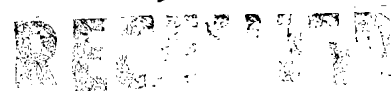


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52,220 K



8 IN THE UNITED STATES DISTRICT COURT
 9 FOR THE DISTRICT OF MONTANA, HELENA DIVISION

OCT 15 1996

10 * * * * *

NATIONAL LEGAL HOUSE
 FOR LEGAL SERVICES, INC.
 No. CV-96-49-H-CCL

11 SHIRLEY SMALL, et. al.,)
)
 12 Plaintiffs,)
)
 13 v.) DEFENDANTS' PREDISCOVERY
) DISCLOSURE STATEMENT
 14 STATE OF MONTANA, et. al.,)
)
 15 Defendants.)

16 * * * * *

17 In accordance with Rule 200-5(a) of the Rules of this Court
 18 and this Court's scheduling order of November 7, 1996, the
 19 Defendants submit the following prediscovery disclosure:

20 1 Factual Basis For Every Claim and Defense

21 This is an action brought pursuant to 42 U.S.C. § 1983, and 42
 22 U.S.C. § 12101, the Americans With Disabilities Act, to enjoin the
 23 financing and reconstruction of Montana State Hospital (MSH), and
 24 require the Defendants to develop a comprehensive system of
 25 community treatment for mentally ill patients. (Complaint, ¶ 1, pg
 26 2.) The complaint seeks class certification.

1. DEFENDANTS' PREDISCOVERY DISCLOSURE STATEMENT

1 The Defendants have generally denied the allegations of the
2 complaint and have urged abstention, res judicata, judicial
3 estoppel and oppose the class certification.

4 The State Hospital at Warm Springs is located on a large
5 campus. In the late 1960s the hospital housed about 1,700
6 patients. Repeated downsizing over the years has resulted in a
7 current patient load of about 200. These patients, as well as
8 administration and support services, are housed in a number of
9 buildings scattered about the campus. Many of the buildings do not
10 meet current accreditation standards and do not provide desirable
11 therapeutic environments.

12 Recognizing these problems with its physical plant, the
13 Department of Public Health & Human Services (DPHHS), determined
14 that a new facility would be necessary to meet standards for
15 licensure, certification and accreditation. At present, about 150
16 of the 200 patients at the hospital are housed in buildings that do
17 not meet and cannot economically meet the standards. Only one of
18 the hospital's buildings is currently licensed and none of the
19 hospital is accredited. DPHHS accordingly requested the 1995
20 Legislature for authority to build a new hospital.

21 The 1995 Legislature enacted the legislation requested. It
22 authorized DPHHS to enter into a loan agreement with the Montana
23 Health Facility Authority (HFA), for the purposes of financing the
24 costs of the new building. Loan funds would be raised through
25 revenue bonds issued by HFA. The obligations of DPHHS under the
26 loan agreement were to be paid solely from facility revenue of the

1 State Hospital and the Mental Health Nursing Care Center. Pursuant
2 to the legislation, the State has expended nearly \$2 million for
3 assessment of the facility, development of environmental and site
4 analyses, a master plan, architectural design, underwriting costs,
5 and demolition.

6 The new facility is designed to improve the efficiency of the
7 Hospital's operations in a number of ways, and to provide a more
8 therapeutic environment for its patients. The new facility will
9 eliminate use of several older buildings and more than half of the
10 currently occupied floor space. Cost efficiencies will include
11 lower utility expenses, reduction of expenses associated with
12 transporting food, equipment, patients and staff, reduction of
13 maintenance and house cleaning costs, and reduction of overall
14 staffing levels.

15 Montana State Hospital has been and is the only long-term in-
16 patient adult psychiatric facility in the state. In 1994, the
17 DPHHS contracted with Ernest & Young Mental Health Services, a
18 consulting firm, to conduct an analysis of the needed capacity at
19 the hospital. The consultants considered a wide range of
20 variables, including changes in treatment programs, managed care
21 and public mental health services, population growth in the state,
22 potential for patients to be in a less restrictive setting, and
23 efficient levels of bed occupancy. The experience of public mental
24 health programs in other states, the judgment of the staff at the
25 State Hospital, the input of planning task forces, which included
26

3. DEFENDANTS' PREDISCOVERY DISCLOSURE STATEMENT

1 patients and community representatives, and trends in utilization
2 at the Hospital, were all considered.

3 At the time the study was done, the Hospital was divided into
4 five units, forensic, psychosocial, acute care, geriatric care, and
51 medical treatment. There were 205 patients at the facility. The
6 analysis resulted in a plan to reduce the beds operated at the
7 State Hospital to a total of about 166: 110 in hospital beds in new
8 construction plus 56 in existing residential/transitional beds.
9 The planning for the replacement facility at the State Hospital
10 assumed that much of the care currently provided there would be
11 provided in community-based settings. It also contemplated that
12: the new facility could be accredited.

13 in July, 1996, the Hospital housed 194 patients. They were
14 classified by commitment types as follows:

15 Type of Commitment	Number
16 Court ordered detention	1
17 Criminal court ordered evaluation	2
18 Court ordered sentence	9
19 Emergency detention	1
20 Indian health services commitment	3
21 Involuntary civil commitment	133
22 Non-guilty by reason of mental incompetence	12
23 Non-resident detention	1
24 Unfit to proceed	5
25 Voluntary	27
26	

1 Tables showing the number of patients by commitment type,
2 number of patients with guardianships, status of patients on
3 forensic commitments, and re-commitments of involuntary patients
4 are attached.

5 Each of the named Plaintiffs was involuntarily committed or
6 recommitted. In each case, each of the named Plaintiffs were
7 represented by counsel. In each case, the Court specifically found
8 that Montana State Hospital was the least restrictive environment
9 appropriate to the patient's needs. Three of the named Plaintiffs,
10 Shirley Small, Edward Nelson and Charles Zwerneman, have been
11 discharged since the suit was filed, so their claims are moot.

12 2. Legal Theory Upon Which Defense is Based

13 A. Res Judicata - The six named Plaintiffs were all subject
14 to order commitments, recommitments or orders extending their
15 commitments in which it has been judicially determined that the
16 Plaintiff is seriously mentally ill, a danger to himself or herself
17 or others, and that the State Hospital is the least restrictive
18 environment appropriate his or her needs. Before persons can be
19 involuntarily confined at the State Hospital, a state district
20 court must specifically find that the Hospital is the least
21 restrictive environment.

22 The commitment statutes require that treatment be accomplished
23 in a community based setting, whenever possible, and that
24 institutionalization is allowed only when less restrictive
25 alternatives are unavailable or inadequate, or when the person's
26 mental illness so requires. §§ 53-21-101(2), (3), MCA, and 53-21-

1 120, MCA. The Montana statutory scheme gives a detainee a number
2 of rights throughout the proceedings similar to those granted to a
3 defendant in a criminal prosecution. §§ 53-21-115 and 125, MCA.
4 The detainee has the right to a jury trial on the need for
5 commitment and the standard of proof at the hearing is beyond a
6 reasonable doubt for physical facts and evidence and clear and
7 convincing evidence as to all other matters. § 53-21-126, MCA.

8 The Montana statutory scheme requiring individual
9 determination of the appropriateness of placement before commitment
10 is as to each involuntarily committed patient or criminally
11 committed patient a guarantee that the patient is in the right
12 place. Voluntary patients can leave the Hospital on no more than
13 five days' notice. § 53-21-111, MCA. Patients who are criminally
14 committed are subject to commitment orders based on the factors at
15 issue in the criminal proceedings. See, generally, § 46-14-101,
16 et. seq., MCA.

17 B. No Right to Community-Based Care - Nearly all of the
18 courts that have considered whether there is a right to **community-**
19 **based care** have determined that there is no absolute right to
20 community care based either on the Americans With Disabilities Act
21 or on a constitutional basis. Cases supporting this statement are
22 discussed in detail at pages 9 through 18 of Defendants' Brief In
23 Support Of Motion For **Partial** Judgment on The Pleadings, and will
24 not be recited here.

25 C. Abstention May Be Appropriate - *Ihler v. Chisholm*, Lewis
26 and Clark County No. ADV-88-383, was a class action upon behalf of

1 the patients at Warm Springs. Although the case dealt with general.
2 conditions and treatment of patients, primarily on the forensic and
3 extended treatment units at the Hospital, it also included other
4 issues. Among those were the right to community-based as opposed
5 to institutional care as a matter of right under state and federal
6 law. In her decisions and orders of January 23, 1991, at pages 31-
7 33, and March 6, 1991, the Court rejected plaintiffs' claims that
8 they were entitled to community-based-care. The Court specifically
9 considered and relied on the federal Constitution and the
10 Rehabilitation Act of 1973, as well as cases from other
11 jurisdictions in considering the issues.

12 The Plaintiffs are different here, although if this action is.
13 certified there may be some overlap, and the issue is slightly
14 different, as the asserted right to community-based care is not
15 based on the Rehabilitation Act or on the federal Constitution, but
16 on the ADA. Accordingly, *Ihler* may not have decided the precise
17 issue here. Nonetheless, the issue in *Ihler* is close enough that
18 the Court here may wish to abstain.

19 D. Guardianships - Three of the six named 'Plaintiffs have
20 guardians appointed. The guardianships are limited. The
21 Defendants have not yet fully researched the implications of these
22 limited guardianships, but may raise the issue of the competence of
23 the Plaintiffs to proceed.

24 3. Witnesses - The following people are known to have
25 discoverable information:
26

1 1. Peter Blouke, Director, DPHHS, planning, studies and
2 determination leading to legislative requests for construction of
3 a new hospital at Warm Springs; development of site and
4 architectural plans for the new hospital, including provision of
5 community services, population study, staffing and costs.

6 2. Dan Anderson, Administrator, addictive and mental
7 disorders division, DPHHS, planning, studies and determination
8 leading to legislative requests for construction of a new hospital
9 at Warm Springs; development of site and architectural plans for
10 the new hospital, including provision of community services,
11 population study, staffing and costs.

12 3. Carl Keener, M.D., Medical Director, Montana State
13 Hospital, planning and accreditation considerations for new
14 hospital, nature of current and projected population of patients,
15 provision of care and professional staffing necessary in current
16 and new hospital, condition of patients in hospital.

17 4. Kreg Jones, Vice President for Municipal Finance, D.A.
18 Davidson, Great Falls, Montana, health care facility financing,
19 including the plan for issuance of bonds for the new facility at
20 Warm Springs, and matters in his affidavit of August 19, 1996.

21 5. Ed Amberg, Quality Assurance Director, Montana State
22 Hospital, statistical information concerning patients, including
23 numbers by commitment types, information on guardianships, status
24 of clinical reviews, general suitability of population at Warm
25 Springs for community placements.

1 6. Virginia Hill, M.D., Staff Psychiatrist, MSH, condition
2 and treatment needs of patients at MSH and specifically the named
3 Plaintiffs.

4 7. John Van Hassell, PhD., Staff Psychologist, MSH,
5 condition and treatment needs of patients at MSH and specifically
6 the named Plaintiffs.

7 a. Judie Bowman, PhD., condition and treatment needs of
a patients at MSH and specifically the named Plaintiffs.

9 9. Paul Mayer, M.D., condition and treatment needs of
10 patients at MSH and specifically the named Plaintiffs.

11 10. Carol Smith, MS, Psychologist Specialist, MSH, condition
12 and treatment needs of patients at MSH and specifically the named.
13 Plaintiffs.

14 11. Beda Lovitt, Staff Attorney, DPHHS, department policies
15 and practices concerning court proceedings and commitments of
16 patients.

17 12. If this certified as a class action, additional staff
18 members may be necessary as witnesses.

19 13. The Plaintiffs.

20 4. Exhibits -

21 1. Excerpts from the clinical records and patient chart at
22 MSH of each of the named Plaintiffs, and selected other patients.

23 2. Commitment, recommitment and commitment extension orders
24 of each the named Plaintiffs.

25 3. Commitment, 'recommitment or commitment extension orders
26 for all involuntarily committed hospital residents.

1 4. Bed need planning report from Ernest & Young.

2 5. Statistical data concerning patient commitment types,
3 guardianships, and status of patients on forensic commitment and
4 involuntary commitments.

5 6. Summary of patient discharge readiness with assessment of
6 discharge needs.

7 7. Court orders re: community services from *Ihler v.*
a *Chisholm*.

9 a. Site and architectural plans for new hospital.

10 9. Tables of expenditures incurred for new hospital
11 construction.

12 10. Agreements between DPHHS and HFA for bond financing.

13 5. Computation of Damages - inapplicable.

14 6. Available insurance - Inapplicable.

15 Respectfully submitted this 13th day of November, 1996.

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25 BY: by Keith Keller
26 Keith Keller
Attorneys for Defendants

CERTIFICATE OF SERVICE

I, Keith Keller, one of the attorneys for the Defendants,
hereby certify that the DEFENDANTS' PREDISCOVERY DISCLOSURE
STATEMENT was duly served by mail, postage prepaid thereon at
Helena, Montana, and directed to:

Lonnie J. Olsen
Allen Smith, Jr.
Maire Gallagher
C.J. Lassila
Montana Advocacy Program
P. O. Box 1680
Helena, Montana 59624

on the 13th day of November, 1996.

Original signed
by P. Keith Keller

Keith Keller

DEPARTMENT OF
PUBLIC HEALTH AND HUMAN SERVICES



MARC RACICOT
GOVERNOR

PETER S. BLOUKE, PhD
DIRECTOR

STATE OF MONTANA

(406) 593-7000
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Montana State Hospital
Warm Springs, Montana 59756-0300

MEMORANDUM

July 26, 1996

To: Dan Anderson, Administrator
Addictive and Mental Disorders Division

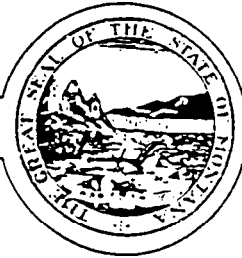
From: Ed Amberg *EA*
Quality Assurance Director

Subject: *Information on Patient Commitment Types for MP Lawsuit*

The number of patients by commitment type on 7/22/96 was as follows:

Court Ordered Detention	1	
Criminal Court Ordered Evaluation	2	(including one on temporary court custody status)
Court Ordered Sentence	9	
Emergency Detention	1	
Indian Health Service Commitment	3	
Involuntary Civil Commitment	133	
NGMI	12	
Non-Resident Detention	1	
Unfit to Proceed	5	
Voluntary	27	

DEPARTMENT OF
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Montana State Hospital
Warm Springs, Montana 59756-0300

MEMORANDUM

July 26, 1996

To: Dan Anderson, Administrator
Addictive and Mental Disorders Division

From: Ed Amberg *EA*
Quality Assurance Director

Subject: ***Information on Guardianships for Response to MAP Lawsuit***

Presently, ninety-five (95) patients at Montana State Hospital have a guardian. Eleven (11) of these are Full Guardianship status, eighty-four (84) are Limited.

Seventy-four (74) of the guardians are Family Members or Friends of the Patient. Ten (10) are Volunteers, eight (8) are AMDD staff, and three (3) are DPHHS staff from other divisions (e.g., senior and long-term care).

Patients for whom a guardian has been appointed -	95
Number of Full Guardianship appointments -	11
Number of Limited Guardianship appointments-	8 4
Number with family or friends appointed guardian -	74
Number with volunteer guardians -	10
Number with AMDD staff guardians -	8
Number with other DPHHS guardians -	4

DEPARTMENT OF
PUBLIC HEALTH AND HUMAN SERVICES



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Montana State Hospital
Warm Springs, Montana 59756-0300

MEMORANDUM

July 29, 1996

To: Dan Anderson, Administrator
Addictive and Mental Disorders Division

From: Ed Amberg EA
Quality Assurance Director

Subject: **Information needed for MAP** lawsuit

Below is the date of the most recent clinical review of status for MSH patients on forensic commitments.

<u>Name</u>	<u>Commitment Type</u>	<u>Review Date</u>
Harriet Peltier	COD	7/29/96
Stephen Cooney	COE	N/A
Ian Hawley	COE	N/A
Cody Priddy	CO Sentence	No Review Date Reported
Terry Pyles	CO Sentence	11/5/95
Gerald Manolovits	CO Sentence	7/10/96
Ross Stone	CO Sentence	1/05/96
John Borgen	CO Sentence	5/07/96
John Malin	CO Sentence	7/10/96
Christopher Green	CO Sentence	2/22/96
Jennifer Thomas	CO Sentence	4/11/96
David Ringewold	CO Sentence	7/29/96
Paul Woods	NGMI	3/20/96
Ron Wooster	NGMI	10/93 (others have been completed since 10/93 by outside evaluators)
Russell Thompson	NGMI	4/2/96

<u>Name</u>	<u>Commitment Type</u>	<u>Review Date</u>
Belden Alexander	NGMI	10/13/95
Wayne Lubitz	NGMI	10/13/95
James Nikodym	NGMI	N/A (report due 10/96)
James Gough	NGMI	2/6/96
Gary Van Voast	NGMI	7/30/96
Sharyle Ellison	NGMI	11/14/95
Ivan Vilensky	NGMI	3/26/96
Jeffrey Allen	NGMI	10/30/95
Jessie Cote	NGMI	N/A (report due 9/96)
Joe Caddel	UTP	3/15/96
Dianne Lewis	UTP	5/2/96
Colin Mason	UTP	N/A (COE Report due 8/96)
Mark Wearley	UTP	N/A (Report due 9/96)
Kevin Olson	UTP	N/A (Report due 9/96)

MONTANA STATE HOSPITAL
 PATIENTS ON INVOLUNTARY COMMITMENT STATUS
 MOST RECENT COMMITMENT/RECOMMITMENT DATES

July 29, 1996

<u>MSH #</u>	<u>Name</u>	<u>Date</u>	
3742 1	Janice Mad Plume	3/11/96	(IHS commitment)
48940	Elmer Clark	6/6/96	(IHS commitment)
56408	Miriam Morrison	8/22/95	(IHS commitment)
31568	Terry Boggess	6/6/96	
32643	Elizabeth Jungers	6/21/96	
36206	Greg Scheeler	7/12/96	
36315	Mitchell Stempin	6/18/96	
45505	Lyndia McCranie	7/8/96	
48645	Larry Beebe	6/18/96	
51683	George Aris	6/6/96	
52117	Clayton Brock	7/17/96	
52212	Joann Reinhart	6/20/96	
54978	Susanne Larsen	7/3/96	
56677	Brian Persons	7/3/96	
56704	Mark Bloom	7/4/96	
56757	Debra Voyles	4/30/96	
56766	Miguel Vicente	5/15/96	
56801	Sandra Burgess	6/25/96	
56896	Wayne Arens	5/15/96	
56899	Barbara Bargfeld	5/24/96	
56906	Edward Horab	6/17/96	
56911	Robert Pankiewicz	6/21/96	
56912	Loretta Schmelzla	6/27/96	
56915	Elba Baldwin	7/3/96	
56918	Glenda Gooden	7/12/96	
56919	Joe Ann Hakala	7/8/96	
56920	Patricia Beckers	7/17/96	
56921	Lonnie Lindstrom	7/19/96	
17487	Robert Horn	9/12/95	
21880	Charles Little Beads	5/9/96	

<u>MSH #</u>	<u>Name</u>	<u>Date</u>	
23760	Darlene Tintinger	3/19/96	
25137	Sue Fortune	7/17/96	
26459	Dian Wallila	2/15/96	
30460	Darlene Burshia	6/18/96	
34681	Shirley Small	12/14/95	
36157	Wilfred Dobb	4/10/96	
36884	Reny Archambeau	7/15/96	
37350	Thomas Hoar	10/14/95	
37516	Karen Hallberg	4/29/96	
37938	William Harper	4/22/94	(Continued without date)
38160	Daniel Griffin	6/24/96	
38304	Harry Stuart	3/7/96	
38528	Ronald Penfold	5/22/96	
47882	Suzanne Beagle	1/14/96	
48467	Janice Siroky	5130196	
49712	Sally O'Keefe	5/16/96	
50187	Roger Fischer	5116196	
53508	Tiiomas Menager	6/7/96	(revocation of conditional release)
53659	Leona Chiefstick	3/11/96	
54059	Christine Horn	4/29/96	
55105	Carol Vihilidal	5/6/96	
56573	Susan Storme	7/15/96	
56582	David McVeigh	6/10/96	
56670	Russell Cooper	2/7/96	
56769	Jennifer Bailey	3/21/96	
56838	Kristi Schellinger-Ohs	3/20/96	
56863	Einard Vikse	5127196	
11682	Theodore Krausz	7/8/95	
16008	Gertrude Newton	5/10/96	
16940	Edna Leeper	6/14/96	
17095	Wilbur Rinehart	6/22/96	
20063	Herbert Miller	6/28/96	
22811	Ramona Coleman	8/21/95	
26464	Mary Martin	6/6/96	

<u>MSH #</u>	<u>Name</u>	<u>Date</u>	
26580	Ruth Hendrickson	12/23/95	
34245	Helen Laiben	2/21/96	
37346	Catherine Bofto	11/29/95	
37368	Jeannette Payer	5/3/96	
42157	Beatrice Leary	6/14/96	
51937	Hazel Finstad	4/18/96	
52013	Raymond Kuhlman	4/10/96	
52942	Floyd Bruno	10/5/95	
52973	Peggy Hager	12/20/95	
53753	Thomas Henderson	5/12/96	
53981	Lenore Anderson	3/19/96	
56005	Alma Gallagher	10/13/96	
56236	Patrick Long	9/24/95	
56586	Marsha Schoenecke	3/27/96	
56593	Ralph Thomas	4/12/96	
56598	Ralph Cumley	4/29/96	
56606	Dorcias Curtiss	5/28/96	
56631	Betty Benzel	7/15/95	
56701	Celestino Anaya	11/24/95	
56788	Waiter McKinnon	6/6/96	
56835	Edwin Haas	3/21/96	
56870	Evelyn Scalise	6/8/96	
56876	Louise Begger	4/17/96	
56877	Ray Stone	6/19/96	
56892	William Jeffreys	5/10/96	
56900	Ralph Dent	5/29/96	
56683	Maurice Kiely	1/10/96	
56816	Daniel Lang	1/24/96	(voluntary signed 7/3/96, effective 7/24/96)
56917	Jane Guelich	7/12/96	
13755	Elmer Brekke	8/1/95	
24654	Carol Adams	1/14/96	
25239	Andrew Adler	4/7/96	
25723	Patrick Foley	5/10/96	
29763	Stanley Crazy Mule	12/16/95	

<u>#/SH</u>	<u>Name</u>	<u>Date</u>
29920	David Malingo	3/8/96
31389	Darrell Longee	12/23/96
31877	Ed Nelson	4/29/96
33549	James Hudak	9/13/95
35149	Burnice Maynard	3/26/96
36733	Mervin Horn	8/21/95
36744	Raymond Anderson	5/13/96
37223	Timothy Patterson	12/8/95
37240	Edward Glode	8/19/95
37734	Linda Gillis	4/8/96
37739	Shane Reeves	10/16/95
37911	Robert Graham	2/19/96
37976	Charles Zwerneman	3/7/96
38269	Allen Peone	5/29/96
45492	Danine Rose	4/10/96
45917	Ann Greetan	2/5/96
46745	Tamara Young	8/17/95
48591	Conrad Beatty	10/16/95
51643	Ronald Ashcraft	12/28/95
52258	Timoth Wilson	1/13/96
52347	Gary Profit	9/21/95
53085	Colleen Tippetts	4/21/96
53485	John Whiteman	9/19/95
5366 1	Gerald Stears	6/23/96
55446	Mickaela Young	5/7/96
56483	Franklin Curtis	8/16/95
56507	John Odom	10/24/95
56550	Robin Strang	4/17/96
56562	Scott Finley	11/7/95
56656	Joseph Cox	11/26/95
56687	Karen Freebourn	11/3/95
56689	Howard Woods	11/3/95
56741	David Panter	2/11/96
56770	John McDonald	4/19/96
56841	Richard Goforth	5/7/96

MSH #

Name

Date

56853

Katrina Troester

5/10/96

56864

Manuel Casiano

5/29/96

56885

Jonathan John

4/25/96