

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  
SCOTT ESCHENBRENNER**

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November 2, 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 Scott Eschenbrenner. As of this filing, the parties anticipate that Mr. Eschenbrenner will testify on November 3 or 4, 2021. Accordingly, the State of New Mexico provides the following:

**Attachment 1:** The Scott Eschenbrenner direct-examination exhibit index, which identifies the States of Texas's and the United States of America's objections. Please note that there is no attachment containing a cross-examination index because there are no cross-examination exhibits.

All exhibits, indexes, and related exhibits have been uploaded to Box.com and are available for the parties to access and download.

Dated: November 2, 2021

Respectfully submitted,

By: /s/ Jeffrey J. Wechsler  
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◆  
\_\_\_\_\_  
**OFFICE OF THE SPECIAL MASTER**

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

This is to certify that on this 2nd day of November, 2021, I caused a true and correct copy of **THE STATE OF NEW MEXICO'S NOTICE OF EXHIBIT DISCLOSURES AND OBJECTIONS FOR SCOTT ESCHENBRENNER** 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: November 2, 2021

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NM	NM-0847	NM_00471126	NM_00471264	6/1/2003	NMSU Water Plan 2002-2042	B	TX & US Object - Hearsay (Fed. R. Evid. 802); Relevance (Fed. R. Evid. 401, 403); Improper expert testimony by lay witness (Fed. R. Evid. 701, 702)	
NM	NM-0853	NM_00471362	NM_00471378	11/9/2007	Subfile Order - LRG-00035 :D-307-CV-96-888	B	TX & US Object - Relevance (Fed. R. Evid. 401, 403)	
NM	NM-0854	NM_00471379	NM_00471398		ACES Strategic Plan 2020-2025	B	TX & US Object - Relevance (Fed. R. Evid. 401, 403)	
NM	NM-0857	NM_00471485	NM_00471582	9/1/2018	The Economy and Functional Impact	B, C	TX & US Object - Relevance (Fed. R. Evid. 401, 403); Hearsay (Fed. R. Evid. 802)	TX & US Object - Foundation (Fed. R. Evid. 602)
NM	NM-1027	NM_00475003	NM_00475143	7/1/1988	A History of New Mexico State University's Well Development and Group Water Use	B,C	TX & US Object - Hearsay (Fed. R. Evid. 802); Relevance (Fed. R. Evid. 401, 403); Improper expert testimony by lay witness (Fed. R. Evid. 701, 702)	TX & US Object - Foundation (Fed. R. Evid. 602)