

**UNITED STATES DISTRICT COURT
District of Idaho**

Exhibit List

Case Name: Adree Edmo		Plaintiff's Attorney: Lori Rifkin, Dan Stormer, Shaleen Shanbhag, Amy Whelan, Julie Wilensky, Craig Durham, and Deborah Ferguson
vs. Idaho Department of Correction, et al.		Defendant's Attorney: Dylan Eaton, Kevin West, Brady Hall, and Marisa Crecelius
Docket No.:	Trial Dates: October 10-12, 2018	Courtroom Deputy: Jamie Bracke
Presiding Judge: B. Lynn Winmill		Court Reporter: Tammy Hohenleitner

Party Offering Exhibits:
Plaintiff Adree Edmo

Instructions

- Complete only the Exhibit Number, Stipulation, Objection, and Description Columns.
- A stipulation to the admission of the exhibit, should be indicated by marking the Stipulation column with "ADM." A partial stipulation should be indicated by an abbreviation indicating the nature of the stipulation, e.g. authenticity (AUTH), foundation (FND), relevance (REL), business record exception (BRE). If no stipulation has been reached then leave blank.
- Objections should be noted by abbreviation or by reference to F.R.E., e.g. Relevance (REL or 402).
- More detailed instructions may be obtained from the Deputy Clerk and are provided with the accompanying materials.

Exhibit Number	Date Offered	Stipulation	Objection	Ruling (for use by Court)	Description	Notes (for use by Court)
1001					Excerpt from Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition re "Gender Dysphoria"	
1002					Certificate of Live Birth, date issued August 7, 2018	
1003					Curriculum Vitae of Randi Ettner, PhD	
1004					Curriculum Vitae of Ryan Nicholas Gorton, M.D.	
1005					Idaho Department of Correction Rule 35 Examination by Joel Andrade, PhD (Audio file)	
1006					Excerpts of Idaho Department of Correction Concern and Health Service Request forms, various dates (IDOC H pp. 35, 52-53, 55; AE 0087, 0089, 0091, 0103, 0108, 0113-114, 0124, 0130, 0344, 0571, 0587)	

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1007					Excerpts of Idaho Department of Correction Grievance, Concern, and Health Services Request forms, various dates (IDOC E_ pg. 65-66; IDOC_H pg. 61-62; AE 0035-36, 0055-57, 0085, 0099, 0106, 0108, 0114, 0234-235, 0265, 0572, 0587-588, 0591, 0206)	
1008					Excerpts of Idaho Department of Correction Grievance and Concern forms, various dates (IDOC H pp. 71, 81; IDOC E pp. 55-56, 121-122, 133-34; AE 0102, 0118, 0256, 0322, 0325)	
1009					Excerpts of Idaho Department of Correction Concern Forms, various dates (AE 0114, 235)	
1010					Excerpts and draft versions of Idaho Department of Correction Standard Operating Procedure (IDOC_EE_pg. 1-35)	
1011					Draft Version of Idaho Department of Correction Standard Operating Procedure, version 3.2 re "Gender Identity Disorder: Healthcare for offenders with", adopted October 31, 2002, reviewed December 21, 2011	
1012					Warden's Weekly Appointments, dated April 17, 2014 (IDOC_Yordy_pg. 6)	
1013					Excerpts from documents produced by Idaho Department of Correction Defendants as "IDOC_GG"	
1014					Drop in Mental Health Clinic note (IDOC_GG_pg. 586)	
1015					Idaho Department of Correction Information Report, dated June 26, 2018 (IDOC_GG_pg. 1119)	
1016					Email from Jeremy Clark to Yolanda Ponder re: Pre reading, GEI Advanced Mental Health Course, dated February 15, 2017 (IDOC_GG_pg. 943-944)	
1017					Email from Walter Campbell to Laura Watson re: Edmo #94691, dated November 30, 2017 (IDOC_GG_pg. 1035-1036)	
1018					Email from Jeremy Clark to Terema Carlina, et al. re: Inmates w/ Gender Dysphoria, dated January 25, 2018 (IDOC_GG_pg. 1048-1049)	
1019					Email from Walter Campbell to Kristina Waldram re MTC meeting minutes 09-13-17 and attachment, dated September 25, 2017 (IDOC_GG_pg. 472-476)	
1020					Email from Jeremy Calrk to Walter Campbell re Edmo MTC Report and attachment, dated September 21, 2017 (IDOC_GG_pg. 459-462)	

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1021					Email from Walter Campbell to Amanda Weed re can you send me those MTC notes and attachment, dated February 13, 2018 (IDOC_GG_pg. 1060-1063)	
1022					Email from Jeremy Clark to Walter Campbell re Adkisson, Hunt, Edmo IR 6.26.2018 and attachment, dated June 26, 2018 (IDOC_GG_pg. 1111-1112)	
1023					Email from Krina Stewart to Jeremy Clark re GD update, dated January 18, 2018 (IDOC_GG_pg. 1042)	
1024					Article entitled "Exploring Provider Treatment Models in Interpreting the Standards of Care, by Randall Ehrbar and R. Nicholas Gorton (IDOC_Clark_pg. 102-115)	
1025					Presentation entitled "Gender Dysphoria"	
1026					Presentation entitled "Gender Dysphoria Assessment", by Walter Campbell, PhD and Jeremy Clark, LCPC	
1027					Department of Health and Human Services, Departmental Appeals Board, Appellate Division Decision, dated May 30, 2014	
1028					National Standards to Prevent, Detect, and Respond to Prison Rape	
1029					Excerpts from FAQ section of National PREA Resource Center Website	
1030					Summary of presentation entitled "Tax Dollars at Work Treating Inmates with Gender Dysphoria", by Keelin A. Garvey, M.D. and Joel Andrade, Ph.D., excerpted from American Academy of Psychiatry and the Law, 48 th Annual Meeting, dated October 2017	
1031					Presentation entitled "Tax Dollars at Work Treating Inmates with Gender Dysphoria", by Keelin A. Garvey, M.D. and Joel Andrade, Ph.D.	
1032					Presentation entitled "Gender Dysphoria: Developing and Implementing a Successful Program in the Correctional Environment", by Joel Andrade, Ph.D.	
1033					Presentation entitled "Gender Dysphoria: A New Challenge for Corrections and Timely Solutions", by Joel Andrade PhD, Keelin Garvey, M.D., and Joseph Penn, M.D.	
1034					Presentation entitled "Gender Dysphoria: Evaluation and Treatment in the Correctional	

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					Setting”, by Joel Andrade, PhD and Keelin Garvey, M.D.	
1035					Summary of records by Krina Stewart (IDOC_Stewart_pg. 67-70)	
1036					April 2018 Idaho Department of Correction Clinician Training re Gender Dysphoria (IDOC_Stewart_pg. 10, 22-65)	
1037					Excerpt re “Borderline Personality Disorder” (IDOC_Stewart_pg. 66)	
1038					Executive Summary of “Guidelines for Psychosocial Assessments for Sexual Reassignment Surgery or Gender Affirmation Surgery”, by Julie Graham, MFT, dated November 30, 2013 (IDOC_Clark_pg. 162-196)	
1039					File of Marvin Alviso, M.D., produced at his deposition, taken August 29, 2018	
1040					[PLACEHOLDER] Plaintiff reserves the right to add additional exhibits based on documents produced by Defendants for the first time on or after October 5, 2018	
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