

No. 141, Original

IN THE
SUPREME COURT OF THE UNITED STATES

STATE OF TEXAS,

Plaintiff,

v.

STATE OF NEW MEXICO and
STATE OF COLORADO,

Defendants.

OFFICE OF THE SPECIAL MASTER

**STATE OF NEW MEXICO'S NOTICE OF EXHIBIT
DISCLOSURES AND OBJECTIONS FOR
DANIEL CHAVEZ**

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

Attachment 1: The Daniel Chavez direct-examination exhibit index, which identifies the States of Texas's and the United States of America's objections.

Attachment 2: The Daniel Chavez cross-examination exhibit index, which identifies the State of New Mexico's objections. Note that there are no objections to these 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 3, 2021

Respectfully submitted,

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

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STATE OF NEW MEXICO'S CERTIFICATE OF SERVICE

This is to certify that on this 3rd 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 DANIEL CHAVEZ** 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 3, 2021

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HONORABLE MICHAEL J. MELLOY

Special Master

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Trial Exhibit	TrialExno	ProdBeg	ProdEnd	Date	Subject/Title	Category B, C)	(A, Category B Objections (Cite Fed. R. Evid.)	Category C Objections (Cite Fed. R. Evid.)	Notes
JT	JT-0449	Reyes2-DepoEX0019_00001	Reyes2-DepoEX0019_00007	2/19/2010	Agreement for the Sale of Sewage Effluent for Irrigation between Hudspeth County Conservation and Reclamation District No. 1 and the El Paso County Water Improvement District No. 1	See Note			Admitted
NM	NM-0030	Chavez-DepoEX0006_00001	Chavez-DepoEX0006_00003	5/9/2011	Bill for Collection	A			
NM	NM-0032	Chavez-DepoEX0008_00001	Chavez-DepoEX0008_00005	11/14/2001	Agreement for the Sale of Sewage Effluent for Irrigation between Hudspeth County Conservation and Reclamation District No. 1 and EPCWID dated 10/17/01	A			
NM	NM-0033	Chavez-DepoEX0010_00001	Chavez-DepoEX0010_00008	5/21/2002	Charges and Amount Delivered from Effluent Contract	A			
NM	NM-0034	Chavez-DepoEX0011_00001	Chavez-DepoEX0011_00007	1/15/1997	Interlocal Agreement for Water Supply between Hudspeth County Conservation and Reclamation District No. 1 and EPCWID dated 1/15/97	C		TX & US Object - Foundation (Fed. R. Evid. 602)	
NM	NM-0197	EPCWID_063862	EPCWID_063867	1/28/1998	Interlocal Agreement for Water Supply between HCCRD and EPCWID	C		TX & US Object - Foundation (Fed. R. Evid. 602)	
NM	NM-0205	EPCWID_182467	EPCWID_182473	1/13/1999	INTERLOCAL AGREEMENT FOR WATER SUPPLY between Hudspeth County Conservation and Reclamation District No. 1 and El Paso County Water Improvement District No. 1	C		TX & US Object - Foundation (Fed. R. Evid. 602)	
NM	NM-DEMO-031	NM-DEMO-001	NM-DEMO-001		Google Earth	See Note			Admitted
US	US-0436	US0776530	US0776544	4/27/1951	CONTRACT - Amendatory Contract for Rental of Water by Hudspeth plus other documents	See Note			Admitted

Trial Exhibit	Trialxno	ProdBeg	ProdEnd	Date	Subject/Title	Category B, C)	(A, Category B Objections (Cite Fed. R. Evid.)	Category C Objections (Cite Fed. R. Evid.)	Notes
TX	NM-0031	Chavez-DepoEX0006_00001	Chavez-DepoEX0006_00003	5/24/2013	Bill for Collection	A			
TX	TX-1200	LANDRY_00000223	LANDRY_00000223		Drone Video and Photographs: ElephantButte Ft.Quitman_DroneFootageDemonstrative	A; see note.			Despite the exhibit number, New Mexico understands Texas intends to offer this as a demonstrative exhibit. New Mexico has no objection so long as it is used for demonstrative purposes only.