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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 – NAMPA SUPERINTENDENT  
BETTY GRIMM, in her individual and official  
capacities; and DOES 1-20,

Defendants.

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

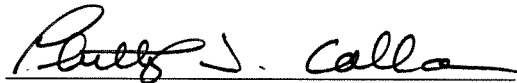
**SUPPLEMENTAL AFFIDAVIT OF  
PHILLIP J. COLLAER IN  
SUPPORT OF DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT**

STATE OF IDAHO )  
                                          ) ss:  
County of Ada       )

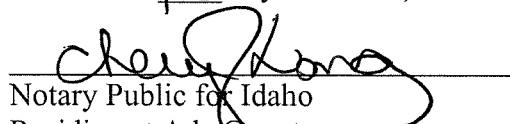
Phillip J. Collaer, being first duly sworn, deposes and says as follows:

1. That, at all times relevant, your affiant has been an attorney duly licensed to practice law within the State of Idaho. As such, your affiant is a member of the law firm of Anderson, Julian and Hull, attorneys for defendants in the above-entitled case. Per the court's Docket No. 64, affiant has provided redacted copies of the exhibits relating to the deposition transcripts of Sharon Harrigfeld, Betty Grimm, Julie Cloud and Laura Roters. The information contained herein is of your affiant's own personal knowledge.
2. Attached hereto and identified as Exb. 1, is a redacted copy of the oral deposition of Sharon Harrigfeld taken September 23, 2013 in Boise, Idaho.
3. Attached hereto and identified as Exb. 2, is a redacted copy of the oral deposition of Betty Grimm taken September 13, 2013.
4. Attached hereto and identified as Exb. 3, is a redacted copy of the oral deposition of Julie Cloud taken September 20, 2013 in Boise, Idaho.
5. Attached hereto and identified as Exb. 4, is a redacted copy of the oral deposition of Laura Roters taken September 16, 2013 in Boise, Idaho.

FURTHER your Affiant saith naught.

  
Phillip J. Collaer

SUBSCRIBED AND SWORN to before me this 10 day of March, 2014

  
Notary Public for Idaho  
Residing at Ada County  
My Commission Expires: 2/27/2016

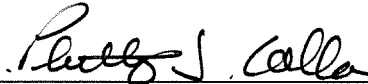


CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 10 day of March, 2014, I served a true and correct copy of the foregoing **SUPPLEMENTAL AFFIDAVIT OF PHILLIP J. COLLAER** by delivering the same to each of the following attorneys of record, by the method indicated below, addressed as follows:

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\_\_\_\_\_  
Phillip J. Collaer