

**In The
Supreme Court of the United States**

STATE OF FLORIDA,

Plaintiff,

v.

STATE OF GEORGIA,

Defendant.

Before the Special Master

Hon. Ralph I. Lancaster

**STATUS REPORT OF THE STATE OF GEORGIA
DECEMBER 4, 2015**

This report constitutes the eleventh monthly status report filed by the State of Georgia pursuant to Section 4 of the Case Management Plan.

I. GENERAL STATUS

Having met the November 10, 2015 deadline for written discovery and document productions, Georgia is now intently focused on depositions and preparation of expert reports. The parties have scheduled multiple depositions nearly every week between now and the fact discovery cutoff of February 29, 2015, though a number of depositions still remain to be scheduled. Deponents include current and former employees of both Florida and Georgia, university professors who have evaluated issues relevant to the case, and other third parties with relevant knowledge.

Georgia completed its final rolling production of documents and data responsive to Florida's document requests on November 10, 2015, consistent with the deadline set in the Case Management Plan. After the deadline for service of document requests to secure production before the November 10 cutoff, Florida served a number of subpoenas duces tecum to Georgia, Georgia university professors, and other third parties for production of documents in connection with depositions, and Georgia continues to produce documents responsive to those requests and to meet and confer with Florida to narrow the scope of those requests. Florida continues to seek email production from deponents who are outside the scope of the parties' agreed email custodians. Nonetheless, Georgia is working with Florida to evaluate each of these requests on a case-by-case basis.

In addition, Georgia continues to review the voluminous documents and data produced by Florida immediately before the close of document discovery. Florida made five separate productions totaling over 600,000 pages within a week of the November 10 production deadline, many of which contained documents and data that were relevant to depositions scheduled to take place soon thereafter. This issue is discussed at greater length in Section IV below.

Although the parties continue to meet and confer about discovery, Georgia remains concerned about Florida's discovery responses regarding its alleged harm. Florida supplemented its interrogatory responses on November 9, 2015, and in so doing pivoted from its initial and long-standing focus on the 2012 oyster collapse as Florida's principal alleged harm and now appears to claim that the entire Apalachicola Bay and nearly every plant and animal species that resides within it may have been or will be harmed, without providing any actual evidence to back up that claim. Georgia has sought to obtain through a 30(b)(6) deposition the facts and data it needs concerning Florida's alleged harm so that Georgia's experts can develop their reports and

so that Georgia can properly defend this case. To facilitate resolution of this issue, Georgia has met Florida halfway by proposing revised 30(b)(6) topics, and although Florida has now indicated for the first time after months of objecting that it will produce witnesses on these topics, it is still not clear whether Florida will agree to testify to all of the topics Georgia has requested, or whether they will agree to schedule depositions on a timeline that facilitates Georgia's use of this information for its experts. Further details about Georgia's discovery efforts are set forth below in Section II.

II. STATUS OF GEORGIA'S DISCOVERY EFFORTS

A. Written Discovery Between Parties.

Georgia and Florida each served a third set of interrogatories, as well as their first sets of requests for admission ("RFAs"), on September 25, 2015.

Georgia served its objections to Florida's RFAs and third set of interrogatories on October 26, 2015. Georgia served its substantive responses to Florida's RFAs and third set of interrogatories on November 9, 2015.

Georgia served its second supplemental response to Florida's first set of interrogatories on November 10, 2015. Georgia plans to serve its third supplemental responses to Florida's first set of interrogatories, and related data, on December 4, 2015. To the extent necessary, Georgia will supplement its responses to Florida's interrogatories as discovery continues. Although Georgia does not believe its original responses were deficient, Georgia is currently meeting and conferring on Florida's requests for additional supplementation of its responses to Florida's Interrogatories 12, 28, and 29, and intends to supplement those responses next week.

On November 9, 2015, Florida served Georgia with its Responses to Georgia's RFAs. As detailed in correspondence to Florida dated November 24, 2015, over half of Florida's RFA

responses are non-responsive or otherwise deficient. Georgia has requested that Florida revise and resubmit amended, responsive answers to those specific RFAs by December 18, 2015.

B. Review of Documents Produced By Florida and Florida Third Parties.

As stated in last month's status report, Florida's production of documents for key custodians was heavily loaded in the last two months of the document discovery period. For instance, in the week prior to the November 10 production deadline, Florida produced over 30,000 documents totaling over 600,000 pages in five separate productions. These documents included materials relevant to depositions that had been scheduled weeks before for dates in mid-November. Certain depositions had to be postponed due to the timing of these productions and the resulting lack of documents available for depositions of key witnesses.

Florida's November production of over 600,000 pages compounded the issues presented by the nearly 1 million pages Florida produced in mid-October, especially given that Florida universities had also produced 200,000 documents, totaling 1.5 million pages, in September. Florida's delayed and large productions in mid-October similarly required Georgia to push back its first two depositions because of the large production of relevant materials made by Florida the week before those depositions were scheduled to take place. Florida's production of voluminous materials within days of key depositions has imposed a substantial burden on Georgia, which has been forced to hire over thirty new contract attorneys to facilitate expedited review of these materials in advance of depositions. Georgia now has nearly seventy full-time contract attorneys dedicated to review, many of whom are working overtime.

All told, over the last three months, Georgia has committed resources to review nearly 600,000 documents, or over 3.5 million pages, of Florida and Florida university productions, in addition to reviewing and finalizing the production of documents for its own custodians and other third parties.

C. Georgia Has Met and Conferred with Other Third Parties Regarding Collection and Production of Documents.

Georgia has continued to meet and confer with third parties in an effort to obtain responsive documents without imposing unnecessary burdens, and to schedule third-party depositions as needed. To date, Georgia has received nearly 1.7 million pages of documents from 34 nonparties in response to its subpoenas and has provided those documents to Florida. A chart of the nonparty documents Georgia has received and produced to date is attached as Exhibit A. Georgia believes it has now produced documents it has received from the third parties it subpoenaed.

D. Georgia's Production of Documents and Data to Florida.

Georgia completed its regular production of documents and data in response to Florida's document requests by producing approximately 190,000 pages of documents on November 10 and November 24, 2015. To date, Georgia has produced over 2.3 million pages of documents and 26 native models (approximately 240 GB of modeling files). Georgia has also produced six native databases or database reports pertaining to Permits, Safe Dams, Agricultural Metering, Monthly Operating Reports, Agricultural Permitting, and Geological Appraisal. Although Georgia's regular production is complete pursuant to the deadline set forth in the Case Management Plan, Georgia will continue to supplement productions to fulfill its obligations under the Case Management Plan and the federal rules, if and when such productions become necessary. For example, Georgia anticipates supplementing its production for individuals Florida has served with requests for production in advance of depositions.

E. Georgia Continues to Review and Analyze Documents and Data Produced by the United States.

The States have conferred with all federal agencies that received *Touhy* requests and subpoenas. Georgia believes that all federal agencies have now substantially completed their

productions and has identified those productions in previous status reports. Most recently, on September 30, 2015, the U.S. Army Corps of Engineers (“Army Corps”) produced a DVD of modeling files and electronically stored information related to the HEC-ResSim model and report used by the Corps for its draft Water Control Manual (“WCM”) released the same day. These materials are relevant to the hydrologic modeling the Army Corps conducted in connection with its updated WCM, which is now in the review and comment process with the deadline for comments extended by the Army Corps to January 15, 2016. Georgia is preparing comments to the updated WCM and expects to provide them to the Army Corps, with a copy to Florida, on January 15.

F. Deposition Discovery Between Parties.

Georgia and Florida continue to discuss the number, timing, and coordination of depositions of both State personnel and various third parties. Florida has served 39 notices or subpoenas and Georgia has served 42 notices or subpoenas.

To date, Florida has taken 11 depositions. Georgia has cooperated to schedule these depositions and to produce relevant documents for both Georgia custodians and, where applicable, former Georgia employees that have been requested in subpoenas duces tecum associated with those depositions. Georgia has taken 6 depositions.

The parties have agreed on scheduling for the majority of upcoming depositions. Before the end of December, Georgia is scheduled to take 5 additional depositions. Florida has elected to postpone most of the depositions it had scheduled for December into 2016 and has not scheduled any additional depositions in December. Georgia is attempting to work with Florida to spread the depositions evenly throughout the remaining discovery period and thus minimize any scheduling difficulties in February. To that effect, Georgia has asked Florida for December and January availability for a number of witnesses in hopes that the parties can even out the

deposition schedule and avoid back-loading in the schedule. To that end, Georgia is scheduled to take 6 depositions in January. Florida is currently scheduled to take 8 depositions in January. In February, Georgia is scheduled to take 7 depositions and Florida is scheduled to take 7 depositions. Parties have also scheduled depositions for several 30(b)(6) topics. There are 20 depositions left to be scheduled, including depositions of both party and non-party witnesses, but not including depositions of 6 federal agency officials served with *Touhy* requests, which are currently subject to objection. Of the depositions that remain to be scheduled, Georgia has provided dates for all of the Georgia witnesses within its control. Florida has yet to provide dates for several of the witnesses within its control, despite repeated requests from Georgia over the past few weeks.

Georgia also continues to have difficulty securing cooperation from Florida on designating witnesses in response to Georgia's 30(b)(6) notice. Although Florida has identified witnesses to testify on some topics, Florida has not identified witnesses for Topics 4b-6, which concern Florida's agricultural, municipal, and industrial water conservation and permitting practices—issues that are important to any request for equitable apportionment and therefore to Georgia's ability to prepare its defense. Florida appears to have selected witnesses to testify on these topics, as it has proposed dates for these witnesses, but it has yet to share this information with Georgia. Georgia hopes that Florida will disclose the identity of these witnesses soon so that Georgia may adequately prepare for those depositions, explore the witnesses' backgrounds, and be able to present them with documents that bear their name. Additionally, Florida has still not designated a witness for Topics 18, 19, 21-24, and 28g, which concern historic salinity levels of Apalachicola Bay, factors that influence those salinity levels, Florida's management of both oysters and other endangered species in the Bay, and the current status of those species

populations. Because these topics are at the core of Florida's alleged injury, Georgia needs Florida to propose witnesses to testify on these topics as soon as possible. During a meet-and-confer session on November 2, Florida committed to providing these dates within the next week, yet Georgia has still not received them nearly a month later. Florida has long objected to Georgia's 30(b)(6) topics on Florida's alleged injury but appears willing to designate a witness in some respect that is not yet clear, as discussed in more detail below in Section V.

Finally, Georgia and Florida have collectively noticed eight United States government officials with *Touhy* requests for depositions. The United States government objected to these *Touhy* requests in letters dated November 18 and November 24, 2015, on the ground that it is not a party to this litigation, that a day of testimony for each of the noticed witnesses would be burdensome, that granting the *Touhy* request in this case would encourage future requests in other types of proceedings, that *Touhy* testimony could suggest federal agency bias in favor of one state over the other, and that *Touhy* testimony would be duplicative of other deposition testimony. Georgia expects to meet and confer with federal officials to discuss the agencies' objections.

III. GEORGIA'S EFFORTS TO FACILITATE DISCOVERY

As of the last status report, Florida and Georgia were in the process of meeting and conferring about two models produced to Florida by Georgia Tech. Throughout the case, Georgia has endeavored to facilitate production of these complex models in a format that allows Florida and its experts to load and run the models in the same way they are used by the custodians from whom they were collected. When Florida had difficulty running two of the models, Georgia responded to informal requests by Florida and either reproduced the model or

provided Florida with additional information to facilitate its use of these models, rather than requiring Florida to seek outside assistance or serve additional discovery requests.

In addition, Georgia has been willing to work with Florida to assess on a case-by-case basis Florida's additional discovery requests, even after the formal close of written discovery. For example, after a recent deposition, Florida asked Georgia for data that the Georgia Soil and Water Conservation Commission ("GSWCC") had collected from its telemetry metering program. Georgia voluntarily searched through numerous folders in GSWCC's district offices and collected over 4000 different files that pertain to the data from telemetry meters. Because the files are in different formats and organized in different ways, Georgia is reviewing all the files to ensure they are the complete set of telemetry data and intends to make a production of the data set to Florida in the next week.

All of these efforts—which are only representative of Georgia's broader efforts—demonstrate Georgia's willingness to go beyond its discovery obligations and to work with Florida to facilitate discovery.

IV. ANTICIPATED DISCOVERY

Georgia anticipates conducting the following discovery in the next month:

- Supplementing its responses to Florida's interrogatories;
- Producing to Florida documents collected in response to Florida's subpoenas duces tecum to individual and university witnesses;
- Producing to Florida additional third-party documents produced to Georgia in response to its subpoenas;
- Continuing to confer with Florida about a deposition schedule and the identification of deponents to conduct deposition discovery in an orderly and efficient manner;
- Meeting and conferring with Florida to ensure that Florida provides critical 30(b)(6) witness information such as witness names and deposition dates;
- Continuing to confer with third parties about scheduling depositions;

- Taking and defending depositions.

V. UNRESOLVED DISPUTES AND OTHER CONCERNS

A. 30(b)(6) Witness on Injury.

As Georgia has stated before, injury is a threshold issue in this case. Before the Court considers equitable apportionment, Florida is required to prove that it is suffering some “real or substantial injury or damage” as a result of Georgia’s upstream water use. *Connecticut v. Massachusetts*, 282 U.S. 660, 672 (1931); *Colorado v. New Mexico*, 459 U.S. 76, 87 nn. 12 & 13 (1982). The parties met and conferred on this issue via telephone on November 12, 2015 and via email on November 22, November 24, and December 1, 2015. For the first time yesterday, Florida suggested it would produce a witness on these topics, but since Georgia had proposed revised topics, the scope of what Florida has agreed to is still unclear and likely requires additional discussion.

The 30(b)(6) topics in question request purely factual information about Florida’s alleged injury—focusing on animal and plant species, economic harm, and sociological harm alleged in the complaint—that should be readily available to Florida. Florida had objected on the ground that it need only respond via contention interrogatories or expert testimony, yet these topics call for purely factual information in the possession of Florida agencies and employees and Georgia is entitled to ask a witness follow-up questions on these central issues. The rules do not require Georgia to accept Florida’s untested interrogatory responses as the final word on these matters. Florida had also objected on overbreadth grounds—a misplaced objection since the harms about which Georgia seeks 30(b)(6) testimony are specifically identified in Florida’s complaint—but nevertheless Georgia has now proposed revised 30(b)(6) topics in an effort to compromise and move forward. Especially at this stage of the case, at the end of written discovery and nearing

the end of fact depositions, Georgia is entitled to prompt 30(b)(6) testimony on the factual basis for the specific injuries Florida is claiming in this case.

B. Dispute Regarding Professor Emails.

As stated in the last status report, the parties initially agreed that email production from professors at Georgia universities would not be required. Following the deposition of Dr. Martin Kistenmacher, a professor at Georgia Tech, Florida requested that Dr. Kistenmacher produce a single email folder identified by him during his deposition. Pursuant to the Special Master's October 12 order granting Florida's request, Georgia produced this single email folder on November 9, 2015. The Special Master's order noted the facts specific to its determination: that the folder could easily be accessed and had already been identified by Dr. Kistenmacher as being responsive and non-privileged.

As Georgia predicted at the time of Florida's motion to compel, Florida is now requesting that other, more voluminous email folders be collected from other professors—including some retired professors—despite the parties' original agreements that these productions were not necessary. These additional requests could impose substantial burdens on Georgia, requiring the collection and review of thousands of additional email files and attachments. Nonetheless, Georgia has agreed to meet and confer with Florida regarding a potential compromise, including the possible application of a set of search terms to narrow the universe of emails that would have to be reviewed or produced. Georgia hopes that parties can come to an agreement on these issues without consulting the Special Master.

Without waiving its objections to the production of professor emails, Georgia has already agreed to run a narrow set of search terms against Dr. Georgakakos's Georgia Tech email account and to produce responsive, non-privileged emails from that account on a rolling basis.

Since Florida is not scheduled to depose any other Georgia witnesses until January, it should have ample time to review this production.

C. Supplementation Of Responses Requested By Florida.

Georgia is currently in the process of following up on a number of discovery-related issues that Florida has recently raised, including: 1) running Florida's proposed search terms in Dr. Georgakakos's work-related email accounts; 2) assessing Florida's request for a 30(b)(6) deposition on the status of email records for past EPD directors; 3) preparing supplemental interrogatory responses relating to Georgia species; and 4) finalizing Georgia's privilege log for production to Florida. Georgia has notified Florida that it is working on these follow-up items and will continue to meet and confer with Florida on these and other ongoing discovery issues.

As Georgia has noted above, it has the following outstanding discovery-related requests to Florida: 1) supplementing responses to Georgia's interrogatories and requests for production; 2) providing notice and copies of any upcoming comments to the Army Corps on its Water Control Manual update; 3) identifying and scheduling witnesses in response to Georgia's 30(b)(6) notice; and 4) confirming availability for several witnesses subpoenaed by Georgia for depositions.

VI. MEDIATION

Consistent with Georgia's proposal in its last status report, the parties have exchanged the names of potential mediators, with both sides proposing a list of well-regarded attorneys capable of mediating a complex suit of this nature. The parties are currently evaluating the various mediator options. Georgia is ready to move forward expeditiously, agree on a mediator in the near term, and begin the process of working with the mediator on the timing and procedures for mediation. The parties will continue to meet and confer regarding potential mediator selection and process and will advise the Special Master once a mediator has been selected.

Dated: December 4, 2015

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EXHIBIT A

**DOCUMENTS RECEIVED FROM THIRD PARTIES IN RESPONSE TO GEORGIA'S
SUBPOENAS AND PRODUCED TO FLORIDA**

Third Party	Bates Range	Date Produced
Alligator Point Water Resources District	APWRD_00001 to APWRD_01177	July 1, 2015
Apalachicola Bay Oyster Dealers Association	ABODA_0001 to ABODA_0081	Apr. 30, 2015
Apalachicola Chamber of Commerce	ACOC_0001 to ACOC_0195	Apr. 30, 2015
Apalachicola Riverkeeper	AR_0001 to AR_0036	Apr. 30, 2015
	AR_0000037 to AR_0116946	July 27, 2015
	AR_0116947 to AR_0221940	Sept. 28, 2015
Bay County	BAY_CO.(FL)_00001 to BAY_CO.(FL)_00009	July 1, 2015
Calhoun County	CALHOUN_CO_0001 to CALHOUN_CO_0049	Apr. 30, 2015
City of Apalachicola	City_of_Apalachicola(FL)_0001 to City_of_Apalachicola(FL)_0617	Apr. 30, 2015
City of Blountstown	BLOUNTSTOWN(FL)_00001 to BLOUNTSTOWN(FL)_01557	May 29, 2015
City of Bristol	City_of_Bristol(FL)_0000001 to City_of_Bristol(FL)_0000998	July 27, 2015
City of Carrabelle	City_of_Carrabelle(FL)_0001 to City_of_Carrabelle(FL)_0020	Apr. 30, 2015
	City_of_Carrabelle(FL)_0021 to City_of_Carrabelle(FL)_1595	July 1, 2015
City of Chattahoochee	City_of_Chattahoochee(FL)_00001 to City_of_Chattahoochee(FL)_00136	May 29, 2015
City of Cottondale	COTTONDALE(FL)_00001 to COTTONDALE(FL)_00227	May 29, 2015
City of Marianna	City_of_Marianna(FL)_00001 to City_of_Marianna(FL)_00217	July 1, 2015
City of Port St. Joe	Port_St_Joe_0000001 to Port_St_Joe_0000486	July 27, 2015
City of Wewahitchka	Wewahitchka(FL)_0000001 to Wewahitchka(FL)_0003099	July 27, 2015
Florida State University	FL_State_Univ_00001 to FL_State_Univ_00050	May 29, 2015
	FL_State_Univ_00051 to FL_State_Univ_01377	Sept. 28, 2015
Florida Sea Grant	FL_SEA-GRANT_00001 to FL_SEA-GRANT_37355	Apr. 30, 2015
	FL_SEA-GRANT_37356 to FL_SEA-GRANT_56648	May 29, 2015
	FL_SEA-GRANT_56649 to FL_SEA-GRANT_56762	Sept. 28, 2015
Franklin County	FRANKLIN_CO_0001 to FRANKLIN_CO_5512	Apr. 30, 2015
Franklin Co. Seafood Workers Association	FCSWA_00001 to FCSWA_00005	May 29, 2015
	FCSWA_00006 to FCSWA_00017	July 1, 2015

Third Party	Bates Range	Date Produced
Gadsden County	Gadsden_Co_0001 to Gadsden_Co_0015	Apr. 30, 2015
Gulf County	Gulf_County(FL)_00001 to Gulf_County(FL)_00194	Nov. 6, 2015
Jackson County	JACKSON_CO_0001 to JACKSON_CO_0062	Apr. 30, 2015
Jacob City	JACOB_CITY(FL)_00001 to JACOB_CITY(FL)_00309	July 1, 2015
Liberty County	Liberty_Co_0001 to Liberty_Co_0804	Apr. 30, 2015
Lighthouse Utility Co.	Lighthouse_Util_Co.(FL)_00001 to Lighthouse_Util_Co.(FL)_00581	July 1, 2015
Town of Alford	Town_of_Alford(FL)_00001 to Town_of_Alford(FL)_00480	May 29, 2015
Town of Altha	TOWN_OF_ALTHA(FL)_00001 to TOWN_OF_ALTHA(FL)_00163	July 1, 2015
Town of Greenwood	Town_of_Greenwood(FL)_0000001 to Town_of_Greenwood(FL)_0000019	July 27, 2015
Town of Malone	Town_of_Malone(FL)_00001 to Town_of_Malone(FL)_00181	May 29, 2015
	Town_of_Malone(FL)_00182 to Town_of_Malone(FL)_00284	July 27, 2015
Town of Sneads	SNEADS_0001 to SNEADS_0802	Apr. 30, 2015
St. James Island Utility Company Water Treatment Plant	SJIUC_0001 to SJIUC_0153	Apr. 30, 2015
University of Florida	UFL_0001 to UFL_0858	Apr 30, 2015
	UFL_00859 to UFL_01592	May 29, 2015
	UFL_00001593 to UFL_00846570	Sept. 22, 2015
	UFL_00846571 to UFL_01432034	Sept. 28, 2015
	UFL_01432035 to UFL_01432069	Nov. 6, 2015
	UFL_01432070 to UFL_01432134	Nov. 30, 2015
Washington County	Washington_Co.(FL)_00001 to Washington_Co.(FL)_00113	May 29, 2015
Water Management Services, Inc.	Water_Mgmt_Servs(FL)_0000001 to Water_Mgmt_Servs(FL)_0001071	July 27, 2015
	Water_Mgmt_Servs(FL)_0001072 to Water_Mgmt_Servs(FL)_0002133	Sept. 28, 2015

EXHIBIT B**GEORGIA'S PRODUCTIONS**

Production Number	Bates Range	Production Type	Date Produced
First	GA00000001 to GA00000008	7 Models (4.4 GB), 1 Database	Feb. 6, 2015
Second	GA00000009 to GA00013500	Electronically Stored Information	Feb. 10, 2015
Third	GA00013501 to GA00041516	Electronically Stored Information, 2 Databases	Mar. 6, 2015
Fourth	GA00041517	1 Database	Mar. 27, 2015
Fifth	GA00041518 to GA00041989	Electronically Stored Information	Apr. 2, 2015
Sixth	GA00041990 to GA00208007	9 Models (78 GB), Electronically Stored Information and Paper Records	Apr. 3, 2015
Seventh	GA00208008 to GA00208010	3 Models (4.3 GB)	Apr. 30, 2015
Eighth	GA00208011 to GA00338078	Electronically Stored Information and Paper Records	May 1, 2015
Ninth	GA00338079	1 Model (2.5 GB)	May 29, 2015
Tenth	GA00338080 to GA00596884	Electronically Stored Information and Paper Records	June 4, 2015
Eleventh	GA00596885 to GA00596886	1 Database & 1 Database Report	June 15, 2015
Twelfth	GA00596887 to GA00646491	Electronically Stored Information and Paper Records	June 22, 2015
Thirteenth	GA00646492 to GA00865658	Electronically Stored Information and Paper Records	July 7, 2015
Fourteenth	GA00865659 to GA00865664	6 Models (149 GB)	August 5, 2015
Fifteenth	GA00865665 to GA01382872	Electronically Stored Information and Paper Records	August 5, 2015
Sixteenth	GA01382873 to GA01827401	Electronically Stored Information and Paper Records	Aug. 26, 2015
Seventeenth	GA01827402 to GA02052890	Electronically Stored Information and Paper Records	Sept. 9, 2015
Eighteenth	GA02052891 to GA02126195	Electronically Stored Information and Paper Records	Oct. 1, 2015
Nineteenth	GA02126196 to GA02316611	Electronically Stored Information and Paper Records	Nov. 10, 2015
Twentieth	GA02316612 to GA02323632	Electronically Stored Information and Paper Records	Nov. 10, 2015

Production Number	Bates Range	Production Type	Date Produced
Twenty First	GA02323633 to GA02337223	Electronically Stored Information and Paper Records	Nov. 24, 2015

CERTIFICATE OF SERVICE

This is to certify that the DECEMBER 4, 2015 STATUS REPORT OF THE STATE OF GEORGIA has been served on this 4th day of December 2015, in the manner specified below:

<p><u>For State of Florida</u></p> <p><u>By U.S. Mail and Email</u></p> <p>Allen Winsor Solicitor General Counsel of Record Office of Florida Attorney General The Capital, PL-01 Tallahassee, FL 32399 T: 850-414-3300 allen.winsor@myfloridalegal.com</p>	<p><u>For United States of America</u></p> <p><u>By U.S. Mail and Email</u></p> <p>Donald J. Verrilli Solicitor General Counsel of Record Department of Justice 950 Pennsylvania Avenue, N.W. Washington, DC 20530 T: 202-514-7717 supremectbriefs@usdoj.gov</p>
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<p><u>For State of Georgia</u></p> <p><u>By Email Only</u></p> <p>Samuel S. Olens Nels Peterson Britt Grant Sarah H. Warren Seth P. Waxman Craig S. Primis K. Winn Allen georgiawaterteam@kirkland.com</p>	<p><i>/s/ Craig S. Primis</i></p> <hr/> <p>Craig S. Primis <i>Counsel of Record</i> KIRKLAND & ELLIS LLP 655 Fifteenth Street, NW Washington, DC 20005 T: 202-879-5000 craig.primis@kirkland.com</p>