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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.)	DECLARATION OF PETER E. THOMAS
)	IN SUPPORT OF DEFENDANTS'
IDAHO DEPARTMENT OF)	JOINT RESPONSE IN OBJECTION TO
CORRECTION; HENRY ATENCIO, in)	PLAINTIFF'S MOTION FOR
his official capacity; JEFF ZMUDA, in)	REASONABLE ATTORNEYS' FEES
his official capacity; HOWARD KEITH)	AND EXPENSES THROUGH
YORDY, in his official and individual)	SEPTEMBER 30, 2021
capacities; CORIZON, INC.; SCOTT)	
ELIASON; MURRAY YOUNG;)	
RICHARD CRAIG; RONA SIEGERT;)	
CATHERINE WHINNERY; AND)	
DOES 1-15;)	
)	
Defendants.)	
_____)	

I, Peter E. Thomas, hereby declare and state as follows:

**DECLARATION OF PETER E. THOMAS IN SUPPORT OF DEFENDANTS'
JOINT RESPONSE IN OBJECTION TO PLAINTIFF'S MOTION FOR REASONABLE
ATTORNEYS' FEES AND EXPENSES THROUGH SEPTEMBER 30, 2021 - 1**

1. This declaration is submitted in support of Defendants' Joint Response in Objection to Plaintiff's Motion for Reasonable Attorneys' Fees and Expenses. I have personal knowledge of the matters stated in this Declaration and could and would competently testify to these facts.

2. With regard to my office's representation of the IDOC Defendants, the hourly rate for attorney time in this matter is \$150 for partners and \$125 for associates.

3. My office did not receive any "meet and confer" letter regarding Plaintiff's Bill of Costs.

DATED this 22nd day of November, 2021.

MOORE ELIA & KRAFT, LLP

/s/ Peter E. Thomas

Peter E. Thomas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 22nd day of November, 2021, I electronically served the foregoing document with the CM/ECF system which will send electronic notification of this filing to the following:

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/s/ Peter E. Thomas
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