

IN THE DISTRICT COURT

Plaintiffs

VS.

200th JUDICIAL DISTRICT

MICHAEL L. WILLIAMS, COMMISSIONER §
OF EDUCATION, IN HIS OFFICIAL §
CAPACITY, et al. §

Defendants.

TRAVIS COUNTY, TEXAS

**EFFICIENCY INTERVENORS' OBJECTIONS TO EXHIBITS AND OBJECTIONS
AND COUNTER-OFFERS TO DEPOSITION EXCERPTS**

In response to exhibits and deposition excerpts offered by the parties in this case, the Efficiency Intervenor provides the following objections:

TEXAS TAXPAYER & STUDENT FAIRNESS COALITION'S EXHIBITS

The Efficiency Intervenor's object to the admission of discovery responses as they are not proper exhibits, they are hearsay, or hearsay within hearsay, and no predicate has been laid for their admission – 3210 (Intervenor's Answers to TTSFC Interrogatory Nos. 16, 17, 18, 20).

CALHOUN COUNTY EXHIBITS

The Efficiency Intervenors object to the admission of Efficiency Intervenors' discovery responses as they are not proper exhibits, they are hearsay, or hearsay within hearsay, and no predicate has been laid for their admission – 5637, 5638, 5641, 5645, 5646.

EDGEWOOD EXHIBITS

Efficiency Intervenor object to the following exhibits—

4000 (IDRA Expert Report)hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4222 (Barnett Report/Article)hearsay, hearsay within hearsay, and no predicate laid for
its admission, not an expert report

4223 (Barnett Report/Article)hearsay, hearsay within hearsay, and no predicate laid for
its admission, not an expert report

4023 (Article – American Youth Policy Forum) hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4187 (Lopez article) hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4188 (Lopez article) hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4197 (Cortez article/study) hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4199 (Cortez Colorado data) hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4200 (Cortez article/report) hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4203 (Schanzenbach – article) hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4204 (Schanzenbach – article) hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4205 (Schanzenbach – article) hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4206 (Schanzenbach – article) hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4207 (Schanzenbach – article) hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4208 (Schanzenbach – article) hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4209 (Schanzenbach – article) hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4225 (IDRA Report) hearsay, hearsay within hearsay, and no predicate laid for its admission, not an expert report

4226 (Supporting data) hearsay, no predicate

EDGEWOOD DEPOSITION EXCERPTS

Allan Parker

6:25-7:11 -- Objection: optional completeness - offer 7:12-9:19
9:21-24 -- Objection: optional completeness - offer 9:25-10:21
16:16-17:3 -- Objection: optional completeness - offer 17:4-10
93:11-14 -- Objection: optional completeness - offer 93:15-24
146:25-147:8 -- Objections: assumes facts not in evidence, failure to lay a proper predicate, vague, incomplete hypothetical.
147:11-13 -- Objection: optional completeness – offer 147:9-148:19

Efficiency Intervenors' counter-offer: Efficiency Intervenors plan to call Allan Parker to testify live at trial. To the extent that Edgewood offers the above out-of context excerpts, the Efficiency Intervenors hereby offer the following: 6:7-175:13.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on the 19th day of October 2012 a true and correct copy of the above and foregoing has been served by email on the following:

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/s/

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