No. 142, Original

In The Supreme Court of the United States

## STATE OF FLORIDA,

Plaintiff,

v.

STATE OF GEORGIA,

Defendant.

## GEORGIA'S OBJECTIONS TO WRITTEN DIRECT TESTIMONY OF DR. MARCIA GREENBLATT

SAMUEL S. OLENS ATTORNEY GENERAL STATE OF GEORGIA DEPARTMENT OF LAW 40 Capitol Square Atlanta, GA 30334 Tel.: (404) 656-3383 AGOlens@law.ga.gov CRAIG S. PRIMIS, P.C. Counsel of Record K. WINN ALLEN DEVORA W. ALLON KIRKLAND & ELLIS LLP 655 15th Street, NW Washington, DC 20005 Tel.: (202) 879-5000 craig.primis@kirkland.com

October 29, 2016

Pursuant to Case Management Order 20, the State of Georgia hereby serves

objections to the admission of the following portions of the Direct Testimony of Dr.

Marcia Greenblatt.

Portion of Testimony	Basis of Objection
¶ 3 "Salinity is a key variable in the Bay for the survival of oysters, as explained in the testimony of Dr. Kimbro."	Foundation
¶ 3 "It also affects other important species such as phytoplankton and submersed aquatic vegetation, as explained in the testimony of Dr. Glibert."	Foundation
¶ 4 "As my work shows, Georgia's water consumption has a total impact of up to 8 parts per thousand (ppt) (with salinity in the Bay ranging between 0 ppt in fresh water, and approximately 35 ppt in Gulf of Mexico and ocean water), with the largest impacts in East Bay."	Foundation; Speculation
¶ 5	Foundation; Speculation
¶ 6(f)	Foundation
¶ 14	Foundation
¶ 16	Foundation
¶ 26 "For instance, based on Dr. Kimbro's work, the optimal range of salinity for oysters in the Bay is between 12 and 25 ppt; as Dr. Kimbro explains in his testimony, at higher salinities oyster predation becomes severe."	Foundation
¶ 34	Foundation; Speculation
¶ 42	Foundation