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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO

ADREE EDMO,

Plaintiff,

v.

IDAHO DEPARTMENT OF CORRECTION;  
HENRY ATENCIO, in his official capacity;  
JEFF ZMUDA, in his official capacity; AL  
RAMIREZ, in his official capacity; HOWARD  
KEITH YORDY; CORIZON, INC.; SCOTT  
ELIASON; MURRAY YOUNG; RICHARD  
CRAIG; RONA SIEGERT; CATHERINE  
WHINNERY; AND DOES 1-15;

Defendants.

Case No. 1:17-cv-151-BLW

**DEFENDANTS' JOINT STATUS  
REPORT**

COME NOW, Defendants, Corizon Inc., Scott Eliason, Murray Young, and Catherine Whinnery, by and through their counsel of record, Parsons Behle & Latimer, and the Idaho Department of Correction, Henry Atencio, Jeff Zmuda, Howard Keith Yordy, Al Ramirez, Richard

Craig, and Rona Siegert, by and through their counsel of record, Moore Elia Kraft & Hall, LLP (collectively referred to as “Defendants”), and hereby submit their Joint Status Report required per this Court’s Order Requiring Defendants Provide All Pre-Surgical Treatments and Related Corollary Appointments or Consultations Necessary for Gender Confirmation Surgery (Dkt. 225) (hereinafter “Order”).

Defendants reserve and do not waive any and all objections and arguments raised by Defendants at any time in this case or on appeal, including but not limited to, objections and arguments to the Court’s Order (Dkt. 225) and required pre-surgical treatment.

First, the Court has ordered that “Defendants must arrange for and see that Ms. Edmo receive complete hair removal from the surgical site by either laser hair removal or electrolysis. Ms. Edmo must receive her first hair removal treatment on or before November 8, 2019.” Defendants have scheduled Ms. Edmo for her first laser hair removal treatment on or before November 8, 2019. The location and exact date and time of this first laser hair removal treatment appointment are filed separately under seal and is for Attorney Eyes Only and for the benefit of the Court. IDOC Defendants are working with Corizon Defendants for the transport and security arrangements needed for this appointment. At this time, it is Defendants understanding that approximately 6 separate treatment sessions (one session about every 6 weeks) will need to be scheduled for the hair removal process required by the Gender Confirmation Surgery surgeon. Defendants plan to continue to coordinate with the laser hair removal facility regarding these future hair removal appointments.

Second, the Court has ordered Defendants to “ensure that the required treating physician referral letter, as described in Plaintiff’s presurgical submission (DKt. 224 at 2), is provided by Ms. Edmo’s current treating prison physician to Dr. Stiller on or before December 31, 2019.” It

is defendants understanding that surgeon, Dr. Geoffrey Stiller, would typically require a letter from the physician managing the patient's hormone therapy. In this case, Ms. Edmo's hormone provider, prescribing and managing Ms. Edmo's hormone therapy, is an offsite consultant (who is not a Corizon employee). Additionally, Plaintiff's counsel has offered to use their expert, Dr. Gorton, to provide such a letter to surgeon Dr. Stiller. Defendants have had initial discussions with Ms. Edmo's offsite hormone therapy physician as well as with Plaintiff's counsel and are considering these options to meet the Court's December 31, 2019 deadline.

Third, the Court ordered that "Defendants must also ensure that the requisite payment approval for the gender confirmation surgery is provided to Dr. Stiller as soon as possible." After a status conference with the court earlier this week, it was Defendants understanding that the order regarding payment approval of the gender confirmation surgery, which is still stayed at this time, would be conditional on the stay being lifted. Nevertheless, Defendants will stand ready to move as quickly as reasonably possible to approve payment for such surgery should the stay on the gender confirmation surgery be lifted. Defendants note that they will need to know what exact surgery is being required of the court in order to make payment arrangements. Per Court order, Defendants have made arrangements for payment approval of the laser hair removal procedures addressed above.

DATED this 1<sup>st</sup> day of November, 2019.

PARSONS BEHLE & LATIMER

By: /s/ Dylan A. Eaton

Dylan A. Eaton  
Counsel for Defendants Corizon Inc.,  
Scott Eliason, Murray Young, and  
Catherine Whinnery

DATED this 1<sup>st</sup> day of November, 2019.

MOORE ELIA KRAFT & HALL, LLP

By: /s/ Brady J. Hall

Brady J. Hall

Counsel for Defendants Idaho Department of  
Correction, Henry Atencio, Jeff Zmuda, Howard  
Keith Yordy, Al Ramirez, Richard Craig, and  
Rona Siegert

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 1<sup>st</sup> day of November, 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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By: /s/ Dylan A. Eaton  
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