

No. 141, Original

IN THE  
SUPREME COURT OF THE UNITED STATES

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STATE OF TEXAS,

*Plaintiff,*

v.

STATE OF NEW MEXICO and  
STATE OF COLORADO,

*Defendants.*

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**OFFICE OF THE SPECIAL MASTER**

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**STATE OF NEW MEXICO'S NOTICE OF EXHIBIT  
DISCLOSURES AND OBJECTIONS FOR  
SHAYNE FRANZOY**

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October 20, 2021

In response to the Special Master's September 16, 2021 Order Regarding Remote Trial Protocols, the State of New Mexico provides the following exhibit disclosures and objections for Shayne Franzoy. As of this filing, the parties anticipate that Mr. Franzoy will testify on October 21, 2021. Accordingly, the State of New Mexico provides the following:

**Attachment 1:** The Shayne Franzoy direct-examination exhibit index, which identifies the States of Texas's and Colorado's and the United States of America's objections.

**Attachment 2:** The Shayne Franzoy cross-examination exhibit index, which identifies the States of New Mexico's and Colorado's objections.

All exhibits, indexes, and related exhibits have been uploaded to Box.com and are available for the parties to access and download. In an effort to resolve these objections, the parties have met and conferred in good faith.

Dated: October 20, 2021

Respectfully submitted,

By: /s/ Jeffrey J. Wechsler  
Jeffrey J. Wechsler

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STATE OF TEXAS,

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◆  
\_\_\_\_\_  
**OFFICE OF THE SPECIAL MASTER**

**STATE OF NEW MEXICO'S CERTIFICATE OF SERVICE**

\_\_\_\_\_  
◆  
\_\_\_\_\_

This is to certify that on this 20th day of October, 2021, I caused a true and correct copy of **THE STATE OF NEW MEXICO'S NOTICE OF EXHIBIT DISCLOSURES AND OBJECTIONS FOR SHAYNE FRANZOY** to be served upon all parties and *amici curiae*, by and through the attorneys of record and/or designated representatives for each party and *amicus curiae* in this original action. As permitted by order of the Special Master, and agreement among the parties, service was effected by electronic mail to those individuals listed on the attached service list, which reflects all updates and revisions through the current date.

Respectfully submitted,

Dated: October 20, 2021

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TX and US Objections to NM Direct Examination Exhibits for Shayne Franzoy

<b>Trial Exhibit</b>	<b>Trial Exno</b>	<b>Prod Beg</b>	<b>Prod End</b>	<b>Date</b>	<b>Subject/Title</b>	<b>Category (A, B, C)</b>	<b>Category B Objections (Cite Fed. R. Evid.)</b>	<b>Category C Objections (Cite Fed. R. Evid.)</b>
NM	NM-0673	NM_00286580	NM_00286580	12/18/2019	Letter Re: Notice of Non-Compliance	A		
NM	NM-0791	NM_00444772	NM_00444772	7/8/2013	Notice of Groundwater Accounting for 2012	A		
NM	NM-DEMO-001	NM-DEMO-001	NM-DEMO-001		Google Earth Demonstrative	ADMITTED FOR DEMONSTRATIVE PURPOSES ONLY		
NM	NM-DEMO-008	NM-DEMO-008	NM-DEMO-008	8/12/2021	New Well Test - Biad Middle	A		
NM	NM-DEMO-023	NM-DEMO-023	NM-DEMO-023		Chile River Crop Plantings Sheet	A		
NM	NM-DEMO-024	NM-DEMO-024	NM-DEMO-024		Southern Rio Grande Diversified Crop	A		

New Mexico Objections to TX/US Cross Examination Exhibits for Shayne Franzoy

TrialExhibit	Triaexno	ProdBeg	ProdEnd	Date	Subject/Title	Category A	CategoryBObjections	CategoryCObjections
NM	NM-0791	NM_00444772	NM_00444772	7/8/2013	Notice of Groundwater Accounting for 2012	A		
TX	TX-0155	TX_DEPO-EX_00041645	TX_DEPO-EX_00041646	12/10/2018	Frazoy, Jerry Exhibit from Deposition Testimony, Vol. 1FRANZOY EXHIBIT 21: Web Printout New Mexico Office of the State Engineer Water Right Summary for LRG 15649, retrieved 12/10/2018	ADMITTED		