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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' REPLY  
BRIEF IN SUPPORT OF THEIR FIRST  
MOTION FOR DISPOSITIVE RELIEF**

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

DEFENDANTS CORIZON INC., SCOTT ELIASON, MURRAY YOUNG, AND CATHERINE WHINNERY'S  
JOINDER IN IDOC DEFENDANTS' REPLY BRIEF IN SUPPORT OF THEIR FIRST MOTION FOR  
DISPOSITIVE RELIEF - 1

Latimer, and hereby submits this Joinder in IDOC's Defendants' Reply in Support of their First Motion for Dispositive Relief ("Reply") filed December 6, 2017.

Corizon Defendants incorporate and adopt herein by reference the entirety of IDOC Defendants' Reply regarding Plaintiff's failure to exhaust administrative remedies (Section 1 of the Reply), certain of Plaintiff's claims are barred by the applicable statute of limitations (Section 2 of the Reply), and Plaintiff's cause of action under the ADA should be dismissed (Section 3 of the Reply).

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 Defendants' Motion for Dispositive Relief, 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 6<sup>th</sup> day of December, 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 6<sup>th</sup> day of December, 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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