

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
PETER MAYER, P.E.**

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November 19, 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 Peter Mayer, P.E.

Testimony	Basis of Objection
¶ 4	Mischaracterizes Document
¶ 7	Mischaracterizes Document
¶ 8	Hearsay
¶ 9	Hearsay; Foundation
¶ 10	Foundation
¶ 20	Hearsay
¶ 21	Hearsay
¶ 24	Hearsay
¶ 25	Hearsay; Foundation
¶ 28	Outside Scope of Expert Testimony
¶ 29	Mischaracterizes Document
¶ 31	Foundation
¶ 34	Hearsay; Foundation
¶ 35	Foundation
¶ 37 – <i>Third Sentence</i>	Hearsay; Foundation
¶ 40	Foundation
¶ 42 – <i>Third Sentence</i>	Foundation
¶ 45	Foundation
¶ 49	Hearsay; Mischaracterizes Prior Testimony
¶ 51 – <i>Third Sentence</i>	Calls for Speculation; Foundation

¶ 56	Hearsay
¶ 57	Hearsay; Foundation
¶ 60	Hearsay; Foundation
¶ 61	Hearsay
¶ 63	Hearsay
¶ 64	Hearsay, Foundation
¶ 66	Foundation; Speculation
¶ 67	Foundation
¶ 70	Foundation
¶ 75 – <i>Third and Fourth Sentences</i>	Hearsay
¶ 78	Speculation; Foundation
¶ 83	Hearsay; Relevance
¶ 85	Hearsay; Relevance
¶ 88	Foundation; New Expert Opinion
¶ 89	Mischaracterizes Prior Testimony; Hearsay
¶ 90	Mischaracterizes Prior Testimony
¶ 91	Mischaracterizes Prior Testimony; Hearsay; Foundation
¶ 93	Hearsay; Mischaracterizes Prior Testimony
¶ 95	Foundation
¶ 96	Foundation
¶ 97	Relevance; Foundation
¶¶ 99-100	Mischaracterizes Prior Testimony and Document

¶ 101	Mischaracterizes Prior Testimony
¶ 102	Relevance
¶ 103	Foundation
¶ 104	Foundation; Outside Scope; Speculation
¶ 107	Foundation
¶ 109 – <i>Last Sentence</i>	Hearsay
¶ 116	Speculation
¶ 120	Foundation; New Expert Opinion
¶ 122	Foundation; New Expert Opinion
¶ 123	Foundation
¶ 124	Foundation
¶ 125	Foundation
¶ 126	Outside Scope; New Expert Opinion; Foundation
¶ 127	Outside Scope; New Expert Opinion; Foundation
¶ 128	Outside Scope; New Expert Opinion; Foundation
¶ 129	Outside Scope; New Expert Opinion; Foundation
¶ 130	Outside Scope; Hearsay; Foundation
¶ 131	Outside Scope; New Expert Opinion; Foundation
¶ 132	Outside Scope; New Expert Opinion; Foundation
¶ 134	Mischaracterizes Document
¶¶ 135-137	Foundation