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Amalia Rodriguez-Mendoza
District Clerk
Travis District
D-1-GN-11-003130

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

TEXAS TAXPAYER & STUDENT FAIRNESS COALITION, *et al.*,	§	IN THE DISTRICT COURT OF
Plaintiffs,	§	
VS.	§	
MICHAEL WILLIAMS, TEXAS COMMISSIONER OF EDUCATION, *et.al.*,	§	
Defendants	§	
Consolidated Case:	§	
FORT BEND INDEPENDENT SCHOOL DISTRICT, *et al.*,	§	
Plaintiffs,	§	
VS.	§	TRAVIS COUNTY, TEXAS
MICHAEL WILLIAMS, TEXAS COMMISSIONER OF EDUCATION, *et. al.*,	§	
Defendants.	§	200TH JUDICIAL DISTRICT

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FORT BEND ISD PLAINTIFFS' OBJECTIONS
TO EXHIBITS AND DEPOSITION DESIGNATIONS

Plaintiffs Fort Bend ISD, et. al. ("The Fort Bend ISD Plaintiffs") file this their Objections to Exhibits and Deposition Designations (the "Objections List"). *See* Exhibit "A" attached hereto.

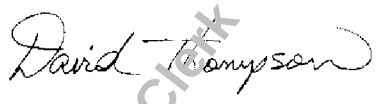
The Fort Bend ISD Plaintiffs expressly reserve the right to amend or supplement the Objections List and to withdraw or add objections subject to the Court's ruling on certain legal issues. The Fort Bend ISD Plaintiffs also expressly reserve the right to object to the admissibility of any document which is not properly authenticated during the course of trial or which is shown through testimony to be inaccurate or misleading. The Fort Bend ISD Plaintiffs

also expressly reserve the right to object to the admission of reports produced by or relied on by experts who have not yet been deposed.

The Fort Bend ISD Plaintiffs further reserve the right to object to the State's and Intervenors' designation of portions of the Fort Bend ISD Plaintiffs' school district official witnesses under the Rule of Optional Completeness if any objections to the designation of the entire deposition transcript are sustained.

Respectfully submitted,

THOMPSON & HORTON LLP



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been forwarded on this 19th day of October, 2012 to counsel of record in accordance with Rule 21a of the Texas Rules of Civil Procedure, as follows:

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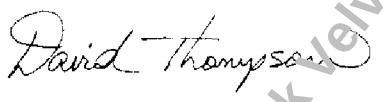

J. David Thompson, III

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Exhibit "A"

FORT BEND ISD PLAINTIFFS' OBJECTIONS LIST

Ex. No.	Description	Bates Range/Depo	OFFERED	ADMITTED	OBJECTION
554	AISD anticipates passing surplus budget	Burns	Defendants		hearsay relevance
1012	Adjusted Effect of Spending on District TAKS Performance - All Districts	Hanushek	Defendants		lack of foundation/authentication hearsay relevance
1155	District Level Confidence Bands CI_1	Duncombe	Defendants		lack of foundation/authentication hearsay relevance
1717	Total Revenue per pupil graph	Ray	Defendants		lack of foundation/authentication hearsay relevance
1718	TAKS tests result graph	Ray	Defendants		lack of foundation/authentication hearsay relevance
1719	Admin and Teacher Salaries, 2006-2011	Ray	Defendants		lack of foundation/authentication hearsay relevance
1720	Duncanville ACT Average Scores	Ray	Defendants		lack of foundation/authentication hearsay relevance
1721	Duncanville SAT Average Scores	Ray	Defendants		lack of foundation/authentication hearsay relevance

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