

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
DR. WEI ZENG**

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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 Dr. Wei Zeng.

Testimony	Basis of Objection
¶ 5 (last five sentences)	Foundation; Improper Opinion Testimony
¶ 6 (last two sentences)	Foundation; Improper Opinion Testimony
¶ 7 (last three sentences)	Hearsay
¶ 8 (last three sentences)	Foundation; Improper Opinion Testimony
¶ 17	Foundation; Improper Opinion Testimony
¶ 19	Foundation; Improper Opinion Testimony
Zeng Demonstrative 1	Foundation; Improper Opinion Testimony
¶¶ 20-22	Foundation; Improper Opinion Testimony
Zeng Demonstrative 2	Foundation; Improper Opinion Testimony
Zeng Demonstrative 3	Foundation; Improper Opinion Testimony
¶ 23 (first sentence)	Foundation; Improper Opinion Testimony
¶ 25	Foundation; Improper Opinion Testimony
¶ 26	Foundation; Improper Opinion Testimony
¶ 27 (last sentence)	Foundation; Improper Opinion Testimony
¶¶ 28-33	Foundation; Improper Opinion Testimony
Zeng Demonstrative 4	Foundation; Improper Opinion Testimony
Zeng Demonstrative 5	Foundation; Improper Opinion Testimony
¶ 34 (last six sentences)	Foundation; Improper Opinion Testimony
¶ 35 (last sentence)	Foundation; Improper Opinion Testimony
¶ 36 (second to last sentence)	Foundation
¶¶ 37-40	Foundation; Improper Opinion Testimony
¶ 41 (last three sentences)	Foundation; Improper Opinion Testimony

¶ 42	Foundation; Improper Opinion Testimony
Zeng Demonstrative 6	Foundation; Improper Opinion Testimony
¶ 43 (first sentence)	Foundation; Improper Opinion Testimony
¶ 43 (last sentence)	Mischaracterizes document; Improper Opinion Testimony; Foundation
¶¶ 44-48	Foundation; Improper Opinion Testimony
¶ 50 (last sentence)	Foundation; Improper Opinion Testimony
¶¶ 51-52	Foundation; Improper Opinion Testimony
Zeng Demonstrative 7	Foundation; Improper Opinion Testimony
¶ 53 (last five sentences)	Foundation; Improper Opinion Testimony
Zeng Demonstrative 8	Foundation; Improper Opinion Testimony
¶¶ 54-55	Foundation; Improper Opinion Testimony
¶ 56 (last four sentences)	Foundation; Improper Opinion Testimony
¶¶ 57-70	Foundation; Improper Opinion Testimony
Zeng Demonstrative 9	Foundation; Improper Opinion Testimony
Zeng Demonstrative 10	Foundation; Improper Opinion Testimony
Zeng Demonstrative 11	Foundation; Improper Opinion Testimony
Zeng Demonstrative 12	Foundation; Improper Opinion Testimony
¶ 72	Foundation; Improper Opinion Testimony
¶ 73 (second sentence)	Foundation; Improper Opinion Testimony
¶¶ 74-75	Foundation; Improper Opinion Testimony
¶¶ 78-88	Foundation; Improper Opinion Testimony
¶¶ 90-108	Foundation; Improper Opinion Testimony; Speculation
Zeng Demonstrative 15	Foundation; Improper Opinion Testimony; Speculation

Zeng Demonstrative 17	Foundation; Improper Opinion Testimony; Speculation
¶ 109 (last two sentences)	Foundation; Improper Opinion Testimony; Speculation
¶¶ 110-112	Foundation; Improper Opinion Testimony; Speculation
Zeng Demonstrative 18	Foundation; Improper Opinion Testimony
¶ 113	Foundation; Improper Opinion Testimony; Speculation; Hearsay
¶¶ 114-116	Foundation; Improper Opinion Testimony
¶¶ 118-119	Foundation; Improper Opinion Testimony
¶ 120 (first sentence)	Foundation; Improper Opinion Testimony
¶¶ 121-123	Foundation; Improper Opinion Testimony; Speculation
Zeng Demonstrative 19	Foundation; Improper Opinion Testimony; Speculation
¶¶ 124-126	Foundation; Improper Opinion Testimony
¶ 127	Foundation; Improper Opinion Testimony; Speculation
¶ 128 (first four sentences)	Foundation; Improper Opinion Testimony
¶ 129	Foundation; Improper Opinion Testimony
¶ 130	Foundation
¶ 131 (second sentence)	Foundation; Improper Opinion Testimony
¶ 132	Hearsay
¶¶ 133-135	Foundation; Improper Opinion Testimony
¶ 137 (last four sentences)	Hearsay
¶ 138	Hearsay

¶ 138 (second, third, and fourth sentences)	Improper Opinion Testimony; Foundation; Speculation
¶ 138 (fifth sentence)	Speculation
¶ 139 (first two sentences)	Hearsay
¶ 139 (last two sentences)	Hearsay; Speculation; Improper Opinion Testimony; Foundation
¶¶ 141-158	Foundation; Improper Opinion Testimony
¶ 144 (second sentence)	Hearsay
¶ 149 (second sentence)	Hearsay
Zeng Demonstrative 20	Foundation; Improper Opinion Testimony
Zeng Demonstrative 21	Foundation; Improper Opinion Testimony
Zeng Demonstrative 22	Foundation; Improper Opinion Testimony