		I elephone Cor	iterence - 3/	8/16	Florida v. Georgia
					3
			1	Georgia. I have the Solicitor Genera	
		1	2	Georgia, Britt Grant, on the line as w	
	SUPREME COURT OF T		3	and two of my colleagues, Winn Alle	n and
	No. 142, Or	riginal	4	Devora Allon.	
	STATE OF FLORIDA,)		5	SPECIAL MASTER LANCASTER:	United
	Plaintiff,)		6	States?	
	v.)		7	MR. DUBOIS: Good morning, y	our Honor.
	STATE OF GEORGIA,)) Defendants.)		8	This is Jim James Dubois from the	9
			9	Department of Justice.	
	TELEPHONE CONFERENCE RALPH I. LANCASTER, held at	before SPECIAL MASTER	10	SPECIAL MASTER LANCASTER:	Good morning.
		Nharf, 254 Commercial Street,	11	Is there anyone else on?	
	Portland, Maine, on March 8	3, 2016, commencing at	12	All right.	
	10:00 a.m., before Claudett		13	MS. WARREN: Sarah Warren is	here from
	Notary Public in and for th APPEARANCES:	ne State of Maine.	14	Georgia as well, the Deputy Solicitor	r
	For the State of Florida:	PHILIP J. PERRY, ESQ.	15	General.	
		ALLEN C. WINSOR, ESQ. JONATHAN L. WILLIAMS, ESQ. MATTHEW Z. LEOPOLD, ESQ.	16	SPECIAL MASTER LANCASTER:	Thank you.
			17	Anyone else?	
	For the State of Georgia:	CRAIG S. PRIMIS, ESQ. K. WINN ALLEN, ESQ. DEVORA W. ALLON, ESQ.	18	MR. LEOPOLD: Matt Leopold, S	tate of
		BRITT GRANT, ESQ. SARAH HAWKINS WARREN, ESQ.	19	Florida, is on the line, your Honor.	
	For the U.S.A.:	JAMES J. DUBOIS, ESQ.	20	SPECIAL MASTER LANCASTER:	Thank you.
	Also Present:	MARY CLIFFORD	21	Anyone else?	
			22	All right. Let me ask, as we alw	ays do,
	THE REPORTING		23	do you have any additions to your p	rogress
	Mason & Lockh	hart	24	reports, Mr. Perry?	
			25	MR. PERRY: No, your Honor. T	here may
				THE REPORTING GROUP	
				Mason & Lockhart	
		2			4
1	<u>PROCEEDINGS</u>		1	be a couple things I would like to co	
2		NCASTER: Good morning,	2	towards the end of the call about ou	
3	counsel.		3	opponent's progress report, but not	-
4	MR. PERRY: Good m		4	addition to what we put in for our po	
6	MR. PRIMIS: Good m		5 6	SPECIAL MASTER LANCASTER:	Ana,
7		morning, your Honor.	8	Mr. Primis?	
	MS. GRANT: Good m			MR. PRIMIS: No, your Honor.	All right
8 9	our case manager, Josh E	NCASTER: This morning	8 9	SPECIAL MASTER LANCASTER: Thank you.	All right.
10	another jurisdiction taking		10	Let me begin by congratulating	VOU
11	we have the very valuable		10	counsel, again on your cooperative	
12	you're familiar with, and,		12	resolve your discovery disputes. Wi	
13	always, our wonderful rep		13	would expect nothing less from cour	
14	Mason.		14	your caliber, I'm very appreciative o	
15	Let's begin, as we alv	ways do, bv	15	efforts.	,
16	entering appearances. Fl		16	Now, is there anything else that	we
17	MR. PERRY: Your Ho		17	should discuss?	
18	for Florida. And with me		18	Florida? Mr. Perry?	
19	Allen Winsor, the Solicitor		19	MR. PERRY: Your Honor, if I mi	ght, I
20	Jonathan Williams.		20	would like to raise the prospect that	
21	SPECIAL MASTER LAN	NCASTER: Thank you,	21	at some point in the coming months	-
22	Mr. Perry.		22	brief this issue of burden in this mat	
23	Georgia?		23	because I think we have a dispute, i	if I'm
24	MR. PRIMIS: Your He	onor, this is Craig	24	understanding Georgia's position co	rrectly,
25	Primis from Kirkland & Ell	lis for the State of	25	on who bears the burden for what is	sues in
1			1		
1	THE REPORTING O	GROUP		THE REPORTING GROUP	
	THE REPORTING G Mason & Lockhart			Mason & Lockhart	

	5		7
1	this case.	1	Florida's take on it.
2	In our status report, we cited the case	2	Your Honor is correct that we would need
3	Colorado versus New Mexico from 1984.	3	an opportunity to discuss it among the
4	There's, in fact, two of those cases. One is	4	parties. But, more fundamentally, these
4 5	in 1982. And I think it's fair to say they	4 5	types of burden issues and burden disputes
	both are the most recent statements by the		typically are briefed in the context of
6	Supreme Court on who bears the burden in	6	
7	•	7	summary judgment where there is an actual
8	equitable apportionment actions. And in both	8	factual record and evidence that can be
9	cases, including in footnote 13 of 459 U.S.	9	weighed. It's more concrete in that regard
10	176 in 1982, the Supreme Court describes how	10	rather than just abstraction. And we
11	the burden shifts once the downstream state	11	think we'll see what Florida has in mind;
12	has made a showing that it's been injured.	12	and I'm sure we'll talk about it in coming
13	And under those circumstances, the burden	13	weeks and months, but at this point it just
14	shifts to the upstream diverter to prove that	14	seems premature. And I think Mr. Perry even
15	its diversion, either present or future	15	indicated as much before the other expert
16	diversion, would be reasonable, justifiable	16	reports have been produced and provided and
17	and equitable.	17	we have a fuller record in terms of discovery
18	Of course, this case is somewhat	18	and expert work.
19	different than Colorado versus New Mexico	19	So, really, just note we note and we
20	because both of the states here are riparian	20	understand that that's an issue Florida has
21	rights states; and both in that case were	21	raised. We will discuss it with them. But,
22	prior appropriation states.	22	ultimately, we may come back and say that it
23	But I think as this case goes forward,	23	should be briefed up either in the context of
24	it may be quite important to resolve this	24	summary judgment or pretrial briefing when
25	burden shifting issue. And we are pleased at	25	it's ripe.
20	THE REPORTING GROUP	20	THE REPORTING GROUP
	Mason & Lockhart		Mason & Lockhart
	6		0
	6		SPECIAL MACTER LANCACTER, Therefore
1	an appropriate juncture to brief that. And	1	SPECIAL MASTER LANCASTER: Thank you.
2	an appropriate juncture to brief that. And there may be a need to brief it in the coming	2	SPECIAL MASTER LANCASTER: Thank you. That issue will be addressed if you
2 3	an appropriate juncture to brief that. And there may be a need to brief it in the coming months, and so we would welcome that	2 3	SPECIAL MASTER LANCASTER: Thank you. That issue will be addressed if you can't resolve it in due course. But I'm
2 3 4	an appropriate juncture to brief that. And there may be a need to brief it in the coming months, and so we would welcome that opportunity. But we're also flexible.	2 3 4	SPECIAL MASTER LANCASTER: Thank you. That issue will be addressed if you can't resolve it in due course. But I'm hopeful, again, that you can in a meet and
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	Telephone Con	lierenc	•
	9	1	11
1	on the river and in the bay, and that	1	pre-existing models that all sides have
2	Georgia can comply with such a consumption	2	worked with and agree are the right way to
3	cap through a series of reasonable cost	3	go. In many fundamental respects, Florida
4	measures of the types other states already	4	has designed new models, has created new data
5	implement.	5	sets, and are applying the the raw
6	I would not have ordinarily made a	6	material in ways that have not been applied
7	merits argument in this context, but given	7	before either by the U.S. Army Corps or the
8	that these proceedings are public and that	8	State of Georgia. So it is a significant
9	Georgia has done so, we felt compelled to	9	amount of effort even just to understand the
10	respond briefly.	10	bases for their opinions and to break down
11	SPECIAL MASTER LANCASTER: Thank you.	11	and evaluate these models.
12	Mr. Primis?	12	We have been, I think, very disciplined
13	MR. PRIMIS: Your Honor, no response on	13	in terms of when we come to the Special
14	that. We wanted to notify the Court as to	14	Master and ask for additional time; and we
	-		are keenly aware of the Special Master's
15	the issue that we had provided our report on.	15	
16	And obviously we will respond to the points	16	desire to move this case along. And at each
17	made in their expert reports. We disagree	17	juncture, we need to balance that with the
18	with them, and the facts will bear out our	18	need to do the analysis correctly and
19	position. But I don't know that we need to	19	properly and to ask for and, hopefully,
20	debate the merits in the context of this	20	receive the amount of time we feel in good
21	call.	21	faith that we need.
22	SPECIAL MASTER LANCASTER: All right.	22	And just given the magnitude and the
23	Thank you very much.	23	diversity and the number of these reports and
24	And thank you again, both of you, for	24	the types of analyses, we wanted to
25	your progress reports.	25	underscore that we view the requested
	THE REPORTING GROUP		THE REPORTING GROUP
	Mason & Lockhart		Mason & Lockhart
	40		10
	10		12
1	10 MR. PRIMIS: Your Honor?	1	12 extension as as significant and very
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2	MR. PRIMIS: Your Honor? SPECIAL MASTER LANCASTER: Yes?	2	extension as as significant and very important to our development of our defense.
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	I elephone Cor		
	17		19
1	Florida did produce its 20 reports, the	1	request.
2	experts working on those reports had been	2	I am not prepared to grant any extension
3	preparing those analyses for many months.	3	today. From prior conferences you know that
4	Some of them have been working on them for	4	I'm very reluctant to extend this marathon.
5	many years. There are some experts who	5	Very early on and, again, as recently as
6	identified being retained as early as 2012.	6	last month I suggested that you meet and
7	So there are new models. Some of them	7	confer on limiting the scope of discovery to
8	conducted lengthy and time-consuming surveys.	8	the basic, hard-core issues you believe
9	There's just a lot of work that was done, and	9	necessary to inform judgment. Instead, as
10	it was done in much more than 45 days.	10	reflected, once again, in these progress
11	Obviously we have done some preliminary	11	reports, both sides have plunged even deeper
12	thinking and work, but we have only seen what	12	into discovery of hundreds, perhaps
13	Florida's position is on all these issues now	13	thousands, of complex issues that will
14	for a week. And even just getting your arms	14	ultimately be left on the wayside, millions
15	around it and evaluating what needs to be	15	of pages of hard copies and hundreds of
16	responded to is quite time consuming.	16	gigabytes of electronic files.
17	So we appreciate Florida's agreement	17	As you well know, I have been harping on
18	that some extension is warranted. We think	18	settlement from the beginning of this
19	that an additional 20 days beyond what they	19	process. Much to my delight, in its November
20	have proposed is fair.	20	progress report, Georgia suggested mediation
21	And as I said, we would not object to	21	and Florida agreed. Four months have gone
22	Florida getting some additional time if they	22	by; and the most you can tell me and I'm
23	feel they need it after they receive our	23	quoting now from your progress reports is,
24	reports. And, in fact, we put that in our	24	quote, the mediation process is underway,
25	proposal. And we wouldn't if they feel	25	unquote, and that you have, quote, agreed to
	THE REPORTING GROUP		THE REPORTING GROUP
	Mason & Lockhart		Mason & Lockhart
	18		20
1	that's insufficient, wouldn't object to an	1	a basic framework, unquote.
2	additional amount of time that's commensurate	2	Let me suggest and I hope I'm not
3	to what we're asking for.	3	being too unkindly here, that if you had
4	So that's all I have to say on that	4	
	,	-	invested up to 10 percent of the effort and
5	issue.	5	invested up to 10 percent of the effort and time and expense you have used in discovery
5 6	· · · · · · · · · · · · · · · · · · ·		
-	issue.	5	time and expense you have used in discovery
6	issue. SPECIAL MASTER LANCASTER: Mr. Perry,	5 6	time and expense you have used in discovery on mediation, we would not be here spinning
6 7	issue. SPECIAL MASTER LANCASTER: Mr. Perry, anything further on this issue?	5 6 7	time and expense you have used in discovery on mediation, we would not be here spinning our wheels.
6 7 8	issue. SPECIAL MASTER LANCASTER: Mr. Perry, anything further on this issue? MR. PERRY: No further response, your	5 6 7 8	time and expense you have used in discovery on mediation, we would not be here spinning our wheels. At the next call I expect to have
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1	MR. PRIMIS: Thank you, your Honor.
2	(The telephone conference was concluded
3	at 10:21 a.m.)
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	THE REPORTING GROUP
	Mason & Lockhart
1	22 CERTIFICATE
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2 3	<u>CERTIFICATE</u> I, Claudette G. Mason, a Notary Public in and for the State of Maine, hereby certify
2 3 4	<u>CERTIFICATE</u> I, Claudette G. Mason, a Notary Public in and for the State of Maine, hereby certify that the foregoing 21 pages are a correct
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23

1	22:9	5:22	16:22	contrary [1] - 8:19
	abstraction [1] - 7:10	April [6] - 6:7, 10:11,	Case [4] - 13:5, 14:21,	cooperative [1] - 4:11
10 [4] - 14:5, 15:9,	action [1] - 22:9	13:11, 14:4, 15:9,	16:1	copies [1] - 19:15
16:13, 20:4	actions [1] - 5:8	18:13	cases [2] - 5:4, 5:9	copy [1] - 10:20
10:00 [1] - 1:13	actual [3] - 7:7, 20:9,	argument [2] - 8:14,	certainly [1] - 10:8	core [1] - 19:8
10:21 [1] - 21:3 10th [1] - 22:11	20:12	9:7	CERTIFICATE [1] -	Corps [1] - 11:7
13 [1] - 5:9	addition [2] - 4:4,	arguments [1] - 16:2	22:1	correct [2] - 7:2, 22:4
13 [1] - 5.9 14 [6] - 6:7, 10:11,	10:25	arms [1] - 17:14	certify [2] - 22:3, 22:7	correctly [2] - 4:24,
13:11, 14:5, 15:9,	additional [9] - 8:23,	Army [1] - 11:7	change [1] - 15:13	11:18
18:13	11:14, 12:13, 13:9, 16:19, 16:22, 17:19,	attention [1] - 6:9	circumstances [2] -	cost [1] - 9:3
142 [1] - 1:1	17:22, 18:2	Atwood [1] - 1:11 aware [1] - 11:15	5:13, 14:14 cited [1] - 5:2	counsel [6] - 2:3,
16 [1] - 15:11	additions [1] - 3:23	aware[1]-11.15	Claudette [3] - 1:13,	4:11, 4:13, 6:11, 18:11, 20:19
176 [1] - 5:10	address [5] - 6:16,	В	2:13, 22:2	couple [2] - 4:1, 15:20
1982 [2] - 5:5, 5:10	6:17, 8:12, 8:15,	D	clear [3] - 15:21,	course [9] - 2:12,
1984 [1] - 5:3	18:20	balance [1] - 11:17	20:13, 20:16	5:18, 6:11, 8:3,
	addressed [2] - 8:2,	ball [1] - 18:11	CLIFFORD [1] - 1:23	13:15, 13:20, 14:2,
2	12:22	bases [1] - 11:10	Clifford [1] - 2:11	14:7, 14:20
	adjourned [1] - 20:23	basic [2] - 19:8, 20:1	cognizant [1] - 12:16	COURT [1] - 1:1
20 [9] - 8:16, 10:14,	advocated [1] - 16:7	basis [1] - 18:16	colleagues [1] - 3:3	Court [4] - 5:7, 5:10,
14:7, 16:5, 16:9, 16:19, 16:22, 17:1,	ago [1] - 13:4	bay [1] - 9:1	Colorado [2] - 5:3,	9:14, 12:7
16:19, 16:22, 17:1, 17:19	agree [1] - 11:2	bear [4] - 9:18, 13:14,	5:19	Court's [2] - 6:9, 13:5
2012 [1] - 17:6	agreeable [1] - 16:13	13:21, 15:21	coming [3] - 4:21, 6:2,	Craig [2] - 2:24, 10:3
2016 [3] - 1:12, 6:7,	agreed [2] - 19:21,	bears [3] - 4:25, 5:7,	7:12	CRAIG [1] - 1:19
22:11	19:25	15:3	commencing [1] -	created [1] - 11:4
2019 [1] - 22:19	agreement [1] - 17:17	becomes [1] - 6:8	1:12	CRR [1] - 1:13
21 [1] - 22:4	agricultural [1] - 8:22	begin [2] - 2:15, 4:10	commensurate [1] -	crystal [1] - 18:11
254 [1] - 1:11	ALLEN [2] - 1:16, 1:19	beginning [1] - 19:18	18:2	current [1] - 13:10
	Allen [2] - 2:19, 3:3	benefit [1] - 8:25	comment [2] - 4:1,	
3	ALLON [1] - 1:20	between [1] - 8:5 beyond [1] - 17:19	12:25	D
_	Allon [1] - 3:4	biologists [1] - 8:18	Commercial [1] - 1:11	data [2] - 10:21, 11:4
3 [1] - 13:24	amount [7] - 10:21,	break [1] - 11:10	Commission [1] -	days [6] - 14:15,
30 [3] - 12:3, 14:6,	11:9, 11:20, 12:5,	brief [4] - 4:22, 6:1,	22:18	14:16, 16:19, 16:23,
14:16	12:10, 14:8, 18:2	6:2, 18:23	compelled [1] - 9:9	17:10, 17:19
30th [1] - 14:13	ample [1] - 12:15	briefed [2] - 7:6, 7:23	completing [1] - 14:11	deadline [13] - 6:6,
Λ	amplify [1] - 10:6 analyses [2] - 11:24,	briefing [1] - 7:24	complex [2] - 12:18, 19:13	10:10, 12:22, 13:10,
4	17:3	briefly [2] - 8:15, 9:10	comply [1] - 9:2	13:12, 13:15, 14:5,
4 [1] - 13:24	analysis [2] - 11:18,	briefs [1] - 6:15	concern [2] - 13:19,	14:12, 14:13, 15:2,
45 [1] - 17:10	12:18	BRITT [1] - 1:20	14:12	15:9, 15:10, 18:13
459 [1] - 5:9	analyze [1] - 14:16	Britt [1] - 3:2	concluded [1] - 21:2	debate [1] - 9:20
	anticipate [1] - 10:14	broken [1] - 18:11	concrete [1] - 7:9	decided [1] - 15:1
6	anticipated [3] -	burden [21] - 4:22,	conducted [1] - 17:8	decides [1] - 14:17
60 [2] - 14:14, 14:15	10:12, 13:5, 14:1	4:25, 5:7, 5:11, 5:13,	confer [3] - 6:12, 8:5,	deem [1] - 16:20
vv[2] - 17.17, 17.10	Apalachicola [1] -	5:25, 6:8, 6:18, 6:23,	19:7	deeper [1] - 19:11
8	8:24	7:5, 10:15, 13:3,	conference [2] -	Defendants [1] - 1:7
	appearances [1] -	13:15, 13:22, 14:24,	20:11, 21:2	defense [1] - 12:2
8 [2] - 1:12, 18:12	2:16	15:4, 15:21, 16:3,	CONFERENCE [1] -	defenses [2] - 13:21,
	APPEARANCES [1] -	18:15, 18:21	1:9	13:24
9	1:15	<u>^</u>	conferences [1] - 19:3	defensive [1] - 13:17
9 [1] - 22:19	applied [1] - 11:6	C	congratulating [1] -	delight [1] - 19:19
	applying [1] - 11:5	caliber [1] - 4:14	4:10	Department [1] - 3:9
Α	apportionment [1] -	candidly [1] - 12:4	conservative [1] -	depose [1] - 14:17 depositions [2] - 2:10,
	5:8	cap [2] - 8:20, 9:3	12:8	14:11
a.m [2] - 1:13, 21:3	appreciate [2] - 16:12,	captioned [1] - 22:6	consuming [2] - 17:8,	Deputy [1] - 3:14
able [2] - 6:13, 18:18	17:17	case [13] - 2:9, 5:1,	17:16	describes [1] - 5:10
above-captioned [1] -	appreciative [1] - 4:14	5:2, 5:18, 5:21, 5:23,	consumption [3] -	designated [1] - 14:22
22:6	appropriate [2] - 6:1,	10:14, 11:16, 13:21,	8:21, 9:2	designed [1] - 11:4
above-named [1] -	16:20 THI	E REPORTING G	ROUP):20	desire [1] - 11:16
	appropriation [1]		1.20	
	V	lason & Lockha	ртт	

7 of 10 sheets

Mason & Lockhart —

The Reporting Group (207) 797-6040

24

development [1] -	1:17, 1:17, 1:19,	FLORIDA [1] - 1:3	3:7, 3:19, 3:25, 4:7,	11:17
12:2	1:19, 1:20, 1:20,	Florida [15] - 1:16,	4:19, 6:20, 7:2, 8:11,	June [1] - 22:19
DEVORA [1] - 1:20	1:21, 1:22	2:16, 2:18, 3:19,	9:13, 10:1, 10:9,	jurisdiction [1] - 2:10
Devora [1] - 3:4	essentially [1] - 8:13	4:18, 7:11, 7:20,	13:1, 14:3, 14:19,	Justice [1] - 3:9
differences [1] - 6:13	establish [2] - 8:18,	8:25, 11:3, 12:12,	15:7, 15:19, 18:9,	justifiable [1] - 5:16
different [1] - 5:19	15:23	16:2, 16:20, 17:1,	20:14, 20:17, 20:20,	Jac.
disagree [2] - 6:25,	evaluate [3] - 10:24,	17:22, 19:21	20:21, 20:25, 21:1	К
9:17	11:11, 12:17	Florida's [3] - 7:1,	hope [2] - 12:21, 20:2	ĸ
	evaluating [1] - 17:15	17:13, 17:17	hopeful [2] - 6:11, 8:4	keenly [1] - 11:15
disagreement [1] - 6:23	event [1] - 22:8	flows [2] - 8:23, 8:24	hopefully [1] - 11:19	Kirkland [1] - 2:25
	evidence [1] - 7:8	footnote [1] - 5:9	hundreds [2] - 19:12,	
disciplined [1] - 11:12		foregoing [1] - 22:4	19:15	L
discovery [6] - 4:12,	examples [1] - 18:25		hydrologists [1] -	_
7:17, 14:10, 19:7,	excuse [1] - 8:21	forward [3] - 5:23, 13:25, 15:3	8:17	LANCASTER [23] -
19:12, 20:5	existing [1] - 11:1		8.17	1:10, 2:2, 2:8, 2:21,
discretion [1] - 16:15	expect [4] - 4:13, 16:8,	four [1] - 19:21		3:5, 3:10, 3:16, 3:20,
discuss [3] - 4:17, 7:3,	20:8, 20:11	framework [1] - 20:1	I	4:5, 4:8, 6:10, 8:1,
7:21	expected [1] - 13:25	frankly [1] - 6:24	identified [1] - 17:6	9:11, 9:22, 10:2,
discussions [1] -	expedition [1] - 12:16	free [1] - 6:14	identify [1] - 14:18	10:8, 12:24, 15:16,
12:11	expeditiously [1] -	front [1] - 18:17	imminent [1] - 10:10	18:6, 18:10, 20:15,
disinterested [1] -	12:7	full [1] - 12:10	implement [1] - 9:5	20:18, 20:22
22:8	expense [1] - 20:5	fuller [1] - 7:17	important [3] - 5:24,	last [1] - 19:6
dispute [1] - 4:23	expert [15] - 7:15,	fully [1] - 18:25	12:2, 12:21	latter [1] - 15:2
disputes [2] - 4:12,	7:18, 9:17, 10:13,	fundamental [1] - 11:3	imposes [1] - 10:15	law [1] - 1:10
7:5	10:14, 12:18, 13:7,	fundamentally [1] -	IN [1] - 22:10	left [1] - 19:14
distribute [1] - 10:22	13:17, 13:23, 14:1,	7:4		lengthy [1] - 17:8
diversion [2] - 5:15,	14:8, 15:14, 15:25,	future [2] - 5:15, 13:11	including [2] - 5:9,	Leopold [1] - 3:18
5:16	16:5, 16:9		8:22	LEOPOLD [2] - 1:17,
diversity [1] - 11:23	experts [8] - 8:16,	G	indeed [2] - 8:23,	3:18
diverter [1] - 5:14	10:23, 14:2, 14:17,	_	14:25	less [1] - 4:13
done [4] - 9:9, 17:9,	14:20, 15:1, 17:2,	General [3] - 2:19, 3:1,	indicated [1] - 7:15	likewise [1] - 12:12
17:10, 17:11	17:5	3:15	inform [1] - 19:9	limiting [1] - 19:7
down [2] - 11:10, 16:4	Expires [1] - 22:18	GEORGIA [1] - 1:6	information [1] -	line [2] - 3:2, 3:19
downstream [1] - 5:11	explained [1] - 18:25	Georgia [13] - 1:19,	16:17	LLP [1] - 1:11
dozens [1] - 14:11	extend [1] - 19:4	2:23, 3:1, 3:2, 3:14,	injured [1] - 5:12	load [1] - 10:23
DUBOIS [2] - 1:22, 3:7	extension [7] - 12:1,	9:2, 9:9, 10:4, 11:8,	instead [1] - 19:9	logistical [1] - 10:16
Dubois [1] - 3:8	14:4, 16:18, 17:18,	13:7, 14:17, 15:1,	insufficient [1] - 18:1	logistics [1] - 10:10
due [1] - 8:3	18:16, 18:20, 19:2	19:20	invested [1] - 20:4	
Dunlap [1] - 2:9	extensive [1] - 10:17	Georgia's [4] - 4:24,	irrigation [1] - 8:22	looking [1] - 16:5
during [1] - 14:9		8:13, 8:19, 8:20	issue [16] - 4:22, 5:25,	NA
uunng [i] - 14.8	F	gigabytes [1] - 19:16	6:8, 6:23, 7:20, 8:2,	М
E	_	given [4] - 9:7, 11:22,	9:15, 10:6, 10:11,	magnitude [2] - 11:22,
	fact [3] - 5:4, 14:10,	12:5, 16:16	12:21, 13:3, 14:20,	16:17
early [2] - 17:6, 19:5	17:24	glad [1] - 16:16	14:24, 15:18, 18:5,	Maine [3] - 1:12, 1:14,
effort [2] - 11:9, 20:4	facts [1] - 9:18	GRANT [2] - 1:20, 2:7	18:7	22:3
efforts [2] - 4:11, 4:15	factual [1] - 7:8	Grant [1] - 3:2	issues [8] - 4:25, 7:5,	Management [4] -
either [3] - 5:15, 7:23,	fair [3] - 5:5, 14:8,	grant [1] - 19:2	13:14, 15:22, 16:22,	13:5, 14:21, 16:1
11:7	17:20		17:13, 19:8, 19:13	manager [1] - 2:9
electronic [1] - 19:16	faith [1] - 11:21	н		marathon [1] - 19:4
Ellis [1] - 2:25	familiar [1] - 2:12		J	March [3] - 1:12,
encouraged [1] -	far [1] - 13:22	hand [1] - 22:10	_	18:12, 22:11
16:12	felt [1] - 9:9	hard [2] - 19:8, 19:15	JAMES [1] - 1:22	MARY [1] - 1:23
end [2] - 4:2, 15:13	few [2] - 8:12, 13:4	hard-core [1] - 19:8	James [1] - 3:8	Mary [1] - 1.23
endeavor [1] - 10:17	file [2] - 6:14, 18:23	harping [1] - 19:17	Jim [1] - 3:8	
ended [1] - 10:5	filed [1] - 16:1	HAWKINS [1] - 1:21	JONATHAN [1] - 1:17	Mason [3] - 1:13, 2:14, 22:2
engaged [1] - 14:10	files [1] - 19:16	hear [1] - 16:16	Jonathan [1] - 2:20	
	fine [2] - 8:8, 14:4	held [1] - 1:10	Josh [1] - 2:9	Master [3] - 11:14,
entail [1] - 12:6	first [1] - 6:24	hereby [1] - 22:3	judgment [3] - 7:7,	16:6, 16:14
entering [1] - 2:16	five [2] - 13:20, 13:23	hold [1] - 15:1	7:24, 19:9	MASTER [23] - 1:9,
equitable [2] - 5:8,	flag [1] - 12:20	Honor [29] - 2:4, 2:5,	July [1] - 15:13	2:2, 2:8, 2:21, 3:5,
5:17		E REPORTING G	ROUP re [2] - 6:1,	3:10, 3:16, 3:20, 4:5,
ESQ [10] - 1:16, 1:16,		- -		4:8, 6:10, 8:1, 9:11,
 [.0]0,0,			•	

25

9:22, 10:2, 10:8,	necessary [1] - 19:9	2:4, 2:17, 3:25, 4:19,	4:3, 8:9, 9:25, 19:10,	repeat [1] - 20:10
12:24, 15:16, 18:6,	need [13] - 4:21, 6:2,	8:11, 13:1, 18:8,	19:20, 19:23, 20:9,	report [10] - 4:3, 5:2,
18:10, 20:15, 20:18,	7:2, 9:19, 11:17,	20:14, 20:20, 20:25	20:12	6:25, 8:13, 8:19,
20:22	11:18, 11:21, 12:9,	Perry [12] - 2:17, 2:22,	proof [2] - 15:4, 15:22	9:15, 10:7, 10:12,
Master's [1] - 11:15	12:16, 15:12, 16:9,	3:24, 4:18, 7:14,	properly [1] - 11:19	13:23, 19:20
		8:10, 12:24, 15:20,		
material [1] - 11:6	16:11, 17:23		proposal [2] - 15:8,	reporter [1] - 2:13
matt [1] - 3:18	needs [2] - 17:15,	16:13, 16:16, 18:6,	17:25	reports [29] - 3:24,
matter [1] - 4:22	18:24	20:13	propose [1] - 14:5	6:5, 7:16, 8:9, 9:17,
MATTHEW [1] - 1:17	new [3] - 11:4, 17:7	person [1] - 22:8	proposed [3] - 12:3,	9:25, 10:15, 10:18,
mature [1] - 6:8	New [2] - 5:3, 5:19	perspective [2] - 6:20,	13:12, 17:20	11:23, 12:13, 13:7,
measures [1] - 9:4	next [3] - 6:6, 20:8,	13:2	prospect [1] - 4:20	13:9, 13:11, 13:14,
mediation [5] - 19:20,	20:10	Phil [1] - 2:17	prove [1] - 5:14	13:17, 14:1, 14:8,
19:24, 20:6, 20:9,	Notary [3] - 1:14, 22:2,	PHILIP [1] - 1:16	provide [1] - 14:22	15:14, 15:25, 16:5,
20:12	22:15	phone [1] - 12:19	provided [3] - 7:16,	16:9, 16:11, 17:1,
meet [3] - 6:12, 8:4,	note [5] - 7:19, 8:15,	Pierce [1] - 1:10	9:15, 16:18	17:2, 17:24, 19:11,
19:6	14:7, 16:25	place [1] - 16:4	public [1] - 9:8	19:23, 20:9, 20:11
meetings [1] - 6:12	notes [1] - 22:5	plaintiff [1] - 15:23	Public [3] - 1:14, 22:2,	request [2] - 18:19,
mentioned [1] - 13:4	nothing [2] - 4:3, 4:13	Plaintiff [1] - 1:4	22:15	19:1
merits [3] - 8:14, 9:7,	notify [1] - 9:14	Plan [3] - 13:6, 14:21,	put [6] - 4:4, 13:13,	requested [1] - 11:25
9:20	November [1] - 19:19	16:1	13:23, 13:25, 17:24,	resolve [5] - 4:12,
			18:14	5:24, 6:13, 8:3, 8:5
Merrill's [1] - 1:11	number [2] - 11:23,	plays [1] - 14:24		respects [1] - 11:3
Mexico [2] - 5:3, 5:19	13:6	pleased [1] - 5:25	putting [1] - 15:3	respects [1] - 11:3 respond [4] - 9:10,
might [2] - 4:19, 8:11		plunged [1] - 19:11		
millions [1] - 19:14	0	point [6] - 4:21, 6:18,	Q	9:16, 10:17, 16:10
mind [1] - 7:11	object [3] - 12:14,	7:13, 10:20, 13:8,	quickly [2] - 12:22,	responded [1] - 17:16
models [5] - 10:21,	17:21, 18:1	13:13	12:23	responding [1] -
11:1, 11:4, 11:11,		points [2] - 4:4, 9:16		13:18
17:7	obviously [3] - 9:16,	Portland [1] - 1:12	quite [2] - 5:24, 17:16	response [2] - 9:13,
moment [1] - 18:18	16:14, 17:11	position [4] - 4:24,	quote [2] - 19:24,	18:8
moments [1] - 13:4	OF [3] - 1:1, 1:3, 1:6	9:19, 14:3, 17:13	19:25	retained [2] - 8:16,
month [2] - 18:14,	offices [1] - 1:10	pre [1] - 11:1	quoting [1] - 19:23	17:6
19:6	once [2] - 5:11, 19:10	pre-existing [1] - 11:1		review [1] - 14:16
months [5] - 4:21, 6:3,	one [7] - 5:4, 6:12,	prejudice [1] - 15:5	R	rights [1] - 5:21
7:13, 17:3, 19:21	10:6, 10:20, 12:21,	preliminary [1] - 17:11	raise [1] - 4:20	riparian [1] - 5:20
morning [8] - 2:2, 2:4,	13:8, 13:23	premature [1] - 7:14	raised [2] - 7:21,	ripe [1] - 7:25
2:5, 2:6, 2:7, 2:8,	ones [1] - 13:24	prepared [1] - 19:2	10:11	River [1] - 8:24
3:7, 3:10	opinions [1] - 11:10	preparing [1] - 17:3		river [1] - 9:1
most [2] - 5:6, 19:22	opponent's [1] - 4:3	present [1] - 5:15	RALPH [1] - 1:10	RMR [1] - 1:13
	opportunity [4] - 6:4,		rather [3] - 7:10, 14:6,	road [1] - 16:5
motion [2] - 6:15,	6:21, 7:3, 12:15	Present [1] - 1:23	15:2	rule [1] - 18:18
18:23	opposite [1] - 16:8	pretrial [1] - 7:24	raw [1] - 11:5	Tule [1] - 10.10
move [3] - 11:16, 12:7,	Order [1] - 13:6	PRIMIS [13] - 1:19,	read [1] - 8:8	<u> </u>
15:8	order [1] - 10:22	2:5, 2:24, 4:7, 6:19,	really [1] - 7:19	S
moving [1] - 14:12	Orders [1] - 14:22	9:13, 10:1, 10:3,	reasonable [4] - 5:16,	SARAH [1] - 1:21
MR [25] - 2:4, 2:5, 2:6,	ordinarily [1] - 9:6	10:9, 15:19, 20:17,	9:3, 16:18, 16:24	Sarah [1] - 3:13
2:17, 2:24, 3:7, 3:18,	Original [1] - 1:1	20:21, 21:1	rebuttal [1] - 14:20	saw [1] - 6:24
3:25, 4:7, 4:19, 6:19,	_	Primis [7] - 2:25, 4:6,	receive [5] - 11:20,	scheme [1] - 16:21
	outcome rate 00.0			
8:11, 9:13, 10:1,	outcome [1] - 22:8	6:17, 9:12, 10:3,	13:6, 13:9, 15:15,	
10:3, 10:9, 13:1,				scope [1] - 19:7
10:3, 10:9, 13:1, 15:19, 18:8, 20:14,	outcome [1] - 22:8	6:17, 9:12, 10:3,	13:6, 13:9, 15:15, 17:23	scope [1] - 19:7 second [1] - 15:10
10:3, 10:9, 13:1,	P	6:17, 9:12, 10:3, 15:17, 20:16	13:6, 13:9, 15:15, 17:23 received [4] - 10:18,	scope [1] - 19:7 second [1] - 15:10 see [4] - 6:5, 7:11,
10:3, 10:9, 13:1, 15:19, 18:8, 20:14,	Р радеs [3] - 8:12,	6:17, 9:12, 10:3, 15:17, 20:16 procedural [1] - 6:19	13:6, 13:9, 15:15, 17:23 received [4] - 10:18, 10:21, 10:24, 13:7	scope [1] - 19:7 second [1] - 15:10 see [4] - 6:5, 7:11, 18:22, 18:24
10:3, 10:9, 13:1, 15:19, 18:8, 20:14, 20:17, 20:20, 20:21,	P pages [3] - 8:12, 19:15, 22:4	6:17, 9:12, 10:3, 15:17, 20:16 procedural [1] - 6:19 proceedings [2] - 9:8,	13:6, 13:9, 15:15, 17:23 received [4] - 10:18, 10:21, 10:24, 13:7 receiving [1] - 12:13	scope [1] - 19:7 second [1] - 15:10 see [4] - 6:5, 7:11, 18:22, 18:24 series [1] - 9:3
10:3, 10:9, 13:1, 15:19, 18:8, 20:14, 20:17, 20:20, 20:21, 20:25, 21:1	P pages [3] - 8:12, 19:15, 22:4 part [3] - 13:3, 13:19,	6:17, 9:12, 10:3, 15:17, 20:16 procedural [1] - 6:19 proceedings [2] - 9:8, 22:6	13:6, 13:9, 15:15, 17:23 received [4] - 10:18, 10:21, 10:24, 13:7 receiving [1] - 12:13 recent [1] - 5:6	scope [1] - 19:7 second [1] - 15:10 see [4] - 6:5, 7:11, 18:22, 18:24 series [1] - 9:3 set [1] - 10:18
10:3, 10:9, 13:1, 15:19, 18:8, 20:14, 20:17, 20:20, 20:21, 20:25, 21:1 MS [2] - 2:7, 3:13	P pages [3] - 8:12, 19:15, 22:4 part [3] - 13:3, 13:19, 15:6	6:17, 9:12, 10:3, 15:17, 20:16 procedural [1] - 6:19 proceedings [2] - 9:8, 22:6 PROCEEDINGS [1] - 2:1	13:6, 13:9, 15:15, 17:23 received [4] - 10:18, 10:21, 10:24, 13:7 receiving [1] - 12:13 recent [1] - 5:6 recently [1] - 19:5	scope [1] - 19:7 second [1] - 15:10 see [4] - 6:5, 7:11, 18:22, 18:24 series [1] - 9:3 set [1] - 10:18 sets [1] - 11:5
10:3, 10:9, 13:1, 15:19, 18:8, 20:14, 20:17, 20:20, 20:21, 20:25, 21:1 MS [2] - 2:7, 3:13 multiple [1] - 8:17	P pages [3] - 8:12, 19:15, 22:4 part [3] - 13:3, 13:19, 15:6 particular [1] - 14:24	6:17, 9:12, 10:3, 15:17, 20:16 procedural [1] - 6:19 proceedings [2] - 9:8, 22:6 PROCEEDINGS [1] - 2:1 process [3] - 8:6,	13:6, 13:9, 15:15, 17:23 received [4] - 10:18, 10:21, 10:24, 13:7 receiving [1] - 12:13 recent [1] - 5:6 recently [1] - 19:5 recognized [1] - 8:17	scope [1] - 19:7 second [1] - 15:10 see [4] - 6:5, 7:11, 18:22, 18:24 series [1] - 9:3 set [1] - 10:18
10:3, 10:9, 13:1, 15:19, 18:8, 20:14, 20:17, 20:20, 20:21, 20:25, 21:1 MS [2] - 2:7, 3:13	P pages [3] - 8:12, 19:15, 22:4 part [3] - 13:3, 13:19, 15:6 particular [1] - 14:24 parties [1] - 7:4	6:17, 9:12, 10:3, 15:17, 20:16 procedural [1] - 6:19 proceedings [2] - 9:8, 22:6 PROCEEDINGS [1] - 2:1 process [3] - 8:6, 19:19, 19:24	13:6, 13:9, 15:15, 17:23 received [4] - 10:18, 10:21, 10:24, 13:7 receiving [1] - 12:13 recent [1] - 5:6 recently [1] - 19:5 recognized [1] - 8:17 record [2] - 7:8, 7:17	scope [1] - 19:7 second [1] - 15:10 see [4] - 6:5, 7:11, 18:22, 18:24 series [1] - 9:3 set [1] - 10:18 sets [1] - 11:5
10:3, 10:9, 13:1, 15:19, 18:8, 20:14, 20:17, 20:20, 20:21, 20:25, 21:1 MS [2] - 2:7, 3:13 multiple [1] - 8:17	P pages [3] - 8:12, 19:15, 22:4 part [3] - 13:3, 13:19, 15:6 particular [1] - 14:24 parties [1] - 7:4 passed [1] - 13:16	6:17, 9:12, 10:3, 15:17, 20:16 procedural [1] - 6:19 proceedings [2] - 9:8, 22:6 PROCEEDINGS [1] - 2:1 process [3] - 8:6, 19:19, 19:24 produce [3] - 8:23,	13:6, 13:9, 15:15, 17:23 received [4] - 10:18, 10:21, 10:24, 13:7 receiving [1] - 12:13 recent [1] - 5:6 recently [1] - 19:5 recognized [1] - 8:17 record [2] - 7:8, 7:17 reflected [1] - 19:10	scope [1] - 19:7 second [1] - 15:10 see [4] - 6:5, 7:11, 18:22, 18:24 series [1] - 9:3 set [1] - 10:18 sets [1] - 11:5 settlement [1] - 19:18
10:3, 10:9, 13:1, 15:19, 18:8, 20:14, 20:17, 20:20, 20:21, 20:25, 21:1 MS [2] - 2:7, 3:13 multiple [1] - 8:17 N	P pages [3] - 8:12, 19:15, 22:4 part [3] - 13:3, 13:19, 15:6 particular [1] - 14:24 parties [1] - 7:4 passed [1] - 13:16 percent [1] - 20:4	6:17, 9:12, 10:3, 15:17, 20:16 procedural [1] - 6:19 proceedings [2] - 9:8, 22:6 PROCEEDINGS [1] - 2:1 process [3] - 8:6, 19:19, 19:24 produce [3] - 8:23, 17:1, 18:22	13:6, 13:9, 15:15, 17:23 received [4] - 10:18, 10:21, 10:24, 13:7 receiving [1] - 12:13 recent [1] - 5:6 recently [1] - 19:5 recognized [1] - 8:17 record [2] - 7:8, 7:17 reflected [1] - 19:10 regard [1] - 7:9	scope [1] - 19:7 second [1] - 15:10 see [4] - 6:5, 7:11, 18:22, 18:24 series [1] - 9:3 set [1] - 10:18 sets [1] - 11:5 settlement [1] - 19:18 shifting [1] - 5:25
10:3, 10:9, 13:1, 15:19, 18:8, 20:14, 20:17, 20:20, 20:21, 20:25, 21:1 MS [2] - 2:7, 3:13 multiple [1] - 8:17 N named [1] - 22:9	P pages [3] - 8:12, 19:15, 22:4 part [3] - 13:3, 13:19, 15:6 particular [1] - 14:24 parties [1] - 7:4 passed [1] - 13:16 percent [1] - 20:4 perhaps [1] - 19:12	6:17, 9:12, 10:3, 15:17, 20:16 procedural [1] - 6:19 proceedings [2] - 9:8, 22:6 PROCEEDINGS [1] - 2:1 process [3] - 8:6, 19:19, 19:24 produce [3] - 8:23, 17:1, 18:22 produced [1] - 7:16	13:6, 13:9, 15:15, 17:23 received [4] - 10:18, 10:21, 10:24, 13:7 receiving [1] - 12:13 recent [1] - 5:6 recently [1] - 19:5 recognized [1] - 8:17 record [2] - 7:8, 7:17 reflected [1] - 19:10 regard [1] - 7:9 regardless [1] - 16:2	scope [1] - 19:7 second [1] - 15:10 see [4] - 6:5, 7:11, 18:22, 18:24 series [1] - 9:3 set [1] - 10:18 sets [1] - 11:5 settlement [1] - 19:18 shifting [1] - 5:25 shifts [2] - 5:11, 5:14
10:3, 10:9, 13:1, 15:19, 18:8, 20:14, 20:17, 20:20, 20:21, 20:25, 21:1 MS [2] - 2:7, 3:13 multiple [1] - 8:17 N named [1] - 22:9 nationally [1] - 8:17	P pages [3] - 8:12, 19:15, 22:4 part [3] - 13:3, 13:19, 15:6 particular [1] - 14:24 parties [1] - 7:4 passed [1] - 13:16 percent [1] - 20:4 perhaps [1] - 19:12	6:17, 9:12, 10:3, 15:17, 20:16 procedural [1] - 6:19 proceedings [2] - 9:8, 22:6 PROCEEDINGS [1] - 2:1 process [3] - 8:6, 19:19, 19:24 produce [3] - 8:23, 17:1, 18:22 produced [1] - 7:16	13:6, 13:9, 15:15, 17:23 received [4] - 10:18, 10:21, 10:24, 13:7 receiving [1] - 12:13 recent [1] - 5:6 recently [1] - 19:5 recognized [1] - 8:17 record [2] - 7:8, 7:17 reflected [1] - 19:10 regard [1] - 7:9 regardless [1] - 16:2	scope [1] - 19:7 $second [1] - 15:10$ $see [4] - 6:5, 7:11,$ $18:22, 18:24$ $series [1] - 9:3$ $set [1] - 10:18$ $sets [1] - 11:5$ $settlement [1] - 19:18$ $shifting [1] - 5:25$ $shifts [2] - 5:11, 5:14$ $show [2] - 20:9, 20:12$ $showing [2] - 5:12,$
10:3, 10:9, 13:1, 15:19, 18:8, 20:14, 20:17, 20:20, 20:21, 20:25, 21:1 MS [2] - 2:7, 3:13 multiple [1] - 8:17 N named [1] - 22:9 nationally [1] - 8:17 nationally-	P pages [3] - 8:12, 19:15, 22:4 part [3] - 13:3, 13:19, 15:6 particular [1] - 14:24 parties [1] - 7:4 passed [1] - 13:16 percent [1] - 20:4 perhaps [1] - 19:12 PERRY [11] - 1:16, TH]	6:17, 9:12, 10:3, 15:17, 20:16 procedural [1] - 6:19 proceedings [2] - 9:8, 22:6 PROCEEDINGS [1] - 2:1 process [3] - 8:6, 19:19, 19:24 produce [3] - 8:23, 17:1, 18:22 produced [1] - 7:16	13:6, 13:9, 15:15, 17:23 received [4] - 10:18, 10:21, 10:24, 13:7 receiving [1] - 12:13 recent [1] - 5:6 recently [1] - 19:5 recognized [1] - 8:17 record [2] - 7:8, 7:17 reflected [1] - 19:10 regard [1] - 7:9 regardless [1] - 16:2 ROUP ant [1] - 19:4	scope [1] - 19:7 second [1] - 15:10 see [4] - 6:5, 7:11, 18:22, 18:24 series [1] - 9:3 set [1] - 10:18 sets [1] - 11:5 settlement [1] - 19:18 shifting [1] - 5:25 shifts [2] - 5:11, 5:14 show [2] - 20:9, 20:12

sides [3] - 11:1, 12:15,	т	w
sides [3] - 11:1, 12:15, 19:11 significant [4] - 10:15, 11:8, 12:1, 16:23 simply [1] - 10:25 Solicitor [3] - 2:19, 3:1, 3:14 somewhat [1] - 5:18 SPECIAL [23] - 1:9, 2:2, 2:8, 2:21, 3:5, 3:10, 3:16, 3:20, 4:5, 4:8, 6:10, 8:1, 9:11, 9:22, 10:2, 10:8, 12:24, 15:16, 18:6, 18:10, 20:15, 20:18, 20:22 Special [4] - 11:13, 11:15, 16:6, 16:14 spinning [1] - 20:6 stake [1] - 16:22 starting [1] - 10:23 state [1] - 5:11 STATE [2] - 1:3, 1:6 State [7] - 1:14, 1:16, 1:19, 2:25, 3:18, 11:8, 22:3 statements [1] - 5:6 States [1] - 3:6 STATES [1] - 1:1 states [4] - 5:20, 5:21, 5:22, 9:4 status [3] - 5:2, 6:25, 10:12 stenographic [1] - 22:5 streamlining [1] - 16:7 Street [1] - 1:11 subscribe [1] - 22:10 subsequent [1] - 14:13 substantial [3] - 8:23, 10:13, 15:5 substantially [1] - 8:25 substantive [1] - 10:16 suggest [2] - 18:21, 20:2	technical [1] - 12:17 telephone [2] - 1:9, 21:2 tentatively [2] - 15:7, 15:12 terms [2] - 7:17, 11:13 THE [1] - 1:1 thereafter [1] - 14:15 thinking [2] - 15:6, 17:12 thinks [1] - 16:16 thoroughly [3] - 8:8, 18:23, 18:24 thousands [1] - 19:13 tied [1] - 13:3 time-consuming [1] - 17:8 timely [1] - 15:25 today [2] - 18:12, 19:3 together [2] - 18:15, 18:22 took [1] - 14:8 towards [1] - 4:2 transcript [1] - 22:5 try [1] - 13:13 two [2] - 3:3, 5:4 types [3] - 7:5, 9:4, 11:24 typically [1] - 7:6 U U.S [2] - 5:9, 11:7 U.S.A [1] - 1:22 ultimately [2] - 7:22, 19:14 uncertainty [1] - 13:19 under [4] - 5:13, 13:5, 14:14, 16:1 underscore [2] - 10:20, 11:25 unkindly [1] - 20:3 unquote [2] - 19:25,	W wants [1] - 12:7 warranted [1] - 17:18 WARREN [2] - 1:21, 3:13 Warren [1] - 3:13 ways [1] - 11:6 wayside [1] - 19:14 week [2] - 10:22, 17:14 weeks [1] - 7:13 weighed [1] - 7:9 welcome [1] - 6:3 Wharf [1] - 1:11 wheels [1] - 20:7 WHEREOF [1] - 22:10 Williams [1] - 2:20 WILLIAMS [1] - 1:17 Winsor [1] - 2:10 Winsor [1] - 2:19 WINSOR [2] - 1:16, 2:6 wish [1] - 12:25 WITNESS [1] - 22:10 wonderful [1] - 2:13 Y years [1] - 17:5 yourselves [1] - 8:5
10:16 suggest [2] - 18:21, 20:2 suggested [2] - 19:6, 19:20	United [1] - 3:5 unkindly [1] - 20:3	
suggests [1] - 8:19 summary [2] - 7:7, 7:24 support [2] - 6:15, 18:25	upstream [2] - 5:14, 8:20 V	
SUPREME [1] - 1:1 Supreme [2] - 5:7, 5:10 surveys [1] - 17:8 swing [1] - 10:4	valuable [1] - 2:11 versus [2] - 5:3, 5:19 view [2] - 11:25, 12:20 THI	E REPORTING GROU Mason & Lockhart

. ugu 20 to 20 0, 20