Currah  
Volume I  
October 9, 2012**

Depositions excerpts will be supplemented once transcript becomes available.

DATED: October 15, 2012

Respectfully Submitted,  
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Unofficial copy Travis Co. District Clerk Valya L. Price



THE TEXAS TAXPAYER & STUDENT § IN THE DISTRICT COURT  
FAIRNESS COALITION, et al; §  
CALHOUN COUNTY ISD, et al; §  
EDGEWOOD ISD, et al; §  
FORT BEND ISD, et al., §  
§  
Plaintiffs, §  
§  
§  
§  
JOYCE COLEMAN, et al., §  
§  
Intervenors, §  
§  
vs. § TRAVIS COUNTY, TEXAS  
§  
ROBERT SCOTT, COMMISSIONER §  
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CAPACITY; SUSAN COMBS, §  
TEXAS COMPTROLLER OF PUBLIC §  
ACCOUNTS, IN HER OFFICIAL §  
CAPACITY; TEXAS STATE BOARD §  
OF EDUCATION, §  
Defendants. § 200<sup>th</sup> JUDICIAL DISTRICT

**EDGEWOOD PLAINTIFFS' EXHIBIT LIST**

Come now, Edgewood Plaintiffs, Edgewood ISD, et al., and file this Edgewood Plaintiffs' Exhibit List. Edgewood Plaintiffs reserve all rights to amend and supplement the list accordingly.

Exhibit No.	Exhibit	Objection	Identified	Admitted
4000	Expert Report – Cortez & Brief Bio 09-26-2012			
4001	2010 Comprehensive Annual Report on Texas Public Schools – TEA			
4002	ACT Condition of College and Career Readiness 2011			
4003	ACT Profile Report – Texas 2011			

<b>Exhibit No.</b>	<b>Exhibit</b>	<b>Objection</b>	<b>Identified</b>	<b>Admitted</b>
4004	AEIS Report 2009-2010 Abernathy			
4005	AEIS Report 2009-2010 Aldine			
4006	AEIS Report 2009-2010 Harlingen			
4007	AEIS Report 2009-2010 Kingsville			
4008	AEIS Report 2009-2010 La Feria			
4009	AEIS Report 2009-2010 Northside			
4010	AEIS Report 2009-2010 Pasadena			
4011	AEIS Report 2010-211 Abernathy			
4012	AEIS Report 2010-211 Aldine			
4013	AEIS Report 2010-211 Harlingen			
4014	AEIS Report 2010-211 Kingsville			
4015	AEIS Report 2010-211 La Feria			
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4017	AEIS Report 2010-211 Pasadena			
4018	AEIS Report Glossary 2009-2010			
4019	AEIS Report Glossary 2010-2011			
4020	Amarillo Adopted Budget Summary 2010-2011			
4021	Amarillo Adopted budget Summary 2011-2012			
4022	Amarillo Adopted budget Summary 2012-2013			
4023	American Youth Policy Forum, May 2010, Austin Building Capacity for ELLs Issue Brief			
4024	Defendants' Response to Edgewood Plaintiffs' RFA combo			

Exhibit No.	Exhibit	Objection	Identified	Admitted
4025	Edgewood ISD – avg percent correct STAAR 2012			
4026	Edgewood ISD – avg percent correct STAAR EOC 2012			
4027	Edgewood ISD – TAKS average percent correct			
4028	Edgewood ISD – 2009-2010 Annual Financial Report			
4029	Edgewood ISD – 2010-2011 Official Budget			
4030	Edgewood ISD – 2011-12 Class Size Waiver			
4031	Edgewood ISD - 2011-2012 Official Budget			
4032	Edgewood ISD – 2012-2013 Official Budget			
4033	Edgewood ISD 2012-2013 Strategic Staffing Plan			
4034	Edgewood ISD – Board Facilities Committee Meeting 1 of 3			
4035	Edgewood ISD – Board Facilities Committee Meeting 2 of 3			
4036	Edgewood ISD – Board Facilities Committee Meeting 3 of 3			
4037	Edgewood ISD – Budget Cuts Correspondence			
4038	Edgewood ISD – PEIMS Report – Dropout Students by Gender, Ethnicity and Grade			
4039	Evaluation of the Texas Pre-K LEP Program, 2008-2009			
4040	Expert Report – Belfield			
4041	Bill & Melinda Gates Foundation, Austin Independent School District, Grants 2006			
4042	Harlingen CISD – Facilities – <a href="mailto:no_reply@hcisd.org">no_reply@hcisd.org</a> 20120727 11 1738			
4043	Harlingen CISD – Facilities – Portable Buildings			
4044	Harlingen CISD – Facilities – Fire Marshal Reports – Fire Inspection – District Buildings			

<b>Exhibit No.</b>	<b>Exhibit</b>	<b>Objection</b>	<b>Identified</b>	<b>Admitted</b>
4045	Harlingen CISD – Facilities – Fire Marshal Reports – Fire Inspection - Elementary			
4046	Harlingen CISD – Facilities – Fire Marshal Reports – Fire Inspection – Middle Schools			
4047	Harlingen CISD – Facilities – Fire Marshal Reports – Fire Inspection Report – High Schools			
4048	Harlingen CISD Adopted Budget 2010-2011			
4049	Harlingen CISD Class Size Waivers 2010-2011			
4050	Harlingen CISD – Comprehensive Annual Financial Report 2011			
4051	Harlingen CISD – Comprehensive Annual Financial Report 2010			
4052	Izquierdo – Chapter 89 Adaptations for Special Populations			
4053	Izquierdo – Department of Bicultural-Bilingual Studies			
4054	Izquierdo – Educator guide to TELPAS Grades K-12			
4055	La Feria – Grade 11 TAKS			
4056	La Feria – STAAR Results – Grades 3-8			
4057	La Feria AEIS STAAR EOC			
4058	La Feria Budget Cuts			
4059	La Feria Budget Summary 2010-2011			
4060	La Feria budget Summary 2011-2012			
4061	La Feria Budget Summary 2012-2013			
4062	La Feria ISD TAKS v. STAAR EOC Documentation			
4063	La Feria ISD Audit Report – Year Ended August 31 2010			
4064	La Feria ISD Audit Report – year Ended August 31 2011			

<b>Exhibit No.</b>	<b>Exhibit</b>	<b>Objection</b>	<b>Identified</b>	<b>Admitted</b>
4065	La Feria Pay Structures 2011-2012 – teachers			
4066	McAllen Adopted Budget 2010-2011			
4067	McAllen Adopted Budget 2011-2012			
4068	McAllen ISD – Maintenance Operations			
4069	McAllen ISD Comprehensive Annual Financial Report for 2009-2010			
4070	McAllen ISD Comprehensive Annual Financial Report for 2010-2011			
4071	McAllen ISD Teacher Experience & Certification			
4072	McAllen Summary Budget Report 2012-2013			
4073	PEIMS, 2009-2010, 2010-2011 Actual Financial data, Total for State All Districts			
4074	PEIMS, 2009-2010, 2010-2011, 2011-2012 Budget Financial data, Totals for State All Districts			
4075	Pompa Data – NCLEA			
4076	Pompa Data - Snapshot of ELLS in TX			
4077	Pompa Data - To the Administration Addressed from Danielle Diehle			
4078	San Benito ISD – At-risk students			
4079	San Benito ISD – At-risk students			
4080	SBEC – Out-of-Field Teacher Credentials 2008-2010			
4081	TEA 2011 Accountability Ratings			
4082	TEA Best Practices Clearinghouse-High School English as a Second Language Program – Montwood High School			

<b>Exhibit No.</b>	<b>Exhibit</b>	<b>Objection</b>	<b>Identified</b>	<b>Admitted</b>
4083	TEA Best Practices Clearinghouse-Implementing a K-12 Dual Language Enrichment Program – Pharr-San Juan-Alamo ISD			
4084	Secondary School Completion and Dropouts in Texas Public Schools 2010-11			
4085	STAAR EISD March April 2012 Percent Score Grades 3-5			
4086	STAAR EISD May 2012 Elementary			
4087	STAAR EISD May 2012 Middle School			
4088	STAAR EISD Summary Report Spring 2012 Grades 3-8			
4089	STAAR EISD Summary Report Spring 2012 High School			
4090	STAAR EISD Summary Report Summer 2012 High School			
4091	STAAR EOC EISD May 2012 Percent Score			
4092	STAAR EOC EISD Spring 2012 Middle School			
4093	STAAR EOC LFISD Spring 2012 Scores			
4094	STAAR EOC Spring 2012 Raw Score, Phase II and Final Rec Performance Standards			
4095	STAAR HISD Summary Report Spring 2012 Grades 3-8			
4096	STAAR HISD Summary Report Spring 2012 High School			
4097	STAAR HISD Summary Report Summer 2012 High School			
4098	STAAR LFISD Comparison			
4099	STAAR LFISD Summary Report Spring 2012 Grades 3-8			
4100	STAAR LFISD Summary Report Spring 2012 Grades 3-8 continued			
4101	STAAR LFISD Summary Report Spring 2012 High School			

<b>Exhibit No.</b>	<b>Exhibit</b>	<b>Objection</b>	<b>Identified</b>	<b>Admitted</b>
4102	STAAR LFISD Summary Report Summer 2012 High School			
4103	STAAR MISD Summary Report Spring 2012 Grades 3-8			
4104	STAAR MISD Summary Report Spring 2012 Grades 3-8 continued			
4105	STAAR MISD Summary Report Spring 2012 High School			
4106	STAAR SBISD Spring 2012 Grade 3 Report			
4107	STAAR SBISD Spring 2012 Grade 4 Report			
4108	STAAR SBISD Spring 2012 Grade 5 Report			
4109	STAAR SBISD Spring 2012 Grade 6 Report			
4110	STAAR SBISD Spring 2012 Grade 7 Report			
4111	STAAR SBISD Spring 2012 Grade 8 Report			
4112	STAAR SBISD Spring 2012 Summary Report			
4113	STAAR SBISD Summer 2012 Summary Report			
4114	STAAR Statewide Summary Report Spring 2012 English Reading			
4115	STAAR Statewide Summary Report Spring 2012 English Writing			
4116	STAAR Statewide Summary Report Spring 2012 Grade 3			
4117	STAAR Statewide Summary Report Spring 2012 Grade 3L			
4118	STAAR Statewide Summary Report Spring 2012 Grade 3 Spanish			
4119	STAAR Statewide Summary Report Spring 2012 Grade 4			
4120	STAAR Statewide Summary Report Spring 2012 Grade 4L			
4121	STAAR Statewide Summary Report Spring 2012 Grade 4 Spanish			

<b>Exhibit No.</b>	<b>Exhibit</b>	<b>Objection</b>	<b>Identified</b>	<b>Admitted</b>
4122	STAAR Statewide Summary Report Spring 2012 Grade 5			
4123	STAAR Statewide Summary Report Spring 2012 Grade 5L			
4124	STAAR Statewide Summary Report Spring 2012 Grade 5 Spanish			
4125	STAAR Statewide Summary Report Spring 2012 Grade 6			
4126	STAAR Statewide Summary Report Spring 2012 Grade 6L			
4127	STAAR Statewide Summary Report Spring 2012 Grade 7			
4128	STAAR Statewide Summary Report Spring 2012 Grade 7L			
4129	STAAR Statewide Summary Report Spring 2012 Grade 8			
4130	STAAR Statewide Summary Report Spring 2012 Grade 8L			
4131	STAAR Statewide Summary Report Spring 2012 Math			
4132	STAAR Statewide Summary Report Spring 2012 Math L			
4133	STAAR Statewide Summary Report Spring 2012 Science			
4134	STAAR Statewide Summary Report Spring 2012 Science L			
4135	STAAR Statewide Summary Report Spring 2012 Social Studies			
4136	STAAR Statewide Summary Report Spring 2012 Social Studies L			
4137	Schanzenbach – San Benito CISD Class Size Waiver Application 2011-12			
4138	STAAR Statewide Summary Report Summer 2012 English Reading			
4139	STAAR Statewide Summary Report Summer 2012 English Writing			
4140	STAAR Statewide Summary Report Summer 2012 Math			



<b>Exhibit No.</b>	<b>Exhibit</b>	<b>Objection</b>	<b>Identified</b>	<b>Admitted</b>
4141	STAAR Statewide Summary Report Summer 2012 Math L			
4142	STAAR Statewide Summary Report Summer 2012 Science			
4143	STAAR Statewide Summary Report Summer 2012 Science L			
4144	STAAR Summary Report Summer 2012 Social Studies			
4145	STAAR Summary Report Summer 2012 Social Studies L			
4146	TAKS EISD April 2012 Grades 10 and 11 Percent Score			
4147	TEA Best Practices Clearinghouse – Promoting Program Fidelity in Bilingual Model Implementation – Brownsville ISD			
4148	TEA School Finance 101_01142011			
4149	TEA Secondary School Completion and Dropouts 2009-2010 Campus Supplement			
4150	TEA Secondary School Completion and Dropouts 2009-2010 County Supplement			
4151	TEA Secondary School Completion and Dropouts 2009-2010 District Supplement			
4152	TEA, Accountability Research, Grade-Level Retention 2009-2010			
4153	TEA, Educator Guide to TELPAS, Grades K-12			
4154	NAEP NJ Achievement Growth Data Mathematics 2009-2011			
4155	NAEP NJ Achievement Growth Data Reading 2009-2011			
4156	NAEP NJ Mathematics Snapshot Grade 4 2011			
4157	NAEP NJ Mathematics Snapshot Grade 8 2011			
4158	NAEP NJ Reading Snapshot Grade 4 2011			
4159	NAEP NJ Reading Snapshot Grade 8 2011			

<b>Exhibit No.</b>	<b>Exhibit</b>	<b>Objection</b>	<b>Identified</b>	<b>Admitted</b>
4160	TEA, Texas Educator Certification Preparation Manual - Bilingual Generalist EC-6c			
4161	TEA, Texas Educator Certification Preparation Manual – English as a Second Language – Generalist EEC-6			
4162	TEA, Texas Educator Certification Preparation Manual – TexES Generalist EC-6			
4163	TELPAS EISD Spring 2010 Summary Report			
4164	TELPAS EISD Spring 2011 Summary Report			
4165	TELPAS EISD Spring 2012 Summary Report			
4166	TELPAS HISD Spring 2010 Summary Report			
4167	TELPAS HISD Spring 2011 Summary Report			
4168	TELPAS HISD Spring 2012 Summary Report			
4169	TELPAS LFISD Spring 2011 Summary Report			
4170	TELPAS LFISD Spring 2012 Summary Report			
4171	TELPAS MISD Spring 2010 Summary Report			
4172	TELPAS MISD Spring 2011 Summary Report			
4173	TELPAS MISD Spring 2012 Summary Report			
4174	TELPAS SBISD Spring 2010 Summary Report			
4175	TELPAS SBISD Spring 2011 Summary Report			
4176	TELPAS SBISD Spring 2012 Summary Report			
4177	TELPAS Statewide Summary Report Spring 2009			
4178	TELPAS Statewide Summary Report Spring 2010			
4179	TELPAS Statewide Summary Report Spring 2011			

<b>Exhibit No.</b>	<b>Exhibit</b>	<b>Objection</b>	<b>Identified</b>	<b>Admitted</b>
4180	TELPAS Statewide Summary Report Spring 2012			
4181	Whitehurst – Rethinking the federal role in education – Should Washington do whatever it takes			
4182	Lopez 2005 Exec Order 53			
4183	Lopez 2006 HB1 Enrolled			
4184	Lopez 2006 SB1031 enrolled			
4185	Lopez 2009 HB3 Enrolled			
4186	Lopez 2011 HB2135 enrolled			
4187	Lopez – Article – social-promotion-change may doom school acctblty bill_ Stutz (2009)			
4188	Lopez – Article – New Standardized testing draws support & criticism_ Parker (2012)			
4189	TEA (2010d) HB3-All Transition Plan			
4190	TEA (2011) STAAR – 2011 – Nov Update			
4191	TEA (2012a) STAAR – Q and A			
4192	TEA News release – deferring 15 percent grading policy (2012)			
4193	TEA (2010c) Overview of State Assessment Program			
4194	TEA (2010h) 19 – Tex Admin Code – ch74_e – 2004-05			
4195	TEA (2010i) 18 – Tex Admin Code – ch74_f – 2007-08			
4196	Cortez – AG_Worklife_June 26 2012			
4197	Cortez – Arizona English Language Learner Cost Study			
4198	Cortez – Adequacy estimates and the implications of common standards for the cost of instruction			

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4199	Cortez Data – Costing Out the Resources needed to Meet Colorado Education Standards and Requirements			
4200	Cortez Data – Study on the Distribution of Teacher Quality in Texas Schools			
4201	Defendants Expert – Dawn-Fisher – 2012.10.02 LDF master dataset with charters for report			
4202	Defendants Expert – Dawn-Fisher – 2012 09 20 LDF Master Dataset for Report 2			
4203	Schanzenbach – Molnar et al. – Evaluating the SAGE Program A Pilot Program in Targeted Pupil-Teacher Reduction in Wisconsin			
4204	Schanzenbach – Mosteller – The Tennessee Study of Class Size in the Early School Grades			
4205	Schanzenbach – Chetty et al – How Does Your Kindergarten Classroom Affect Your Earnings			
4206	Schanzenbach – Dallas Morning News – Waivers to Texas class size law triple, thanks to funding cuts			
4207	Schanzenbach – Edgewood ISD – Report on Employees (Name and Employee number redacted)			
4208	Barnett – Texas Early Childhood Profile			
4209	Belfield – The Fiscal Impacts of College Attainment			
4210	Harlingen CISD Adopted Budget 2011-2012			
4211	Belfield - Colorado School Finance Report			
4212	San Benito CISD 2009-2010 Annual Financial and Compliance Report			
4213	San Benito CISD 2010-2011 Annual Financial and Compliance Report			

<b>Exhibit No.</b>	<b>Exhibit</b>	<b>Objection</b>	<b>Identified</b>	<b>Admitted</b>
4214	Edgewood ISD – TAKS v. EOC Remediation – Compilation Data by District			
4215	Harlingen CISD – TAKS v. EOC Remediation – Compilation Data by District			
4216	McAllen ISD – TAKS v. EOC Remediation – Compilation Data by District			
4217	San Benito CISD – TAKS v. EOC Remediation – Compilation Data by District-4			
4218	La Feria ISD – TAKS v. EOC Remediation – Compilation Data by District			
4219	Texas Association of School Boards, HR Exchange – February 2012			
4220	[CONFIDENTIAL] – School Record of Minor Child B. Romero			
4221	[CONFIDENTIAL] – School Record of Minor Child G. Romero			
4222	Barnett – The effects of preschool education			
4223	Barnett – Effectiveness of early educational intervention			
4224	Edgewood Plaintiffs' Deposition Designations			

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