

UNITED STATES DISTRICT COURT
District of Idaho

Amended Exhibit List

Case Name: Adree Edmo vs. Idaho Department of Correction, et al.	Plaintiff's Attorney: Lori Rifkin, Dan Stormer, Shaleen Shanbhag, Amy Whelan, Julie Wilensky, Craig Durham, and Deborah Ferguson 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	10/10	X		ADM	Excerpt from Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition re "Gender Dysphoria"	
1002	10/11	X		ADM	Certificate of Live Birth, date issued August 7, 2018	
1003	10/10	X		ADM	Curriculum Vitae of Randi Ettner, PhD	
1004	10/11	X		ADM	Curriculum Vitae of Ryan Nicholas Gorton, M.D.	
1005					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)	
1006					Excerpts of Idaho Department of Correction Grievance, Concern, and Health Services Request	

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					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)	
1007					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)	
1008					Excerpts of Idaho Department of Correction Concern Forms, various dates (AE 0114, 235)	
1009					Excerpts and draft versions of Idaho Department of Correction Standard Operating Procedure (IDOC EE pg. 1-35)	
1010					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	
1011					Warden's Weekly Appointments, dated April 17, 2014 (IDOC Yordy pg. 6)	
1012					Excerpts from documents produced by Idaho Department of Correction Defendants as "IDOC GG"	
1013					Drop in Mental Health Clinic note (IDOC_GG_pg. 586)	
1014					Idaho Department of Correction Information Report, dated June 26, 2018 (IDOC GG pg. 1119)	
1015					Email from Jeremy Clark to Yolanda Ponder re: Pre reading, GEI Advanced Mental Health Course, dated February 15, 2017 (IDOC GG pg. 943-944)	
1016					Email from Walter Campbell to Laura Watson re: Edmo #94691, dated November 30, 2017 (IDOC GG pg. 1035-1036)	
1017					Email from Jeremy Clark to Terema Carlina, et al. re: Inmates w/ Gender Dysphoria, dated January 25, 2018 (IDOC GG pg. 1048-1049)	
1018					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)	
1019					Email from Jeremy Calrk to Walter Campbell re Edmo MTC Report and attachment, dated September 21, 2017 (IDOC GG pg. 459-462)	
1020					Email from Walter Campbell to Amanda Weed re can you send me those MTC notes and attachment,	

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					dated February 13, 2018 (IDOC_GG_pg. 1060-1063)	
1021					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)	
1022					Email from Krina Stewart to Jeremy Clark re GD update, dated January 18, 2018 (IDOC_GG_pg. 1042)	
1023					Article entitled "Exploring Provider Treatment Models in Interpreting the Standards of Care, by Randall Ehrbar and R. Nicholas Gorton (IDOC Clark pg. 102-115)	
1024					Presentation entitled "Gender Dysphoria"	
1025	10/11		X	ADM	Presentation entitled "Gender Dysphoria Assessment", by Walter Campbell, PhD and Jeremy Clark, LCPC	
1026	10/12		X	sustain	Department of Health and Human Services, Departmental Appeals Board, Appellate Division Decision, dated May 30, 2014	
1027					National Standards to Prevent, Detect, and Respond to Prison Rape	
1028					Excerpts from FAQ section of National PREA Resource Center Website	
1029	10/12	X		ADM	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	
1030	10/12	X		ADM	Presentation entitled "Tax Dollars at Work Treating Inmates with Gender Dysphoria", by Keelin A. Garvey, M.D. and Joel Andrade, Ph.D.	
1031					Presentation entitled "Gender Dysphoria: Developing and Implementing a Successful Program in the Correctional Environment", by Joel Andrade, Ph.D.	
1032					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.	
1033					Presentation entitled "Gender Dysphoria: Evaluation and Treatment in the Correctional Setting", by Joel Andrade, PhD and Keelin Garvey, M.D.	

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1034					Summary of records by Krina Stewart (IDOC Stewart pg. 67-70)	
1035					April 2018 Idaho Department of Correction Clinician Training re Gender Dysphoria (IDOC Stewart pg. 10, 22-65)	
1036					Excerpt re "Borderline Personality Disorder" (IDOC Stewart pg. 66)	
1037					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)	
1038					File of Marvin Alviso, M.D., produced at his deposition, taken August 29, 2018	
1039					American Psychiatric Association Position Statements on Access to Care for Transgender and Gender Diverse Individuals and Discrimination Against Transgender and Gender Diverse Individuals	
1040					American Medical Association Resolution Re: Removing Financial Barriers to Care for Transgender Patients	
1041	10/12	X		AOM	National Commission on Correctional Health Care Position Statement Re: Transgender, Transsexual, and Gender Nonconforming Health Care in Correctional Settings	
1042					National Commission on Correctional Health Care Follow-Up Audit of Medical and Mental Health Services, Idaho Department of Correction, October 2017 (IDOC II p.1-38)	