

No. 142, Original

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

**STATE OF FLORIDA'S OBJECTIONS TO THE WRITTEN DIRECT TESTIMONY OF
ROBERT STAVINS, PH.D.**

PAMELA JO BONDI
ATTORNEY GENERAL, STATE OF FLORIDA

JONATHAN L. WILLIAMS
DEPUTY SOLICITOR GENERAL
JONATHAN GLOGAU
SPECIAL COUNSEL
OFFICE OF THE ATTORNEY GENERAL

FREDERICK L. ASCHAUER, JR.
GENERAL COUNSEL
FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION

GREGORY G. GARRE
Counsel of Record
PHILIP J. PERRY
CLAUDIA M. O'BRIEN
ABID R. QURESHI
JAMIE L. WINE
LATHAM & WATKINS LLP
555 11th Street, NW
Suite 1000
Washington, DC 20004
Tel.: (202) 637-2207
gregory.garre@lw.com

PAUL N. SINGARELLA
LATHAM & WATKINS LLP

CHRISTOPHER M. KISE
JAMES A. MCKEE
ADAM C. LOSEY
FOLEY & LARDNER LLP

MATTHEW Z. LEOPOLD
CARLTON FIELDS JORDEN BURT P.A.

ATTORNEYS FOR THE STATE OF FLORIDA

Pursuant to Case Management Order 20, the State of Florida hereby serves objections to the admission of the following portions of the Direct Testimony of Dr. Robert Stavins.

Testimony	Basis of Objection
¶ 4	Foundation; Speculation
¶ 11 – <i>Last Sentence</i>	Foundation
¶ 14	Foundation; Hearsay
¶ 15 & Demo. 1	Foundation; Hearsay
¶ 16	Foundation; Hearsay
¶ 17 & Demo. 2	Foundation; Hearsay
¶ 18 & Demo. 3	Foundation; Hearsay
¶ 19	Foundation
¶ 21	Mischaracterizes Testimony; Foundation
¶ 22 – <i>First Sentence</i>	Foundation
¶ 24 – <i>First Two Sentences, Fourth Sentence</i>	Foundation; Speculation
¶ 25	Mischaracterizes Testimony
¶ 25 – <i>Last Sentence</i>	Speculation
¶ 26	Speculation
¶¶ 32-33, 34 & Demo. 8	Mischaracterizes Documents and Data; Foundation
¶ 40 – <i>Last Sentence</i>	Mischaracterizes Testimony
¶ 43 – <i>First Sentence</i>	Mischaracterizes Testimony
¶ 44	Mischaracterizes Testimony
¶ 45	Mischaracterizes Testimony; Speculation
¶ 46	Foundation

¶ 47	Mischaracterizes Testimony
¶ 48	Mischaracterizes Testimony; Speculation
¶ 49	Foundation; Speculation
¶ 50	Foundation; Speculation
¶ 51 – <i>Seventh through Eleventh Sentences</i>	Foundation; Speculation
¶ 53	Mischaracterizes Testimony
¶ 54 – <i>Last Sentence</i>	Foundation
¶ 55	Foundation
¶ 56	Foundation
¶ 58	Foundation; Hearsay
¶ 59 <i>First Sentence</i>	Foundation; Hearsay
¶ 61 <i>Third Sentence</i>	Mischaracterizes Testimony
¶ 63	Foundation
¶ 64	New Expert Opinion
¶ 67 <i>Second Sentence</i>	Mischaracterizes Testimony
¶ 69	Foundation; Hearsay
¶ 70	New Expert Opinion
¶ 71	Foundation; Hearsay
¶ 73	Mischaracterizes Testimony; Hearsay
¶ 75	Hearsay; New Expert Opinion
¶ 76	Foundation; Hearsay
¶ 82	New Expert Opinion
¶ 84	Foundation
¶ 85	Foundation; New Expert Opinion

November 16, 2016

¶ 86	Foundation; Hearsay
¶ 87	Foundation
¶ 88	Foundation; Hearsay
¶ 89	Foundation; Mischaracterizes Testimony
¶ 90	Foundation
¶ 91	Foundation
¶ 93	Foundation
¶ 94	Foundation; Speculation
¶ 95	Foundation; Speculation
¶ 96	Foundation; Hearsay
¶ 97	Mischaracterizes Testimony
¶ 101	Foundation
¶ 103	Mischaracterizes Testimony
¶ 104	Foundation; Speculation
¶ 106	Foundation; New Expert Opinion
¶ 110	Foundation; New Expert Opinion
¶ 114	Foundation; Hearsay
¶ 115	Hearsay
¶ 116	Hearsay
¶ 119	Hearsay
¶ 120	Hearsay
¶ 121	Hearsay
¶ 122	Hearsay
¶ 123	Foundation; Hearsay; Mischaracterizes Testimony

November 16, 2016

¶ 124	Hearsay
¶ 125	Hearsay; Mischaracterizes Testimony
¶ 126	Testimony; New Expert Opinion
¶ 127	New Expert Opinion
¶ 128	Hearsay
¶ 132	Foundation
¶ 133	Foundation; Mischaracterizes Testimony
¶ 134	Foundation; Hearsay; New Expert Opinion
¶ 138	Foundation

November 16, 2016