



3. Based on my general experience with other lawyers at Stoel Rives who have been representing ISC in its ongoing disputes with Pocatello Dental Group, P.C. (the "Group"), my evaluation of the specific facts and circumstances of this case and discussion, this dispute will likely be contentious and involve complex litigation issues. The attorney fees likely to be incurred by ISC during the pendency of a preliminary injunction could easily exceed \$200,000.

4. Late in the evening on Monday, October 27, 2003, I called the phone number for the new dental office opened by Dr. Romriell, which was listed in the advertisement attached hereto as Exhibit A. Although no one answered, there was a recording. On the recording, the speaker identified herself as Shondra. Further, the recording stated that Dr. Romriell's office would be open on Tuesday, Wednesday and Friday of that week. My understanding is that the Shondra identified in the recording is Shondra Bauer, one of the staff that ISC is prohibited from terminating subject to the injunction in place at this time.

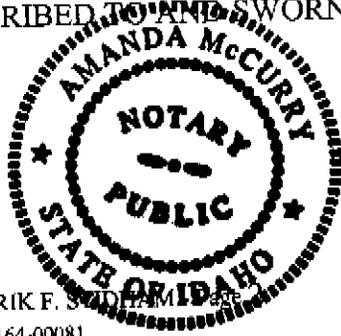
5. Attached hereto as Exhibit B is a true and correct copy of [Proposed] Order Confirming Debtor's Second Amended Joint Chapter 11 Plan of Reorganization [As Modified on July 22, 2003 and as Further Modified on September 3, 2003]. It is my understanding and belief that the United States Bankruptcy Court has adopted this Order entirely as proposed.

FURTHER THIS AFFIANT SAYETH NOT.

DATED this 3<sup>rd</sup> day of November, 2003.

Erik F. Stidham  
Erik F. Stidham

SUBSCRIBED TO AND SWORN TO before me this 3<sup>rd</sup> day of November, 2003.



Amanda McCurry  
Notary Public for Idaho  
Residing at Boise, Idaho  
My commission expires 02/15/04

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **AFFIDAVIT OF ERIK F. STIDHAM** on the following named person(s) on the date indicated below by

- mailing with postage prepaid
- hand delivery
- facsimile transmission
- overnight delivery

to said person(s) a true copy thereof, contained in a sealed envelope, addressed to said person(s) at his or her last-known address(es) indicated below.

Gary L. Cooper  
Ron Kerl  
James P. Price  
COOPER & LARSEN  
151 N. 3rd Avenue, Ste. 210  
PO Box 4229  
Pocatello, ID 83205-4229  
Phone: (208) 235-1145  
Fax: (208) 235-1182

DATED: this 3<sup>rd</sup> day of November, 2003.



G.Rey Reinhardt  
Attorneys for Defendant