

Phillip J. Collaer – ISB No. #3447
ANDERSON, JULIAN & HULL LLP
C. W. Moore Plaza
250 South Fifth Street, Suite 700
Post Office Box 7426
Boise, Idaho 83707-7426
Telephone: (208) 344-5800
Facsimile: (208) 344-5510
E-Mail: pcollaer@ajhlaw.com

Attorneys for Defendants, Sharon Harrigfeld,
Betty Grimm, and the Idaho Department
of Juvenile Corrections

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO

RHONDA LEDFORD, an individual;
RAYMON GREGSTON, an individual; JO
MCKINNEY, an individual; SHANE PENROD,
an individual; KIM MCCORMICK, an
individual; BOB ROBINSON, an individual;
and GRACIE REYNA, an individual; LISA
LITTLEFIELD, an individual; ADDISON
FORDHAM, an individual; TOM DE KNIJF, an
individual; and FRANK FARNWORTH, an
individual,

Plaintiffs,

vs.

IDAHO DEPARTMENT OF JUVENILE
CORRECTIONS, an executive department of
the State of Idaho; IDJC DIRECTOR SHARON
HARRIGFELD, in her individual and official
capacities; IDJC JUVENILE CORRECTIONS
CENTER – NAMP SUPERINTENDENT
BETTY GRIMM, in her individual and official
capacities; and DOES 1-20,

Defendants.

Case No. 1:12-cv-00326-BLW

**AFFIDAVIT OF RICHARD DUKE
IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT**

**AFFIDAVIT OF RICHARD DUKE IN SUPPORT OF DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT - 1**

individuals on the interview panel included Dave Rohrbach, Pat Thomson, myself and 1 or 2 other individuals whom I cannot recall.

5. I recall the panel interviewing 3 individuals. One of the candidates was Laura Roters. Prior to conducting the interviews, I did not discuss, with anyone, who should be selected for the position. When I began my work on the panel, I had no preconceived ideas concerning who would be selected for the position.

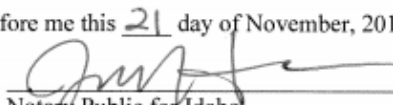
6. After all of the candidates were interviewed, I recall the members of the interview panel discussing the merits of each of the individual candidates. This discussion lasted approximately 30-45 minutes and, involved a candid assessment of the strengths and weaknesses of each candidate and, which individual each of us felt was the best candidate for the job. Through that process, I came to the conclusion that Laura Roters was the best candidate for the job. My conclusion was based upon the manner in which she responded to questions during the interview, her significant experience working in the Choices program, her extensive knowledge of the PBIS facility standards, and the direction that she wanted the programs to take. After discussing the merits of each of the candidates, the panel collectively determined that, Ms. Roters was the most qualified for the job. We recommended that she be offered the position to the Superintendent, Betty Grimm.

FURTHER your Affiant saith naught.


Richard Duke



SUBSCRIBED AND SWORN to before me this 21 day of November, 2013


Notary Public for Idaho
Residing at Ada
My Commission Expires: 12/6/2018

AFFIDAVIT OF RICHARD DUKE IN SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT - 3

CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 25 day of November, 2013, I served a true and correct copy of the foregoing **AFFIDAVIT OF RICHARD DUKE** by delivering the same to each of the following attorneys of record, by the method indicated below, addressed as follows:

Andrew T. Schoppe	<input type="checkbox"/>	U.S. Mail, postage prepaid
LAW OFFICE OF ANDREW T.	<input type="checkbox"/>	Hand-Delivered
SCHOPPE	<input type="checkbox"/>	Overnight Mail
910 W. Main Street, Ste 358	<input type="checkbox"/>	Facsimile
Boise, ID 83702	<input checked="" type="checkbox"/>	ECF
Telephone: (208) 450-3797		
Fax: (208) 392-1607		



Phillip J. Collaer

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SUMMARY JUDGMENT - 4**