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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO**

ADREE EDMO,	)	Case No. 1:17-cv-151-BLW
	)	
Plaintiff,	)	
vs.	)	<b>STIPULATION FOR ENTRY OF ORDER</b>
	)	<b>ALLOWING RULE 35 EXAMINATION</b>
IDAHO DEPARTMENT OF	)	
CORRECTION; HENRY ATENCIO, in	)	
his official capacity; JEFF ZMUDA, in	)	
his official capacity; HOWARD KEITH	)	
YORDY, in his official and individual	)	
capacities; CORIZON, INC.; SCOTT	)	
ELIASON; MURRAY YOUNG;	)	
RICHARD CRAIG; RONA SIEGERT;	)	
CATHERINE WHINNERY; AND	)	
DOES 1-15;	)	
	)	
Defendants.	)	
_____	)	

COME NOW Plaintiff and Defendants Idaho Department of Correction (IDOC), Henry Atencio, Jeff Zmuda, Howard Keith Yordy, Richard Craig, and Rona Siegert (collectively referred to as the “IDOC Defendants”), by and through their counsel of record, hereby stipulate for entry of an *Order* to allow the IDOC Defendants to conduct a Rule 35 examination of Plaintiff. The IDOC Defendants filed a *Motion for Rule 35 Examination* on July 24, 2018. Plaintiff’s counsel reviewed the *Motion* and reconsidered their request for the presence of an attorney at the Rule 35 examination. The parties have met and conferred again on that issue and now hereby stipulate for the entry of an *Order* as follows:

The examination will take place at 11:00 a.m. on July 31, 2018, at the Idaho State Correctional Institution (“ISCI”) in the visiting courtroom/parole hearing room, located at 13500 S. Pleasant Valley Road; Kuna, Idaho; 83634. The examination will last no longer than three (3) hours.

The examination will be conducted by Joel T. Andrade, Ph.D, whose CV is attached hereto. Dr. Andrade’s examination will consist of a clinical interview regarding the Plaintiff’s background, social history, family history, and health history in general. Dr. Andrade’s clinical interview will address the content of the Plaintiffs’ experts’ *Declarations* and Plaintiff’s *Declaration*, and other matters relevant to Plaintiff’s mental health including, but not limited to: Plaintiff’s prior and current mental health issues, symptoms, and treatment, including prior suicide attempts, self-harm events, and attempts at castration; Plaintiff’s pre-incarceration history of trauma, substance abuse, sexual abuse, PTSD, depression, anxiety, anguish, and stress; mental health treatment Plaintiff has received over her lifetime, including treatment for Gender Dysphoria and/or Gender Identity Disorder, both prior to and after her incarceration; the treatment, therapy, and accommodations that IDOC has provided to the Plaintiff; any and all

treatment and accommodations that Plaintiff has requested be provided by IDOC, but has allegedly been denied; and Plaintiff's current level of functioning and interactions with IDOC staff, clinicians, treatment providers, and other inmates.

Dr. Andrade's clinical interview will not include any testing. The interview will be audio recorded. Plaintiff will be permitted to have one (1) non-attorney representative present during the interview. Plaintiff will select and identify a paralegal to attend as the non-attorney representative. That representative may monitor the interview, but shall not participate in or disrupt it. The representative will not obstruct the interview and will not assert objections to the questions asked or examination performed, although Plaintiff and counsel reserve the right to assert objections following completion of the examination. Plaintiff will designate the name of the representative to counsel for the IDOC Defendants 24 hours in advance of the interview.

Plaintiff's concerns about the clinical interview are alleviated by the presence of a non-attorney representative, the recording of the interview, and Dr. Andrade's written Rule 35(b) report. Accordingly, the parties hereby stipulate and request that the Court enter the proposed *Order* provided to the Court on July 24, 2018.

Dated this 25<sup>th</sup> day of July, 2018.

/s/ Lori Rifkin  
Lori Rifkin  
*Attorney for Plaintiff*

Dated this 25<sup>th</sup> day of July, 2018.

/s/ Brady J. Hall  
Brady J. Hall  
*Attorney for IDOC Defendants*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 25<sup>th</sup> day of July, 2018, 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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