

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

TEXAS TAXPAYER & STUDENT  
FAIRNESS COALITION, et al.,

Plaintiffs,

VS.

MICHAEL WILLIAMS, Commissioner of  
Education, et al.,

Defendants.

IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

200<sup>TH</sup> JUDICIAL DISTRICT

*CONSOLIDATED CASE:*

CALHOUN COUNTY INDEPENDENT  
SCHOOL DISTRICT, et al.,

Plaintiffs,

VS.

MICHAEL WILLIAMS, Commissioner of  
Education, et al.,

Defendants.

**CALHOUN COUNTY ISD PLAINTIFFS’  
PROPOSED WITNESS LIST FOR SECOND PHASE OF TRIAL**

The Calhoun County ISD Plaintiffs serve this their Proposed Witness List for Second Phase of Trial (“Proposed Witness List”). See Exhibit “A” attached hereto.

By identifying these witnesses, the Calhoun County ISD Plaintiffs do not waive their right to object if any other party attempts to offer the witnesses’ testimony at trial. The Calhoun County ISD Plaintiffs expressly reserve the right to amend or supplement this list at any time. The Calhoun County ISD Plaintiffs further reserve the right to re-designate witnesses as being called live or by deposition. This Proposed Witness List does not relate to the bifurcated phase of trial relating to attorney’s fees. The Calhoun County ISD Plaintiffs reserve the right to identify witnesses

including, among others, George Bramblett and John Turner, to testify regarding any party's claim for attorney's fees at a later time.

Each of the witnesses below is expected to testify in accordance with previous disclosures by the Calhoun County ISD Plaintiffs and may testify on matters for which rebuttal testimony is necessary. Please refer to the Calhoun County ISD Plaintiffs' disclosures in this case, deposition testimony provided in this case by the witnesses designated below, and/or the expert reports submitted by the witnesses in this case.

Respectfully submitted,

HAYNES AND BOONE, LLP

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ATTORNEYS FOR THE  
CALHOUN COUNTY ISD PLAINTIFFS

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been served this 6th day of January, 2014 as provided below:

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/s/ Michelle C. Jacobs

Michelle C. Jacobs

**EXHIBIT "A"**

The Calhoun County ISD Plaintiffs anticipate calling the following witnesses live at trial but reserve the right to withdraw or amend this designation or to re-designate any of these witnesses as witnesses to be called by deposition:

- (1) Mr. Lynn Moak  
Moak, Casey & Associates, LLP  
1801 N. Lamar, Suite 202  
Austin, Texas 78701
- (2) Mr. Joe Wisnoski  
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The Calhoun County ISD Plaintiffs reserve the right to call the following witnesses either live or by deposition:

- (3) Any rebuttal or impeachment witnesses
- (4) Any expert or fact witness designated by any other party
- (5) Custodians of records as necessary to authenticate documents
- (6) Any other witness for whom deposition designations have been submitted by any party, including the Calhoun County ISD Plaintiffs
- (7) Any other witness for whom final deposition transcripts have not yet been received