

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;	§	
TEXAS CHARTER SCHOOL	§	
ASSOCIATION, et al.	§	
Plaintiffs	§	
	§	
	§	
	§	
	§	
JOYCE COLEMAN, et al	§	
Intervenors	§	
	§	
vs.	§	200th JUDICIAL DISTRICT
	§	
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, the TEXAS	§	
EDUCATION AGENCY, and the	§	
STATE OF TEXAS	§	
Defendants.	§	TRAVIS COUNTY, TEXAS

STATE DEFENDANTS' WITNESS LIST

TO THE HONORABLE JOHN K. DIETZ:

The State Defendants, Michael Williams, Commissioner of Education and Susan Combs, Texas Comptroller of Public Accounts, in their official capacities, the Texas State Board of Education, the Texas Education Agency and the State of Texas submit this list of witnesses they either will or may call to the trial beginning January 21, 2014:

1. Lisa Dawn-Fisher, Associate Commissioner of School Finance/Chief School Finance Officer. **Will Call.**

Dr. Dawn-Fisher may testify about state, local school district, and charter school revenue and expenditures. Dr. Dawn-Fisher may also testify about funding equities among the school districts, as well as charter schools. Dr. Dawn-Fisher may testify about the ad valorem tax structure in Texas, districts' use of ad valorem property taxes to raise local revenue, and any remaining taxing capacity available in the system. Dr. Dawn-Fisher may testify about state facilities funding, Interest & Sinking (I&S) tax rates trends, and changes to the yield associated with I&S taxes.

2. Shirley Beaulieu, Associate Commissioner, Finance. **Will Call.**

Ms. Beaulieu may testify about the Texas Education Agency's budget by certain major components, including Rider 3, Chapter 42 and 46, Federal Funds, and State Funds—General Revenue Related Funds for the 2013-2014, and 2014-2015 biennium.

3. Monica Martinez, Commissioner, Standards and Programs. **Will Call.**

Ms. Martinez may testify about Legislative changes to the Texas Essential Knowledge and Skills, changes to the required curriculum, and changed graduation requirements.

4. Shannon Housson, Director, Division of Performance Reporting. **Will Call.**

Mr. Housson may testify about the development and status of state and federal accountability systems for year 2013-14 or forward. In the event the Court overrules any objections to the admission of evidence that is unrelated to the changes made to the public school system by the 83rd Texas legislature and Plaintiffs or Intervenors present evidence of that nature, Mr. Housson may testify about 2013 state and federal accountability systems and any data that is included in the AEIS reports.

In the event the Court overrules any objections to the admission of evidence that is unrelated to the changes made to the public school system by the 83rd Texas legislature and Plaintiffs or Intervenors present evidence of that nature, Defendants **may call** the following witnesses:

5. Gloria Zyskowski, Director, Student Assessment.

Ms. Zyskowski may testify about changes to the numbers of standardized tests required to be taken by students in various grades, the passing standards for the required assessments, the release or availability of those assessments and assessment results.

6. Rob Coleman, Assistant Director, Fiscal Management Division, Texas Comptroller of Public Accounts.

Mr. Coleman may testify the budget setting process for the 83rd Legislative Session and Legislative appropriations for the FY2014-2015.

7. Susie Coultriss State Director, Bilingual Education/Title III/Migrant Education.

Ms. Coultriss may testify about English Language Learner programs and assessment, Bilingual Education program and assessment, and funding for the programs.

8. Linda Roska Director, Division of Research and Analysis.

Ms. Roska may testify about drop out calculations and measures, high school graduations rates, and trends in educational achievements benchmarks. She may also testify about other programs and measures related to these areas.

9. Sally Partridge, Associate Commissioner for Accreditation and School Improvement.

Ms. Partridge may testify about the changes to the number of available charters in Texas, and any policy implementation by TEA stemming from the 83rd Legislative Session.

10. Justin Porter, Director of Assessments for Special Populations.

Mr. Porter may testify about assessments for students in special populations.

Defendants note that this list is subject to change based on the availability of the witnesses, and reserve the right to add or remove witnesses as necessary. Defendants further reserve the right to call to testify as a witness any party plaintiffs not called by the Plaintiffs in their case in chief, incorporate by reference all deposition designations, and reserve the right to call any other witnesses whose rebuttal testimony could not be anticipated at this time.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of January, 2014, I forwarded the foregoing document to all known counsel of record via email and/or by uploading to a file hosting service (Secure Share):

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