

No. 142, Original

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In the  
Supreme Court of the United States

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STATE OF FLORIDA,

*Plaintiff,*

v.

STATE OF GEORGIA,

*Defendant.*

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Before the Special Master  
Hon. Ralph I. Lancaster

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**STATE OF FLORIDA'S OBJECTIONS TO THE WRITTEN DIRECT TESTIMONY OF  
ROMAULD N. LIPCIUS, PH.D.**

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November 30, 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. Romuald Lipcius.

Testimony	Basis of Objection
¶ 4 – <i>Footnote 1</i>	Mischaracterizes Testimony
¶ 11 – <i>Subparagraph (d)</i>	Hearsay
¶ 26	Foundation; Speculation
¶ 35 – <i>First Sentence</i>	Mischaracterizes Documents
¶ 35 – <i>Last Two Sentences</i>	Foundation; Speculation
¶¶ 40-45; Demos. 2-4	Foundation; Speculation
¶ 46 – <i>Second and Third Sentences</i>	Mischaracterizes Testimony
¶ 47	Mischaracterizes Testimony
¶¶ 48-51; Demo. 5	Foundation; Speculation
¶ 57	Hearsay
¶ 59	Hearsay
¶ 60	Hearsay
¶ 61	Hearsay
¶ 64	Foundation; Speculation
¶ 65	Mischaracterizes Documents
¶ 71 – <i>First Sentence</i>	Foundation; Mischaracterizes Documents
¶¶ 72-73	Foundation; Mischaracterizes Documents
¶ 75	Foundation; Mischaracterizes Documents
¶ 76 – <i>Fourth Sentence; Demo. 7</i>	Mischaracterizes Document
¶¶ 77-79	Mischaracterizes Document

¶ 80	Hearsay; Mischaracterizes Document
¶ 81	Hearsay
¶ 82	Hearsay; Speculation
¶ 84	Foundation
¶ 85 – <i>Second Sentence</i>	Mischaracterizes Testimony
¶ 86	Hearsay; Foundation
¶ 87 – <i>First and Fourth Sentences</i>	Mischaracterizes Testimony
¶ 88	Foundation; Mischaracterizes Testimony
¶ 90	Foundation; Mischaracterizes Testimony
¶ 91 – <i>Second Sentence</i>	Mischaracterizes Testimony
¶ 92	Mischaracterizes Testimony
¶ 93	Foundation; Mischaracterizes Testimony
¶ 94	Foundation
¶¶ 95-96	Foundation; Mischaracterizes Testimony
¶¶ 97-98	Foundation; Speculation
¶ 102	Foundation; Speculation; Mischaracterizes Documents
¶ 104	Foundation; Speculation
¶ 109	Hearsay; Foundation; Speculation
¶ 110	Foundation; Mischaracterizes Documents
¶ 115	Mischaracterizes Documents
¶ 117	Mischaracterizes Documents
¶ 118	Foundation

¶ 121	Hearsay; Mischaracterizes Document
¶ 123	Foundation
¶ 124 – <i>First Sentence</i>	Foundation
¶ 125 – <i>Last Two Sentences</i>	Hearsay; Foundation
¶ 126	Hearsay
¶ 127	Hearsay; Mischaracterizes Document
¶ 128 – <i>First and Second Sentences</i>	Mischaracterizes Document
¶ 133 – <i>Fourth Sentence</i>	Foundation; Speculation
¶ 136	Foundation; Mischaracterizes Documents
¶ 137-138; Demo. 15	Mischaracterizes Documents; Foundation; Speculation
¶ 139 – <i>Last Three Sentences</i>	Mischaracterizes Document
¶ 140	Mischaracterizes Document
¶ 143	Mischaracterizes Testimony and Document; Speculation
¶ 147	Foundation; Speculation
¶ 148 – <i>Fourth Sentence</i>	Mischaracterizes Testimony
¶ 151	Foundation
¶¶ 154-156	Mischaracterizes Testimony
¶¶ 159-161; Demo. 17	Failure to timely disclose opinion
¶ 162	Failure to timely disclose opinion; Foundation
¶ 163	Hearsay
¶ 164	Hearsay; Mischaracterizes Documents; Speculation

¶ 167 – <i>First Sentence, Second Sentence</i>	Hearsay
¶ 168	Hearsay; Mischaracterizes Documents; Speculation
¶ 170	Hearsay
¶ 172 – <i>First Sentence</i>	Speculation
¶ 173	Hearsay; Speculation
¶ 174	Mischaracterizes Document; Hearsay
¶ 175	Hearsay; Foundation; Mischaracterizes Document
¶¶ 178-179	Foundation; Mischaracterizes Documents
¶ 180	Foundation; Speculation
¶ 181 – <i>Last Sentence</i>	Speculation
¶ 182 – <i>First Sentence</i>	Foundation; Speculation
¶ 183	Hearsay
¶ 184	Hearsay; Speculation
¶ 185	Foundation; Speculation