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

ADREE EDMO (a/k/a MASON EDMO),

Plaintiff,

v.

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.

Case No.: 1:17-cv-00151-BLW

**JOINT PROPOSED UPDATE TO  
DISCOVERY PLAN**

Complaint Filed:	April 6, 2017
Discovery Cut-Off:	None Set
Motion Cut-Off:	None Set
Trial Date:	None Set

Plaintiff Adree Edmo and Defendants Idaho Department of Correction and Corizon, Inc., et al., by and through their respective counsel, hereby submit this proposed update to the Joint Discovery Plan pursuant to this Court's directive at the September 16, 2019 telephonic scheduling conference. Dkt. 212. The scope of remaining discovery was set forth in the parties' Discovery Plan filed January 15, 2019. Dkt. 159. As discussed during the scheduling conference, disputes exist between the parties as to the claims moving forward in this Court that may affect the discovery plan. However, the parties have been able to reach agreement on a proposed discovery and pre-trial schedule, as set forth below. Given Defendants' impending motion for a stay and the need for the Court to rule on this motion, rather than proposing specific dates, the parties have agreed to propose a timeline running from the date of the Court's order on Defendants' forthcoming motion.

Fact Discovery Cut-off: 4 months after Court ruling on stay motion

Plaintiff's Expert Disclosure: 1 month after fact discovery cut-off

Defendants' Expert Disclosure: 6 weeks after plaintiff's expert disclosure

Rebuttal Expert Disclosure: 3 weeks after defendants' expert disclosure

Expert Discovery Cut-off: 1 month after rebuttal expert disclosure

Dispositive Motion Filing Deadline: 1 month after expert discovery cut-off

This schedule includes 8 months and 1 week total for completion of all discovery, and 1 month subsequent to discovery for filing of any dispositive motions.

Dated: September 20, 2019

Respectfully Submitted,  
FERGUSON DURHAM  
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NATIONAL CENTER FOR LESBIAN RIGHTS  
RIFKIN LAW OFFICE

By: /s/ - Lori Rifkin  
Lori Rifkin  
Attorneys for Plaintiffs

Dated: September 20, 2019

By: /s/ - Brady Hall  
Brady Hall  
Attorneys for IDOC Defendants

Dated: September 20, 2019

By: /s/ - Dylan A. Eaton  
Dylan A. Eaton  
Attorneys for Corizon Defendants

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 20th day of September, 2019, 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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