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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO

ADREE EDMO,

Plaintiff,

v.

IDAHO STATE BOARD OF  
CORRECTIONS; IDAHO DEPARTMENT  
OF CORRECTIONS; CORIZON INC.;  
KEVIN KEMPF; RICHARD CRAIG;  
RONA SIEGERT; AARON HOFER;  
HOWARD KEITH YORDY; SCOTT  
ELIASON; MURRAY YOUNG; AND  
CATHERINE WHINNERY

Defendants.

CIVIL ACTION FILE

NO. 1:17-cv-151-BLW

**DEFENDANTS CORIZON INC., SCOTT  
ELIASON, MURRAY YOUNG, AND  
CATHERINE WHINNERY'S JOINDER  
IN IDOC DEFENDANTS' FIRST  
MOTION FOR DISPOSITVE RELIEF**

COME NOW Defendants, Corizon Inc., Scott Eliason, Murray Young, and Catherine Whinnery ("Corizon Defendants"), by and through their counsel of record, Parsons Behle &

Latimer, and hereby submit the following Joinder in IDOC Defendants' First Motion for Dispositive Relief ("IDOC Defendants' Motion") filed November 1, 2017.

Corizon Defendants incorporate and adopt herein by reference the entirety of IDOC Defendants' Motion:

1. Arguing Plaintiff failed to exhaust administrative remedies related to claims and damages against Corizon Defendants (see Section 1 of the Analysis Section of IDOC's Memorandum in Support of IDOC's Motion),
2. Contending certain of Plaintiff's claims and damages asserted against Corizon Defendants are barred by the applicable statute of limitations (see Section 2 of the Analysis Section of IDOC's Memorandum in Support of IDOC's Motion), and
3. Asserting that Plaintiff's "Fourth Claim for Relief", including damages, under the Americans with Disabilities Act, 42 U.S.C. Section 121-1, *et seq.* against Corizon Defendants should be dismissed in its entirety because Plaintiff's alleged disability, Gender Identity Disorder/Gender Dysphoria, is specifically excluded from the definition of "disability" (See Section 3 of the Analysis Section of IDOC's Memorandum in Support of IDOC's Motion).

IDOC's Motion and supporting Memorandum, Statement of Material Facts, and Declarations filed therewith on the above-stated issues and arguments are also adopted and incorporated herein in their entirety by Corizon Defendants.

In conclusion, as argued in IDOC's Motion, Corizon Defendants also request the Court dismiss all claims, damages and relief asserted against Corizon Defendants where Plaintiff failed to exhaust his administrative remedies; bar all claims, damages, and requests for relief prior to

April 6, 2017 under the applicable statute of limitations; and dismiss Plaintiff's "Fourth Claim for Relief, including damages, brought under the Americans with Disabilities Act.

DATED this 1<sup>st</sup> day of November, 2017.

PARSONS BEHLE & LATIMER

By: /s/ Dylan A. Eaton

Dylan A. Eaton  
Counsel for Defendants Corizon Inc.,  
Scott Eliason, Murray Young, and  
Catherine Whinnery

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 1<sup>st</sup> day of November, 2017, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

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By: /s/ Dylan A. Eaton  
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