

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
DR. CHARLES A. MENZIE**

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November 29, 2016

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. Charles A. Menzie.

Portion of Testimony	Basis of Objection
¶ 6b, Second Bullet	Foundation
¶ 7a, First Bullet – <i>Second Sentence</i>	Foundation
¶ 8, Second Bullet – <i>Last Sentence</i>	Foundation
¶ 22 – <i>Last Sentence & Demo. 2</i>	Foundation
¶ 23 – <i>Last Two Sentences</i>	Foundation
¶ 24 – <i>First Two Sentences</i>	Foundation
¶ 27	Foundation
¶ 28 & Demo. 5	Foundation; Speculation
¶ 31	Foundation
¶ 40	Mischaracterizes Testimony
¶ 41 – <i>Second to Last Sentence</i>	Mischaracterizes Testimony
¶ 66	Relevance
¶ 77	Foundation
¶ 78	Foundation
¶ 101 – <i>Third Sentence</i>	Mischaracterizes Testimony
¶ 116	Foundation
¶ 127	Relevance
¶¶ 134-135 & Demo. 30	Relevance
¶ 158	Mischaracterizes Documents; Foundation
¶ 165 – <i>Last Sentence</i>	Mischaracterizes Documents; Foundation

¶¶ 171-72 & Demo. 41 and 42	Foundation; Speculation; Failure to Timely Disclose Opinion
¶ 177 & Demo. 44	Failure to Timely Disclose Opinion
¶¶ 181-82; Demo. 46	Foundation
¶ 185; Demo. 50	Foundation; Speculation; Failure to Timely Disclose Opinion
¶ 207	Foundation; Hearsay; Speculation
¶ 216 – <i>Second Sentence</i>	Foundation; Hearsay; Speculation
¶¶ 222-223	Foundation; Speculation
¶¶ 231-232	Outside Scope of Expert Testimony; Foundation; Speculation