

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

200TH 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' OBJECTIONS TO
COUNTER-DEPOSITION DESIGNATIONS FOR SECOND PHASE OF TRIAL**

The Calhoun County ISD Plaintiffs serve this their Objections to Counter-Deposition Designations for Second Phase of Trial, and object to the following counter-designations filed by the State Defendants.

Bill Hammond, Nov. 20, 2013

<u>Counter-Designation</u>	<u>Objectionable Passage</u>	<u>Objection</u>
51:24 – 56:22	56:5-11	Hearsay; Foundation
	56:20-22	Hearsay; Foundation
57:11-17	N/A	N/A
58:3 – 64:10	58:3-13	Hearsay; Foundation
	58:18-24	Undesignated expert opinion; Lack of expert qualifications; Foundation
	60:21 – 61:1	Hearsay
	61:18 – 62:6	Hearsay; Foundation
	62:14-18	Undesignated expert opinion; Lack of expert qualifications
	63:13-16	Undesignated expert opinion; Lack of expert qualifications
	63:22 – 64:11	Undesignated expert opinion; Lack of expert qualifications; Foundation

With respect to any witness who may be presented by deposition, or whose deposition may otherwise be used at trial, but for whom specific excerpts have not been designated (for example, because the entire transcript was designated), the Calhoun County ISD Plaintiffs reserve the right to object upon the designation or use of specific excerpts from the depositions.

The Calhoun County ISD Plaintiffs expressly reserve the right to amend, supplement, and/or withdraw any objections to any party's counter designations of deposition testimony.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served this 22nd day of January, 2014 as provided below:

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