

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

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
	§	
MICHAEL WILLIAMS, COMMISSIONER	§	
OF EDUCATION, IN HIS OFFICIAL	§	
CAPACITY; SUSAN COMBS,	§	
TEXAS COMPTROLLER OF PUBLIC	§	
ACCOUNTS, IN HER OFFICIAL	§	
CAPACITY; TEXAS STATE BOARD	§	
OF EDUCATION,	§	
Defendants.	§	200 th JUDICIAL DISTRICT

EDGEWOOD PLAINTIFFS’ FIRST SUPPLEMENTAL EXHIBIT LIST

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

Exhibit No.	Exhibit	Objection Filed By*	Volume	Admitted
4254	Zamora Edgewood ISD Surveys			
4255	Zamora McAllen ISD Surveys			
4256	Zamora Harlingen ISD Surveys			
4257	NO EXHIBIT – left blank			
4258	2012-13 State TAPR Report			
4259	2012-13 STAAR Summary Reports, Spring and Summer Administrations for STATE			

* Withdrawn objections, including those not raised in open court, are not noted.

Exhibit No.	Exhibit	Objection Filed By [†]	Volume	Admitted
4260	TAPR Glossary			
4261	NO EXHIBIT – left blank			
4262	Spring 2013 TELPAS Summary Report			
4263	Amarillo ISD 2012-13 TAPR			
4264	Pasadena ISD 2012-13 TAPR			
4265	Amarillo ISD 2012-13 Accountability Summary			
4266	Pasadena ISD 2012-13 Accountability Summary			
4267	July 25, 2013 TEA Letter Subject Estimated Supplemental Funding for Prekindergarten and attachment			
4268	TEA, Grade-Level Retention in Texas Public Schools, 2011-12 (November 2013)			
4269	TEA, Secondary School Completion and Dropouts in Texas Public Schools, 2011-12, August 2013)			
4270	Budgets for Pasadena ISD			
4271	Budgets for Amarillo ISD			
4272	Master Dataset with Charters for Report Sep 30 NF 2013 LDF			
4273	Monica Martinez deposition			
4274	TEA Letter: 2013-2014 Teacher Shortage Areas			
4275	Amarillo ISD 2012-13 STAAR Summary Reports, Spring Administration and Summer Administration			
4276	Pasadena ISD 2012-13 STAAR Summary Reports, Spring Administration and Summer Administration			
4277	Business Records Affidavit of Olga Moutcoulis, Executive Assistant to Superintendent (Edgewood ISD)			
4278	Edgewood ISD 2013-14 Adopted Budget and PowerPoint			
4279	Edgewood ISD 2012-14 Budget Summary Report			
4280	Edgewood ISD SB1/HB1025 Budget Summary			

[†] Withdrawn objections, including those not raised in open court, are not noted.

Exhibit No.	Exhibit	Objection Filed By [‡]	Volume	Admitted
4281	Edgewood ISD 2012-13 Class Waiver Online Report			
4282	Edgewood ISD 2013 STAAR 3-8 and EOC Summary Reports			
4283	Edgewood ISD 2012-13 ACT/AP Results			
4284	Edgewood ISD 2013-14 Summary of Finances			
4285	Edgewood ISD 2013 Pre-K Waitlists			
4286	Edgewood ISD 2012-13 Accountability Summary			
4287	Business Records Affidavit of Julio Cavazos, Assistant Superintendent for Business Services (Harlingen CISD)			
4288	Harlingen CISD 2012-13 TAPR			
4289	Harlingen CISD 2012-13 Budgeted Financial Data			
4290	Harlingen CISD 2012-13 Waivers Online Report			
4291	Harlingen CISD 2011-12 Actual Financial Data			
4292	Harlingen CISD 2013-14 Summary of Finances			
4293	Harlingen CISD 2011-12 AFIS Report			
4294	Harlingen CISD 2012-13 Accountability Summary			
4295	Business Records Affidavit of Connie Lopez, Assistant Superintendent of Business Operations (McAllen ISD)			
4296	McAllen ISD 2012-13 Adopted Budget			
4297	McAllen ISD 2013-14 Adopted Budget and June 24, 2013 Report			
4298	McAllen ISD 2013-14 Class Waiver Requests			
4299	McAllen ISD 2013 STAAR 3-8 and EOC Summary Reports			
4300	McAllen ISD 2012-13 SAT/ACT/AP Results			
4301	McAllen ISD 2013 IB Results			
4302	McAllen ISD 2012-13 TAPR			
4303	McAllen ISD 2013 Comprehensive Annual Financial Report			

[‡] Withdrawn objections, including those not raised in open court, are not noted.

Exhibit No.	Exhibit	Objection Filed By [§]	Volume	Admitted
4304	McAllen ISD 2012-13 Waivers Online Report			
4305	McAllen ISD 2011-12 AEIS Report			
4306	McAllen ISD 2013-14 Increases in Benchmark			
4307	McAllen ISD 2013-14 Demographic Data			
4308	McAllen ISD 2013-14 Summary of Finances			
4309	McAllen ISD 2012-13 Budget Detailed Analysis			
4310	McAllen ISD 2012-13 Accountability Summary			
4311	Business Records Affidavit of Emma McCall, Emma McCall, Business Manager (San Benito CISD)			
4312	San Benito CISD 2012-13 Adopted Budget			
4313	San Benito CISD 2013-14 Budget Focus			
4314	San Benito CISD 2012-13 Waivers Online Report			
4315	San Benito CISD 2013 STAAR 3-8 and EOC Summary Reports			
4316	San Benito CISD 2012-13 TAPR			
4317	San Benito CISD 2011-12 AEIS Report			
4318	San Benito CISD 2013-14 Summary of Finances			
4319	San Benito CISD 2012-13 Accountability Summary			
4320	Business Records Affidavit of Raymundo Villarreal, Superintendent (La Feria ISD)			
4321	La Feria ISD 2012-14 Budget Summary Report			
4322	La Feria ISD 2013-14 Summary of Finances			
4323	NO EXHIBIT – left blank			
4324	La Feria ISD 2013 STAAR 3-8 and EOC Summary Reports			
4325	La Feria ISD 2012-13 AP Results			
4326	La Feria ISD 2012-13 TAPR			
4327	La Feria ISD 2011-12 AEIS Report			

[§] Withdrawn objections, including those not raised in open court, are not noted.

Exhibit No.	Exhibit	Objection Filed By**	Volume	Admitted
4328	La Feria ISD 2012-13 Accountability Summary			
4329	La Feria ISD 2013 SAT/ACT Scores			
4330	Edgewood ISD 2013-14 Class Waiver Applications			
4331	San Benito CISD 2013-14 Class Waiver Request List			
4332	San Benito CISD 2013-14 Disaggregation of PEIMS Student Data			
4333	APAC/ATAC Recommendations for Accountability System Development for 2013 and Beyond (March 14, 2013)			
4334	Julio Cavazos Deposition Excerpts			
4335	Bill Hammond Deposition Excerpts			

DATED: January 6, 2014

Respectfully Submitted,

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**Admitted Pro Hac Vice*

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Unofficial copy Travis Co. District Clerk Velda L. Price

CERTIFICATE OF SERVICE

By my signature below, I certify that on January 6, 2013, I served the foregoing document via electronic mail to all the other parties listed below:

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Attorneys for Texas Charter Schools Association, et al.

s/ David G. Hinojosa
David G. Hinojosa

Unofficial copy Travis Co. District Clerk Velda L. Price

I. Witnesses Who Will Testify

Julio Cavazos, Assistant Superintendent for Business Services
Harlingen CISD
407 North 77 Sunshine Strip
Harlingen, TX 78550
(956) 430-9730

Will testify live and/or by deposition excerpts regarding his position as business officer for the named plaintiff district and the impact of legislation passed during the 2013 legislative session on district operations and achievement.

Dr. Albert Cortez
Director of Policy
Intercultural Development Research Association
5815 Callaghan Road, Suite 101
San Antonio, Texas 78228
210-444-1710

Will testify about the facts and opinions related to his expert report disclosed in this case, including but not limited to the impact of legislation passed during the 2013 legislative session relative to his analysis. Dr. Cortez may also testify to rebut testimony related to other financial efficiency reports disclosed in this case.

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Celina Moreno
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(210) 224-5476

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Fax: (617) 628-0322

These attorneys will testify regarding attorney fees and costs recoverable by Edgewood Plaintiffs.

Dr. Roberto Zamora
The University of Texas-Pan American
1201 W. University Drive
Edinburg, TX 78539-2999

Dr. Zamora will testify about the facts and opinions related to his expert report disclosed in this case, including but not limited to the effects of SB 1, HB 1025 and HB 5 on the adequacy and suitability claims of the Edgewood Plaintiffs.

II. Witnesses Who May Testify

Yolanda Canales
Jessica Romero
Arturo Robles
Araceli Vasquez
c/o David Hinojosa
Marisa Bono
MALDEF
110 Broadway, Ste. 300
San Antonio, TX 78249
(210) 224-5476

Plaintiffs who may testify regarding their property taxes and their children schools' current educational programs, offerings and achievement in the school year 2013-14.

Dr. Jose A. Cervantes, Superintendent
Edgewood ISD
5358 W. Commerce
San Antonio TX 78237
(210) 444-4520

May testify regarding his experience with schools, including his respective position as superintendent for the named plaintiff district and the impact of legislation passed during the 2013 legislative session on district operations and achievement.

Dr. James J. Ponce, Superintendent
McAllen ISD
2000 North 23rd Street
McAllen, TX 78501
(956) 618-6027

May testify regarding his experience with schools, including his respective position as superintendent for the named plaintiff district and the impact of legislation passed during the 2013 legislative session on district operations and achievement.

Alfonso Obregon, Interim Superintendent
San Benito CISD
240 N. Crockett Street
San Benito, TX 78586
(956) 361-6110

May testify regarding his experience with schools, including his respective position as superintendent for the named plaintiff district and the impact of legislation passed during the 2013 legislative session on district operations and achievement.

Raymundo Villarreal, Superintendent
La Feria ISD
203 East Oleander Ave.
La Feria, TX 78559
(956) 797-8300

May testify regarding his experience with schools, including his respective position as superintendent for the named plaintiff district and the impact of legislation passed during the 2013 legislative session on district operations and achievement.

Edgewood Plaintiffs further refer the Court and hereby incorporate by reference, the witnesses designated by other parties in this case, and reserve the right to call such witnesses named and other witnesses whose rebuttal testimony cannot be anticipated at this time.

DATED: January 6, 2014

Respectfully Submitted,

**Mexican American Legal Defense and
Educational Fund, Inc.**

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Deposition of Mr. Bill Hammond
November 20, 2013
page:line
25:9-46:21

Deposition of Ms. Monica Martinez
December 4, 2013
page:line
Entire Deposition Transcript

DATED: January 6, 2014

Respectfully submitted,

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