

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.

IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

250TH JUDICIAL DISTRICT

**CALHOUN COUNTY ISD PLAINTIFFS'
OBJECTIONS TO DEPOSITION DESIGNATIONS**

The Calhoun County ISD Plaintiffs file this their Objections to the Designations of Deposition Testimony (the "Designations") proposed by other parties in this case. *See* Exhibit "A" attached hereto.

The Calhoun County ISD Plaintiffs expressly reserve the right to amend, supplement, and/or withdraw any objections to any party's designated testimony. The Calhoun County ISD Plaintiffs also incorporate herein by reference their Designation of Deposition Testimony filed in this matter.

Respectfully submitted,

Haynes and Boone, LLP

/s/ John W. Turner

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EXHIBIT "A"

DEFENDANTS		
Witness	Page/Line Designation	Objection / Counter-Designations
Knight, J. (8/09/12)	98:6 – 272:8	72:12-75:19 76:6-78:17 78:23-81:18 81:20-85:17 85:20-86:1 86:3-86:18 86:20-86:25 87:5-87:20 87:25-93:4 93:16-93:20 93:22-94:2 94:4-97:20 311:21-312:13 312:18-312:24 313:5-315:23
Patek (8/08/12)	81:23 - 174:9	Optional Completeness: Please refer to the Calhoun County ISD Plaintiffs' Designation of Deposition Testimony, which is incorporated herein for all purposes.
	208:11 - 211:17	
Reedy (8/15/12)	85:2 – 182:11	Optional Completeness: Please refer to the Calhoun County ISD Plaintiffs' Designation of Deposition Testimony, which is incorporated herein for all purposes.
Waddell (9/18/12)	74:5 – 163:20	Optional Completeness: Please refer to the Calhoun County ISD Plaintiffs' Designation of Deposition Testimony, which is incorporated herein for all purposes.

Waggoner (9/21/12)	67:14 – 143:16	Optional Completeness: Please refer to the Calhoun County ISD Plaintiffs' Designation of Deposition Testimony, which is incorporated herein for all purposes.
Wiggins (9/12/12)	102:18 – 181:16	Optional Completeness: Please refer to the Calhoun County ISD Plaintiffs' Designation of Deposition Testimony, which is incorporated herein for all purposes.
Youngblood (9/20/12)	57:7 161:2 165:23 166:2	Optional Completeness: Please refer to the Calhoun County ISD Plaintiffs' Designation of Deposition Testimony, which is incorporated herein for all purposes.
EDGEWOOD ISD		
Joseph "Joey" Thomas Patek, III, (8/8/12)	8:5-10:15	Optional Completeness: Please refer to the Calhoun County ISD Plaintiffs' Designation of Deposition Testimony, which is incorporated herein for all purposes.
	60:8-64:13	
	64:23-79:4	
Richard Reedy, Vol. I (8/15/12)	8:7-14 66:10-19 67:2-12 67:15 – 69:8 69:16 – 71:16 72:1-22 73:11-16 73:23 – 75:19 75:25 – 76:4 76:14-25 77:5-8 77:11-24 79:1 – 82:4 82:8 – 83:19 84:4-19	Optional Completeness: Please refer to the Calhoun County ISD Plaintiffs' Designation of Deposition Testimony, which is incorporated herein for all purposes.

Lawrence Harris, (9/7/12)	5:11-5:13	
	6:11-9:18	
	10:7-10:16	
	10:22-31:18	
	173:13-192:6	
	181:21-194:11	
	192:16	
	198:22-199:1	
	205:25-207:25	
	209:18-212:16	
	215:20-216:10	Optional Completeness: 213:17-215:11
William Wiggins, (9/12/12)	8:8-14	Optional Completeness: Please refer to the Calhoun County ISD Plaintiffs' Designation of Deposition Testimony, which is incorporated herein for all purposes.
	77:25-97:2	
	98:2-98:20	
Stephen Waddell, (9/18/12)	8:13-16	Optional Completeness: Please refer to the Calhoun County ISD Plaintiffs' Designation of Deposition Testimony, which is incorporated herein for all purposes.
	9:27-10:6	
	52:3-73:18	
EFFICIENCY INTERVENORS		
Robert Scott (Vol. 1)	270/9-283/17	Optional Completeness: Please refer to the Calhoun County ISD Plaintiffs' Designation of Deposition Testimony, which is incorporated herein for all purposes.
	285/10-286/15	
	288/2-305/10	
	307/24-313/9	
Robert Scott (Vol. 2)	409/19-412/4	Optional Completeness: Please refer to the Calhoun County ISD Plaintiffs' Designation of Deposition Testimony, which is incorporated herein for all purposes.
	412/14-413/24	
	414/5-15	
	414/21-463/3	

Joseph Patek	174/12-189/12	Optional Completeness: Please refer to the Calhoun County ISD Plaintiffs' Designation of Deposition Testimony, which is incorporated herein for all purposes.
Richard Reedy	182/15-218/24	Optional Completeness: Please refer to the Calhoun County ISD Plaintiffs' Designation of Deposition Testimony, which is incorporated herein for all purposes.

Unofficial copy Travis Co. District Clerk Velva L. Price

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250TH JUDICIAL DISTRICT

**CALHOUN COUNTY ISD PLAINTIFFS'
OBJECTIONS TO TRIAL EXHIBITS**

The Calhoun County ISD Plaintiffs hereby file these Objections to Trial Exhibits proposed by other parties in the above-referenced litigation. *See* Exhibit "A" attached hereto.

The Calhoun County ISD Plaintiffs reserve the right to amend, supplement, or withdraw any of their objections at any time. The Calhoun County ISD Plaintiffs specifically reserve the right to object to any documents proven to be misleading or inaccurate through testimony during trial. To the extent a party designated some or all of a deposition transcript as an exhibit, the

Calhoun County ISD Plaintiffs' Objections to Deposition Designations are incorporated herein
by reference.

Respectfully submitted,
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/s/ John W. Turner

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CERTIFICATE OF SERVICE

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EXHIBIT "A"

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
733	00/00/2011	TAKS Met Standards 2006-2011 for Calhoun County ISD Grade 11 All Test	733	Wiggins-William			Foundation; Hearsay; Relevance
1001	7/1/2012	Report of Eric Hanushek in the matter of The Texas Taxpayers & Student Fairness Coalition, et al. - Report for Efficiency Interveners	1001	Hanushek-Eric			Hearsay; Foundation
1013	7/3/2012	Report – Public Education Productivity Improvement: The Path Forward for Texas Policymakers	1013	McAdams-Donald			Hearsay; Relevance
1014		Examining Decades of Growth in K-12 Education	1014	McAdams-Donald			Hearsay; Relevance
1015		Curing Baukmo's Disease: In Search of Productivity Gains in K-12 Schooling	1015	McAdams-Donald			Hearsay; Relevance
1016		School District Mandates: Cost Drivers in Public Education, Updated 2010	1016	McAdams-Donald			Hearsay; Relevance
1017		TIER Special Report, Local Control with Accountability for Results: Flexible Workforce Management for Performance and Productivity	1017	McAdams-Donald			Hearsay; Relevance
1020	11/6/2008	Common Ground, a Declaration of Principles and Strategies for Texas Education Policy	1020	McAdams-Donald			Hearsay; Relevance
1021	1/00/2011	Return on Educational Investment	1021	McAdams-Donald			Hearsay; Relevance
1026		Internet Research – Board of Trustees Election Results – Frisco ISD	1026	Harris-Larry			Hearsay; Relevance
1027	5/12/2012	Cumulative Report – Official Tarrant County – Joint Elections	1027	Harris-Larry			Hearsay; Relevance

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
1028	5/8/2010	Elgin wins Port Lavaca city council race by one vote; incumbents win CCISD board of trustee races	1028	Harris-Larry			Hearsay; Relevance
1118	9/17/2012	Expert Report of Laurie Laughlin Davis, PHD on the TAKS to STAAR Bridge Studies	1118	Klein-Stephen			Hearsay; Foundation
1128	9/28/2012	Supplemented Expert Report of Michael Podgursky, Ph.D.	1128	Podgursky-Michael			Hearsay; Foundation
1133	00/00/2012	Expert Witness report of Allan E. Parker, Jr. Report for Efficiency Interveners	1133	Parker-Allan			Hearsay; Foundation
1135	00/00/2012	Expert Witness report of Allan E. Parker, Jr. Report for Efficiency Interveners	1135	Parker-Allan			Hearsay; Foundation
1313		Some Findings from an Independent Investigation of the Tennessee STAR Experiment and from Other Investigations of Class Size Effects	1313	Odden-Allan			Hearsay; Relevance
1314	5/11/2011	Class Size: What Research Says and What it Means for State Policy	1314	Odden-Allan			Hearsay; Relevance
1315		Effects of Full-Day Kindergarten on Academic Achievement and Social Development	1315	Odden-Allan			Hearsay; Relevance
1316	10/7/2010	Linking Reading Coaches and Student Achievement: Evidence from Florida Middle Schools	1316	Odden-Allan			Hearsay; Relevance
1317		How Instructional Coaches Support Data-Driven Decision Making – Policy Implementation and Effects in Florida	1317	Odden-Allan			Hearsay; Relevance

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
		Middle Schools					
1318	8/19/2011	An Interaction-Based Approach to Enhancing Secondary School Instruction and Student Achievement	1318	Odden-Allan			Hearsay; Relevance
1322	6/1/2012	The Cost of Providing an Adequate Education to English Language Learners: A Review of the Literature	1322	Odden-Allan			Hearsay; Relevance

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTIO N
3000		FY06 – District Information					Untimely; Foundation
3001		FY07 – District Information					Untimely; Foundation
3002		FY08 – District Information					Untimely; Foundation
3003		FY09 – District Information					Untimely; Foundation
3004		FY10 – District Information					Untimely; Foundation
3005		FY11 – District Information					Untimely; Foundation
3006		FY12 – District Information					Untimely; Foundation
3007		Counties Ranked Alphabetically and by District – 2011-12 – 1					Untimely; Foundation
3008		Counties Ranked Alphabetically and by District – 2011-12 – 2					Untimely; Foundation
3009		Counties Ranked Alphabetically and by District – 2011-12 – 3					Untimely; Foundation
3010		M&O revenue table sorted by wealth, grouped by District (2011-12)					Untimely; Foundation
3011		M&O revenue seeking table sorted by wealth, grouped by District (2011-12)					Untimely; Foundation
3012		M&O revenue classroom disadvantage, percentile of wealth, grouped by District (2011-12)					Untimely; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTIO N
3013		I&S revenue table sorted by wealth, grouped by District (2011-12) – all Districts					Untimely; Foundation
3014		I&S revenue classroom disadvantage, percentile of wealth, grouped by District (2011-12) – all Districts					Untimely; Foundation
3015		M&O and I&S revenue table sorted by wealth, grouped by District (2011-12)					Untimely; Foundation
3016		M&O and I&S revenue classroom disadvantage, percentile of wealth, grouped by District (2011-12) – for all Districts with or without I&S tax rates					Untimely; Foundation
3017		M&O revenue table sorted by wealth, grouped by District (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3018		M&O revenue classroom disadvantage, percentile of wealth, grouped by District (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3019		I&S revenue table sorted by wealth, grouped by District (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3020		I&S revenue classroom disadvantage, percentile of wealth, grouped by District (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3021		M&O and I&S revenue table sorted by wealth grouped by District (2011-12)– for Districts with I&S tax rates					Untimely; Foundation
3022		M&O and I&S revenue seeking table sorted by wealth, grouped by District (2011-12) – for Districts with I&S tax rates					Untimely; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
3023		M&O and I&S revenue classroom disadvantage, percentile of wealth, grouped by District (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3024		M&O and I&S revenue plus adjusted weights, table sorted by wealth, grouped by District (2011-12) – all Districts					Untimely; Foundation
3025		M&O revenue table sorted by wealth, grouped by WADA (2011-12)					Untimely; Foundation
3026		M&O revenue seeking table sorted by wealth, grouped by WADA (2011-12)					Untimely; Foundation
3027		M&O revenue classroom disadvantage, percentile of wealth, grouped by WADA (2011-12)					Untimely; Foundation
3028		I&S revenue table sorted by wealth, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3029		I&S revenue classroom disadvantage, percentile of wealth, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3030		M&O and I&S revenue table sorted by wealth, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3031		M&O and I&S revenue classroom disadvantage, percentile of wealth, grouped by WADA (2011-12) – for all District with or without I&S tax rates					Untimely; Foundation
3032		M&O revenue table sorted by wealth, grouped by WADA (2011-12) – for Districts with I&S tax rates					Untimely; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTIO N
3033		M&O revenue seeking table sorted by wealth, grouped by WADA (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3034		M&O revenue classroom disadvantage, percentile of wealth, grouped by WADA (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3035		I&S revenue table sorted by wealth, grouped by WADA (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3036		I&S revenue seeking table sorted by wealth, grouped by WADA (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3037		I&S revenue classroom disadvantage, percentile of wealth, grouped by WADA (2011-12) – I&S Districts only					Untimely; Foundation
3038		M&O and I&S revenue table sorted by wealth grouped by WADA (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3039		M&O and I&S revenue seeking table sorted by wealth, grouped by WADA (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3040		M&O and I&S revenue classroom disadvantage, percentile of wealth, grouped by WADA (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3041		M&O and I&S revenue plus adjusted weights, table sorted by wealth, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3042		M&O revenue table sorted by yield, grouped by District (2011-12) – all Districts					Untimely; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTIO N
3043		M&O revenue classroom disadvantage, percentile of yield, grouped by District (2011-12)					Untimely; Foundation
3044		I&S revenue table sorted by yield, grouped by District (2011-12)					Untimely; Foundation
3045		I&S revenue classroom disadvantage, percentile of yield, grouped by District (2011-12) – all Districts					Untimely; Foundation
3046		M&O and I&S revenue table sorted by yield, grouped by District (2011-12) – all Districts					Untimely; Foundation
3047		M&O and I&S revenue classroom disadvantage, percentile of yield, grouped by District (2011-12) – for all Districts with or without I&S tax rates					Untimely; Foundation
3048		M&O revenue table sorted by yield, grouped by District (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3049		M&O revenue classroom disadvantage, percentile of yield, grouped by District (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3050		I&S revenue table sorted by yield, grouped by District (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3051		I&S revenue classroom disadvantage, percentile of yield, grouped by District (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3052		M&O and I&S revenue table sorted by yield, grouped by District (2011-12) – for Districts with I&S tax rates					Untimely; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTIO N
3053		M&O and I&S revenue classroom disadvantage, percentile of yield, grouped by District (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3054		M&O and I&S revenue plus adjusted weights, table sorted by yield, grouped by District (2011-12) – all Districts					Untimely; Foundation
3055		M&O revenue table sorted by yield, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3056		M&O revenue classroom disadvantage, percentile of yield, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3057		I&S revenue table sorted by yield, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3058		I&S revenue classroom disadvantage, percentile of yield, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3059		M&O and I&S revenue table sorted by yield, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3060		M&O and I&S revenue classroom disadvantage, percentile of yield, grouped by WADA (2011-12) – for all Districts with or without I&S tax rates					Untimely; Foundation
3061		M&O revenue table sorted by yield, grouped by WADA (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3062		M&O revenue classroom disadvantage, percentile of yield, grouped by WADA (2011-12) – for Districts with I&S tax rates					Untimely; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTIO N
3063		I&S revenue table sorted by yield, grouped by WADA (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3064		I&S revenue classroom disadvantage, percentile of yield, grouped by WADA (2011-12) – I&S Districts only					Untimely; Foundation
3065		M&O and I&S revenue table sorted by yield, grouped by WADA (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3066		M&O and I&S revenue classroom disadvantage, percentile of yield, grouped by WADA (2011-12) – for Districts with I&S tax rates					Untimely; Foundation
3067		M&O and I&S revenue plus adjusted weights, table sorted by yield, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3068		M&O revenue table sorted by maximum M&O revenue per WADA, grouped by District (2011-12)					Untimely; Foundation
3069		M&O revenue table sorted by maximum M&O revenue per WADA, grouped by District (2011-12) – all Districts					Untimely; Foundation
3070		M&O revenue classroom disadvantage, percentile of maximum M&O revenue per WADA, grouped by District (2011-12)					Untimely; Foundation
3071		I&S revenue table sorted by maximum I&S revenue per WADA, grouped by District (2011-12) – all Districts					Untimely; Foundation
3072		Maximum I&S revenue seeking table sorted by maximum I&S revenue per WADA grouped by District (2011-12) – all Districts					Untimely; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTIO N
3073		Maximum I&S revenue classroom disadvantage, sorted by maximum I&S revenue per WADA, grouped by District (2011-12) – all Districts					Untimely; Foundation
3074		M&O revenue table sorted by maximum M&O revenue per WADA, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3075		M&O revenue seeking table sorted by maximum M&O revenue per WADA, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3076		M&O revenue classroom disadvantage, percentile of maximum M&O revenue per WADA, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3077		I&S revenue table sorted by maximum I&S revenue per WADA, grouped by WADA (2011-12)					Untimely; Foundation
3078		Maximum I&S revenue seeking table sorted by maximum I&S revenue per WADA, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3079		Maximum I&S revenue classroom disadvantage, sorted by maximum I&S revenue per WADA, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3080		Total maximum revenue table sorted by maximum total revenue per WADA, grouped by District (2011-12)					Untimely; Foundation
3081		Total max revenue table sorted by maximum total revenue per WADA, grouped by District (2011-12) – all Districts					Untimely; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTIO N
3082		Total maximum revenue classroom disadvantage, percentile of total maximum revenue per WADA, grouped by District (2011-12) – all Districts					Untimely; Foundation
3083		Maximum total revenue plus adjusted weights, table sorted by maximum total revenue per WADA, grouped by District (2011-12) – all Districts					Untimely; Foundation
3084		Total maximum revenue table sorted by maximum total revenue per WADA, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3085		Max revenue table sorted by maximum total revenue per WADA, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3086		Total maximum revenue classroom disadvantage, percentile of total maximum revenue per WADA, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3087		Maximum total revenue plus adjusted weights, table sorted by maximum total revenue per WADA, grouped by WADA (2011-12) – all Districts					Untimely; Foundation
3088		M&O revenue per WADA at ATR and student success outcomes, table sorted by wealth, grouped by District (2009-10)					Untimely; Foundation
3089		M&O revenue per WADA at Adopted tax rates and avg SAT scores, sorted by District wealth and grouped by percent of Districts					Untimely; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTIO N
3090		M&O revenue per WADA at Adopted tax rates and avg ACT scores, sorted by District wealth and grouped by percent of Districts					Untimely; Foundation
3091		M&O revenue per WADA at Adopted tax rates and avg TSI percent scores, sorted by District wealth and grouped by percent of Districts					Untimely; Foundation
3092		M&O revenue per WADA at Adopted tax rates and avg Dropout Rates, sorted by District wealth and grouped by percent of Districts					Untimely; Foundation
3093		M&O revenue per WADA at Adopted tax rates and avg TAKS Passing/Commended scores, sorted by District and grouped by percent of Districts					Untimely; Foundation
3094		2011-12 Sorted by Wealth, grouped by District					Untimely; Foundation
3095		2011-12 Sorted by Wealth, grouped by WADA					Untimely; Foundation
3096		2011-12 Sorted by \$6,576 tax rate, grouped by District					Untimely; Foundation
3097		2011-12 Sorted by \$6,576 tax rate, grouped by WADA					Untimely; Foundation
3098		2011-12 All District \$6,576 Analysis					Untimely; Foundation
3099		List of all Districts with a tax rate of \$1.04 and above					Untimely

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
3100		Funding Gap Between Wealthiest and Poorest Districts with 5% of WADA Increases with Target Revenue at \$1.17 M&O Tax Rate					Untimely; Hearsay; Foundation
3101		Funding Gap Between Wealthiest and Poorest Districts with 5% of WADA Increases with Target Revenue at \$1.17 M&O Tax Rate					Untimely; Hearsay; Foundation
3102		Funding Gap Between Wealthiest and Poorest Districts with 5% of WADA Increases with Target Revenue at \$1.17 M&O Tax Rate (\$864 increase in the funding gap)					Untimely; Hearsay; Foundation
3103		Revenue and Tax Rate Advantage Continues to Grow for Wealthiest Districts with 5% of WADA at the M&O Adopted Tax Rate					Untimely; Hearsay; Foundation
3104		Revenue and Tax Rate Advantage Continues to Grow for Wealthiest Districts with 5% of WADA at the M&O Adopted Tax Rate					Untimely; Hearsay; Foundation
3105		Revenue and Tax Rate Advantage Continues to Grow for Wealthiest Districts with 5% of WADA at the M&O Adopted Tax Rate (\$649 increase in the funding gap, and a \$0.064 increase in the tax rate gap)					Untimely; Hearsay; Foundation
3106		Average Disadvantage at \$1.17 Increases in Classroom of 22 Children in Poorest Districts with 5% of WADA, as Compared to Wealthiest Districts					Untimely; Hearsay; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
3107		Classroom Disadvantages for Districts at or Below Selected Percentiles of Wealth, as Compared to Wealthy Counterparts					Untimely; Hearsay; Foundation
3108		Funding Inequities per Typical Elementary Classroom Between Top and Bottom Groups of WADA at \$1.17 M&O Tax Rate (Cumulative FY07 – FY12)					Untimely; Hearsay; Foundation
3109		Funding Gap Between Wealthiest and Poorest Districts with 10% of WADA Increases with Target Revenue at \$1.17 M&O Tax Rate					Untimely; Hearsay; Foundation
3110		Revenue and Tax Rate Advantage Continues to Grow for Wealthiest Districts with 10% of WADA at the M&O Adopted Tax Rate					Untimely; Hearsay; Foundation
3111		Average Disadvantage at \$1.17 Increases in Classroom of 22 Children in Poorest Districts with 10% of WADA, as Compared to Wealthiest Districts					Untimely; Hearsay; Foundation
3112		Funding Gap Between Wealthiest and Poorest Districts with 15% of WADA Increases with Target Revenue at \$1.17 M&O Tax Rate					Untimely; Hearsay; Foundation
3113		Revenue and Tax Rate Advantage Continues to Grow for Wealthiest Districts with 15% of WADA at the M&O Adopted Tax Rate					Untimely; Hearsay; Foundation
3114		Average Disadvantage at \$1.17 Increases in Classroom of 22 Children in Poorest Districts with 15% of WADA, as Compared to Wealthiest Districts					Untimely; Hearsay; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
3115		Funding Gap Between Wealthiest and Poorest Districts with 20% of WADA Increases with Target Revenue at \$1.17 M&O Tax Rate					Untimely; Hearsay; Foundation
3116		Revenue and Tax Rate Advantage Continues to Grow for Wealthiest Districts with 20% of WADA at the M&O Adopted Tax Rate					Untimely; Hearsay; Foundation
3117		Average Disadvantage at \$1.17 Increases in Classroom of 22 Children in Poorest Districts with 20% of WADA, as Compared to Wealthiest Districts					Untimely; Hearsay; Foundation
3118		Wealth Hold-Harmless – an Example of Legislative Intent					Untimely
3119		Wealth Hold-Harmless – an Example of Legislative Intent					Untimely
3120		Legislative Action – re: Hold Harmless					Untimely
3121		Legislative Action – re: Hold Harmless					Untimely
3122		Legislative Action – re: Hold Harmless					Untimely
3123		Legislative Action – re: Hold Harmless					Untimely; Hearsay
3124		Legislative Action – re: Hold Harmless					Untimely; Hearsay
3125		Legislative Action – re: Hold Harmless					Untimely; Hearsay

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
3126		County Comparison Report					Untimely; Foundation
3127		County Comparison Map					Untimely; Foundation
3128		Alamo Heights – San Antonio					Untimely; Foundation
3129		Allen – Lovejoy					Untimely; Foundation
3130		Amarillo – Bushland					Untimely; Foundation
3131		Anahuac – Barbers Hill					Untimely; Foundation
3132		Anahuac – Barbers Hill					Untimely; Foundation
3133		Anton – Sundown					Untimely; Foundation
3134		Anton – Sundown					Untimely; Foundation
3135		Arlington – Carroll					Untimely; Foundation
3136		Belton – Georgetown					Untimely; Foundation
3137		Belton – Salado					Untimely; Foundation
3138		Birdville – Carroll					Untimely; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTIO N
3139		Brownsville – Point Isabel					Untimely; Foundation
3140		Bryan – College Station					Untimely; Foundation
3141		Burleson – Godley					Untimely; Foundation
3142		Castleberry – Carroll					Untimely; Foundation
3143		Central Heights – Cushing					Untimely; Foundation
3144		Cleburne – Glen Rose					Untimely; Foundation
3145		Cleburne – Glen Rose					Untimely; Foundation
3146		Crawford – Midway					Untimely; Foundation
3147		Crawford – Midway					Untimely; Foundation
3148		Eustace – Malakoff					Untimely; Foundation
3149		Garland – Plano					Untimely; Foundation
3150		Garland – Plano					Untimely; Foundation
3151		Goose Creek – Barbers Hill					Untimely; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTIO N
3152		Hillsboro – Glen Rose					Untimely; Foundation
3153		Irving – Highland Park					Untimely; Foundation
3154		Irving – Highland Park					Untimely; Foundation
3155		Kaufman – Forney					Untimely; Foundation
3156		Kaufman – Sunnyvale					Untimely; Foundation
3157		Keller – Carroll					Untimely; Foundation
3158		Keller – Northwest					Untimely; Foundation
3159		Keller – Northwest					Untimely; Foundation
3160		Lake Dallas – Northwest					Untimely; Foundation
3161		Lake Worth – Northwest					Untimely; Foundation
3162		Lake Worth – Carroll					Untimely; Foundation
3163		Little Elm – Frisco					Untimely; Foundation
3164		Little Elm – Frisco					Untimely; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTIO N
3165		Mesquite – Sunnyvale					Untimely; Foundation
3166		Mesquite – Sunnyvale					Untimely; Foundation
3167		Nocona – Prairie Valley					Untimely; Foundation
3168		Pasadena – Deer Park					Untimely; Foundation
3169		Pettus – Pawnee					Untimely; Foundation
3170		Pettus – Pawnee					Untimely; Foundation
3171		Pflugerville – Austin					Untimely; Foundation
3172		Pflugerville – Eanes					Untimely; Foundation
3173		Princeton – Lovejoy					Untimely; Foundation
3174		Princeton – Lovejoy					Untimely; Foundation
3175		Royse City – Rockwall					Untimely; Foundation
3176		River Road – Bushland					Untimely; Foundation
3177		Sanger – Ponder					Untimely; Foundation

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
3178		Sanger – Ponder					Untimely; Foundation
3179		Santa Maria – Point Isabel					Untimely; Foundation
3180		Spearman – Pringle – Morse					Untimely; Foundation
3181		Stephenville – Bluff Dale					Untimely; Foundation
3182		Strawn – Palo Pinto					Untimely; Foundation
3183		Strawn – Palo Pinto					Untimely; Foundation
3184		Tarkington – Devers					Untimely; Foundation
3185		Van – Hawkins					Untimely; Foundation
3186		Woodsboro – Austwell – Tivoli					Untimely; Foundation
3189		Dr. Bruce Baker CV Dr. Bruce Baker - Supplemental Expert Report (3189-A) Dr. Bruce Baker - Supplemental Expert Report — Base Calculation Chart (3189-B) Dr. Bruce Baker - Supplemental Expert Report — State ECWI spreadsheet (3189-C)					Untimely as to the Supplemental Materials

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
3190		Dr. Paul Colbert Expert Report Dr. Paul Colbert Supplemental Expert Report (3190A)					Untimely as to the Supplemental Materials
3225		Cumulative Change in State Aid, Local Tax Collections, and Recapture Since 2005-06					Untimely; Foundation
4197		Cortez – Arizona English Language Learner Cost Study					Untimely; Hearsay
4225		Cortez Supplemental Report 10-18-12 4025					Untimely; Foundation
4226		Copy of edgewood12 Sept 21 2012 with Recap data Oct 18 2012					Untimely; Foundation
8001		Hanushek Supplemental Expert Report and data					Hearsay; Foundation
8002		Schoolhouses, Courthouses and Statehouses					Hearsay; Relevance
8003		Teacher Layoffs Boyd					Hearsay; Relevance
8004		Teacher Career Paths Goldhaber					Hearsay; Relevance
8005		Evaluation Texas Charter Schools 2009-10 Taylor					Hearsay; Relevance
8006		Teachers Schools Acad Achievement Hanushek					Hearsay; Relevance
8007		Managing Teacher Workforce Goldhaber					Hearsay; Relevance

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
8008		Globally Challenged Peterson					Hearsay; Relevance
8009		Long-Term Impacts Teachers Chetty					Hearsay; Relevance
8010		Multiple Choice CREDO					Hearsay; Relevance
8011		ERG Focus ISD					Hearsay; Relevance
8012		Effect of Student to Teacher Ratio on Academic Outcomes					Hearsay; Relevance
8013		A Warning for All Who Would Listen Guthrie					Hearsay; Relevance
8014		Distribution Teacher Quality Hanushek					Hearsay; Relevance
8015		Throwing Money at Schools Hanushek					Hearsay; Relevance
8016		Economics of Schooling Hanushek					Hearsay; Relevance
8017		Evidence on Class Size Mayer					Hearsay; Relevance
8018		Some Findings STAR Hanushek					Hearsay; Relevance
8019		Failure Input-Based Schooling Policies Hanushek					Hearsay; Relevance
8020		Economic Value Higher Teacher Quality Hanushek					Hearsay; Relevance

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
8021		Charter School Quality Parental Decision-Making Hanushek					Hearsay; Relevance
8022		How Much Outcomes Matter OECD Hanushek					Hearsay; Relevance
8023		Moe Report					Hearsay; Relevance
8025		Stagnant Nation					Hearsay; Relevance
8026		Teach for America Xu					Hearsay; Relevance
8027		Nation at Risk 1983					Hearsay; Relevance
8028		Blocking Diluting Co-Opting Merit Pay Buck					Hearsay; Relevance
8029		Charter School Achievement 2003 NAEP					Hearsay; Relevance
8030		Collective Bargaining Performance of the Public Schools Moe					Hearsay; Relevance
8031		Collective Bargaining in Education Hannaway					Hearsay; Relevance
8032		Effects of TFA on Students Decker					Hearsay; Relevance
8033		Election Timing Anzia					Hearsay; Relevance
8034		Class Size Debate Hanushek					Hearsay; Relevance

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
8035		Teacher Quality Hanushek					Hearsay; Relevance
8036		How Teachers' Unions Affect Education Production Hoxby					Hearsay; Relevance
8037		Human Capital in Hartford Public Schools					Hearsay; Relevance
8038		Impact Teacher Preparation North Carolina					Hearsay; Relevance
8039		Can Arne Duncan (And \$5 Billion) Fix America's Schools					Hearsay; Relevance
8040		A Primer on America's Schools					Hearsay; Relevance
8041		There is no war on teachers Hanushek					Hearsay; Relevance
8042		Eight Questions for Wendy Kopp					Hearsay; Relevance
8043		Teach for America USA Today					Hearsay; Relevance
8044		Public Money Can Pay Religious-School Tuition					Hearsay; Relevance
8045		Democrats Limit Future Financing for Washington Voucher Program					Hearsay; Relevance
8046		NAEP 2008 Trends in Academic Progress					Hearsay; Relevance
8047		Teach for America Heilig					Hearsay; Relevance

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
8048		Politics of the Status Quo Moe					Hearsay; Relevance
8049		Separation of Degrees Roza					Hearsay; Relevance
8050		Teacher Certification Reconsidered Walsh					Hearsay; Relevance
8051		Teach for America Louisiana Study Noell					Hearsay; Relevance
8052		The Search for American Political Development Orren					Hearsay; Relevance
8053		NEA Positive Agenda for the ESEA Reauthorization					Hearsay; Relevance
8054		What Does Certification Tell About Teacher Effectiveness Kane					Hearsay; Relevance
8055		Greenfield School Revolution and School Choice					Hearsay; Relevance
8056		Lessons for Ohio from Floridas K-12 Education Revolution					Hearsay; Relevance
8057		Saving Now Saving Later Remediation					Hearsay; Relevance
8058		KG Survey Results					Hearsay; Relevance
8059		The Fiscal Effects of School Choice Programs					Hearsay; Relevance
8060		Facing the Future Hill					Hearsay; Relevance

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
8061		Education Reform for the Digital Era Finn					Hearsay; Relevance
8062		Sheepskin Effect Miller					Hearsay; Relevance
8063		Increasing the Odds					Hearsay; Relevance
8064		Teachers and Student Achievement Chicago Aaronson					Hearsay; Relevance
8065		Three Way Error Analysis Goldhaber					Hearsay; Relevance
8066		What Does Certification Tell About Teacher Effectiveness Kane					Hearsay; Relevance
8067		Making Resource Decisions Amidst Uncertainty Guthrie					Hearsay; Relevance
8068		TSG Savings Study Bast					Hearsay; Relevance
8069		TSG Teachers Win Bast					Hearsay; Relevance
8071		Trotter Report					Hearsay; Foundation
8072		Venable Report					Hearsay; Foundation
8080		Smart Practices Instruction and Staffing					Hearsay; Relevance

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
8086		HouseRcaucus					Hearsay; Relevance
8087		Original Inter. 1876					Hearsay; Relevance
8088		ERG Focus ISD					Hearsay; Relevance
8089		Waiting for Superman (video)					Hearsay; Relevance
8090		Uses of Teacher Evaluation Results by District					Hearsay; Relevance
8091		Teacher Proficiency Statewide					Hearsay; Relevance
8092		Systems Used to Evaluate Teacher Performance					Hearsay; Relevance
8093		Principal Proficiency Rates Statewide					Hearsay; Relevance
8094		Principal Evals including Student Performance Chart					Hearsay; Relevance
8099		North Forest Teacher Prof. Chart					Hearsay; Relevance
8100		Overview_of_PEEQ2					Hearsay; Relevance
8101		PEEQ_Texas_Report_website_sm					Hearsay; Relevance
8102		Thoughts Alt to Class Size Reduction					Hearsay; Relevance

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
8104		Scrap the Sacrosanct Salary Schedule Education Next					Hearsay; Relevance
8105		PEIMS Single File Financial Data Downloads					Hearsay; Relevance
8106		Atty Fee Affidavit JCD					Hearsay; Relevance
8107		Atty Fee Affidavit CTE					Hearsay; Relevance
8108		Ch 21 Legal TIER Powel and Leon					Hearsay; Relevance
8109		Why Don't Schools and Teachers Seem to Matter Goldhaber					Hearsay; Relevance
8110		Charter School List					Hearsay; Relevance
8111		Teacher Selection Smart Selection					Hearsay; Relevance
8112		Learning from Really Bad Graphs					Hearsay; Relevance
8113		Senate Testimony, Oct. 2012					Hearsay; Relevance
9003		An Analysis of Gaps in Funding for Charter Schools and Traditional Districts by Debra S. Haas (March 2009)					Hearsay; Relevance

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
9004		TCSA 05/24/11 Press Release D "New Facility Inventory Finds Majority of Texas Charter School Facilities Are Inadequate Due to Continual Funding Inequity"					Hearsay; Relevance
9005		TCSA 10/08/12 Press Release D TCSA Marks 4 th Year Serving Charters, Students and Families D "Demand For Texas Charters Grows, Waiting List More Than 101,000"					Hearsay; Relevance
9006		TCSA 02/03/11 Press Release D "Funding Gap Among Charter School Districts and Independent School Districts Widens"					Hearsay; Relevance
9007		Report by TCSA, National Alliance for Public Charter Schools and Colorado League of Charter Schools D "Shortchanged Charters: How Funding Disparities Hurt Texas' Charter Schools" (May 2011)					Hearsay; Relevance
9023		Executive Summary of Lori Taylor's 2009-2010 Texas A&M Annual Charter School Report commissioned by the Texas Education Agency					Hearsay; Relevance
10081		2012 08.16 revenue gained by tax rate increases revised 2.xlsx					Foundation; Hearsay; Relevance
10574		Academic Performance and Persistence of Texas HS Graduates.pdf					Foundation; Hearsay; Relevance

Ex. No.	Date	Description	Bates Range/ Depo Ex. No.	Deponent	OFFERED	ADMITTED	OBJECTION
10787		Grover Whitehurst Expert Report.pdf					Hearsay; Foundation
10788		James Guthrie Report.pdf					Hearsay; Foundation
10797		SUPPLEMENTED REPORT OF MICHAEL PODGURSKY.pdf					Hearsay; Foundation
11010		Ayala - Laura Ayala Expert Report					Hearsay; Foundation
11117		Chapter 41 Districts 2011-2012					Foundation; Hearsay; Relevance
11124		Dr. Bonnie Lesley Expert Report					Foundation; Hearsay; Relevance
11125		Whitehurst backup to supplemental analysis					Foundation; Hearsay; Relevance; Untimely
11126		2012 10.19 Whitehurst supplement					Foundation; Hearsay; Relevance; Untimely