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U.S. COURTS

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REC'D
 CAMERON S. BURKE
 CLERK IDAHO

Attorneys for Defendant, Micron Electronics, Inc.

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF IDAHO

KIMBERLEY SMITH, MICHAEL B.
 HINCKLEY, JACQUELINE T. HLADUN,
 MARILYN J. CRAIG, JEFFERY P.
 CLEVENGER, and TIMOTHY C.
 KAUFMANN, individually and on behalf of
 those similarly situated,

Plaintiffs,

vs.

MICRON ELECTRONICS, INC., a
 Minnesota corporation,

Defendant.

Case No. CIV 01-0244-S-BLW

**AFFIDAVIT OF GREGORY C.
 TOLLEFSON IN SUPPORT OF
 DEFENDANT'S MOTION TO FILE
 APPENDICES UNDER SEAL**

STATE OF IDAHO)
) ss.
 County of Ada)

I, Gregory C. Tollefson, being duly sworn, depose and say:

**AFFIDAVIT OF GREGORY C. TOLLEFSON IN SUPPORT OF DEFENDANT'S
 MOTION TO FILE APPENDICES UNDER SEAL - 1**

131

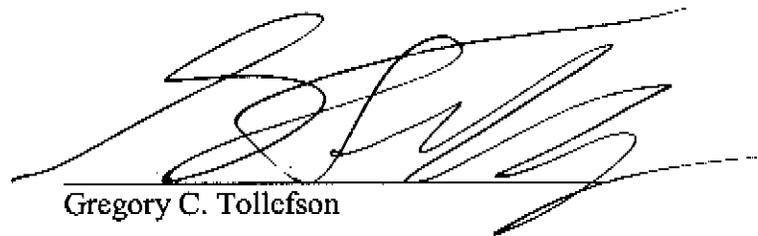
1. I am an attorney at Stoel Rives, LLP and counsel of record for Defendant Micron Electronics, Inc. I am familiar with this case and make this affidavit based on my personal knowledge. I submit this affidavit in support of Defendant's August 27, 2002 Motion to File Appendices under seal.

2. Attached hereto as "Exhibit 1" is a true and correct copy of Appendix A to Defendant's Response to Plaintiffs' Motion for Conditional Certification: "Plaintiff/Affiant Information Regarding Overtime Hours Recorded and Alleged Off the Clock Work from June 1, 1998 to May 31, 2001."

3. Attached hereto as "Exhibit 2" is a true and correct copy of Appendix B to Defendant's Response to Plaintiffs' Motion for Conditional Certification: "Claimant Information Regarding Overtime Hours Recorded and Alleged Off the Clock Work from June 1, 1998 to May 31, 2001."

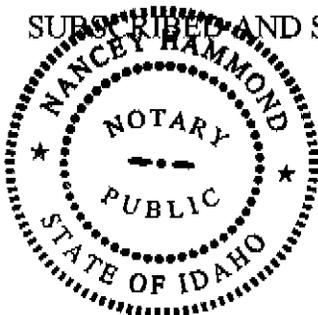
4. Appendices A and B are referenced at page 3, footnote 5, of Defendant's Response to Plaintiff's Motion for Conditional Certification, but are being filed separate from the Response brief in order to be placed under seal.

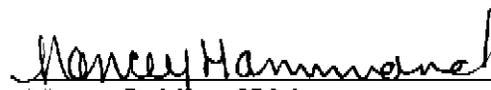
DATED this 27th day of August, 2002.



Gregory C. Tollefson

SUBSCRIBED AND SWORN TO BEFORE ME this 27th day of August, 2002.




Notary Public of Idaho
Residing at: Boise
My Commission Expires: 6/12/03

**AFFIDAVIT OF GREGORY C. TOLLEFSON IN SUPPORT OF DEFENDANT'S
MOTION TO FILE APPENDICES UNDER SEAL - 2**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 27th day of August, 2002, a true and correct copy of the foregoing **AFFIDAVIT OF GREGORY C. TOLLEFSON IN SUPPORT OF DEFENDANT'S MOTION TO FILE APPENDICES UNDER SEAL** was served upon the following:

William H. Thomas
Daniel E. Williams
Christopher F. Huntley
HUNTLEY, PARK, THOMAS,
BURKETT, OLSEN & WILLIAMS
250 S. Fifth Street, Suite 660
Boise, Idaho 83701-2188

By U.S. Mail
 By Hand Delivery
 By Facsimile
 By Overnight Delivery

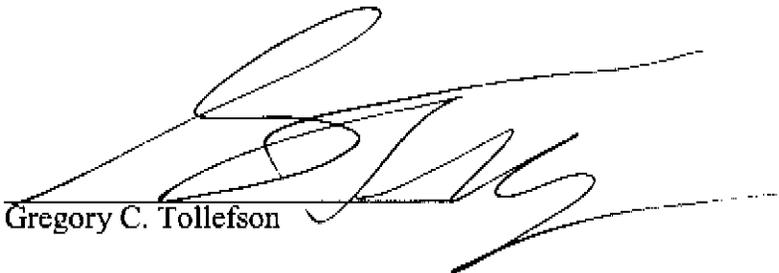

Gregory C. Tollefson

EXHIBIT 1

APPENDIX A

**PLAINTIFF/AFFLIANT INFORMATION REGARDING OVERTIME HOURS RECORDED
AND ALLEGED OFF THE CLOCK WORK FROM JUNE 1, 1998 to MAY 31, 2001**

Smith, et al. v. Micron Electronics, Inc.
Case No. CIV 01-0244-S-BLW

Plaintiff/Affiant Name	Job Title	Company	Location	Duration of Employment	Total Overtime Hours Paid	Alleged Claim(s) of Unpaid Overtime Hours
Laura Anderson	Inside Sales Rep 1 (10/99) Inside Acct. Exec. 1 (6/00)	Micron Commercial Computer Systems, Inc.	Idaho	6/1/98 to 5/31/01	6/1/98-5/31/01 22 hrs.	4-6 hrs/wk (Anderson Aff., ¶17)
Michael Angus	Inside Acct. Exec. 2	Micron Commercial Computer Systems, Inc.	Idaho	11/06/00 - 04/06/01	66.19 hrs.	1.5 hrs/day from alleged "OT bar" to 4/01 (Angus Aff., ¶¶8-9)
Jeffery Clewenger	CSB Sales Rep (11/98) Small Bus. Rep. (9/99) Small Bus. Rep. 2 (11/99)	MicronPC, Inc.	Idaho	11/09/98 - 03/23/00	267 hrs.	5-15 hours per week (Clewenger, 160-13-20)
Marilyn Craig	Corp. Sales Rep. (6/98) Inside Sales Rep (9/99) Inside Sales Rep 3 (11/99) Inside Acct. Exec. 3 (6/00)	Micron Commercial Computer Systems, Inc.	Minnesota	06/01/98 - 09/08/00	103.21 hrs.	10-20 hours per week when Chitwood was supervisor (9/98-5/01); some OT was reported (Craig, 147:11-148:1)
Rory Kip DeRouen	Corp. Sales Rep. (6/98) Inside Sales Rep. 3 (9/99) Inside Acct. Exec. 3 (6/00)	Micron Commercial Computer Systems, Inc.	Idaho	06/01/98 - 12/07/00	552.7 hrs.	6-10 hrs/wk (DeRouen Aff., ¶14)
Eric Fillmore	Small Bus. Rep 3	MicronPC, Inc.	Idaho	05/15/00 - 11/02/00	75 hrs.	6-10 hrs/wk (Fillmore Aff., ¶10)
Alan Garcia	CSB Sales Rep. (10/98) CSB Sales Rep. 2 (5/99) Sales Rep. 2 (8/99)	MicronPC, Inc. (10/98) Micron Internet Services, Inc. (6/00)	Idaho	06/01/98 - 01/01	686.75 hrs.	20 hrs/wk last 1 1/2 yrs. of empl. (Garcia Aff., ¶9), contrast with (Garcia, 61:17-67:1 "There was no time that I worked that was not recorded.")
Michael Hinckley	Small Bus. Rep 3	MicronPC, Inc.	Idaho	04/24/00 - 05/31/01	220.92 hrs.	4-7 hrs/wk from 2/01-5/01 (Hinckley, 220-5-11)
Jacqueline Hladun	Acct. Rep. (6/98) Corp. Sales Rep (9/98) Inside Sales Rep (9/99) Inside Acct. Exec. 3 (6/00)	Micron Commercial Computer Systems, Inc.	Minnesota	06/01/98 - 08/11/00	137.59 hrs.	Not specific; generally before shift, after shift, during lunch and on trips to Boise (Hladun, 48:18-49:7)
Dont Hopkins	Parts Sales Rep. 2 (3/00) Small Bus. Rep. 1 (7/00)	MicronPC, Inc.	Idaho	03/20/00 - 05/31/01	325.25 hrs.	1-2 hrs/day (Hopkins Aff., ¶11)
Timothy Kaufmann	Acct. Devel. (6/98) Federal Sales Rep. 1 (7/00)	MicronPC, Inc. (6/98) Micron Commercial Computer Systems, Inc. Micron Government Computer Systems, Inc. (7/00)	Idaho	06/01/98 - 07/99 07/10/00 - 10/06/00	203.86 hrs.	In 1999 worked "several" hrs/wk OT (Kaufmann Aff., ¶8)
Michael Larschied	DR Sales Rep.	MicronPC, Inc.	Idaho	06/01/98 - 06/02/99	254.4 hrs.	2-3 hrs/wk (Larschied Aff., ¶14)

Plaintiff/Affiant Name	Job Title	Company	Location	Duration of Employment	Total Overtime Hours Paid	Alleged Claim(s) of Unpaid Overtime Hours
Erick Little	Acct. Rep. (6/98) Corp. Sales Assoc. (8/98) Inside Sales Rep. (9/99)	Micron Commercial Computer Systems, Inc.	Minnesota	6/1/98 to 5/31/01	6/1/98-5/31/01 72.14 hrs.	8-10 hrs/wk (Little Aff., ¶16)
Carren Mattson*	Sales Assistant 1	MicronPC, Inc.	Idaho	11/27/00 - 05/31/01	13.75 hrs.	3-5 hours per week after March of 2001 (Mattson, 69:10-13), cf. Mattson Aff., ¶16 (5 hrs/wk)
Deborah Monahan	DRG Acct. Rep. (6/98) Acct. Devel. (12/98) Inside Sales Rep. 2 (9/99) Inside Sales Rep. 3 (7/00) Inside Acct. Exec. (12/00)	MicronPC, Inc. (6/98) Micron Commercial Computer Systems, Inc. (9/99)	Idaho	06/01/98 - 01/17/01	577.85 hrs.	2-5 hrs/wk (Monahan Aff., ¶9)
Jael Schoonveld	Small Bus. Rep. 1	MicronPC, Inc.	Idaho	10/16/00 - 05/31/01	25.24 hrs.	1 hr/wk (Schoonveld Aff., ¶18)
Kimberley Smith	Small Bus. Rep. 2	MicronPC, Inc.	Idaho	07/17/00 - 05/31/01	165.4 hrs.	3-5 hrs/wk (Smith, 245:10-14)
Cheryl Stumph	Consumer Sales Rep. 1 (2/00) Inside Acct. Rep. 2 (9/00) Inside Acct. Rep. 1 (10/00)	MicronPC, Inc. (2/00) Micron Commercial Computer Systems, Inc. (9/00)	Idaho	02/21/00 - 05/31/01	156.67 hrs.	"Fluctuated wildly", 10-40 hrs/wk (Stumph Aff., ¶16); supervisor allegedly altered timecard (Stumph Aff., ¶15)
Kurt Swanson	Web Sales Rep. 2 (9/99) Small Bus. Rep. 1 (2/00) Sales Rep. State/Ed. 1 (4/01)	MicronPC, Inc. (9/99) Micron Government Computer Systems, Inc. (4/01)	Idaho	09/13/99 - 05/31/01	69.5 hrs.	5-10 hrs/wk (Swanson Aff., ¶12)
Tracy Scott Wells	CSB Sales Rep. (9/98) Small Bus. Rep. (1/99)	MicronPC, Inc.	Idaho	06/01/98 - 05/31/01	1020.72 hrs.	"Couple" hrs/wk (Wells Aff., ¶13), cf. Wells, 112:1-9; 124:19-126:6 (didn't record 2-4 hrs/day working at home on unauthorized database)
Christopher Wing	Small Bus. Rep. 2	MicronPC, Inc.	Idaho	09/25/00 - 05/31/01	133.87 hrs.	"Several" hrs/wk (Wing Aff., ¶10)

* Carren Mattson, who was not an inside sales representative, is included in this appendix only because she filed an affidavit.

EXHIBIT 2

APPENDIX B

CLAIMANT INFORMATION REGARDING OVERTIME HOURS RECORDED AND ALLEGED OFF THE CLOCK WORK FROM JUNE 1, 1998 to MAY 31, 2001*

Smith, et al. v. Micron Electronics, Inc.
Case No. CIV 01-0244-S-BLW

Claimant's Name	Job Title	Company	Location	Duration of Employment	Total Overtime Hours Paid	Alleged Claim(s) of Unpaid Overtime Hours
Stefanie Bistline	CSB Sales Rep.	MicronPC, Inc.	Idaho	6/1/98 to 5/31/01 08/24/98 - 06/04/99	6/1/98-5/31/01 261.3 hrs.	Unknown
[REDACTED] Dyer	Notebook Sales Rep. (6/98) Acct. Devel. (9/98) CSB Sales Rep. (3/99)	MicronPC, Inc.	Idaho	06/01/98 - 08/16/99	204.4 hrs.	Unknown
Mathew Jarame Eil	Inside Sales Rep (1/99) Inside Sales Rep 2 (11/99) Inside Acct. Exec. 2 (6/00)	Micron Commercial Computer Systems, Inc.	Idaho	01/11/99 - 05/31/01	135.33 hrs.	2-3 hours per week (Eil, 48:4-12)
Ken Ford	Small Bus. Rep 2	MicronPC, Inc.	Idaho	10/11/99 - 05/31/01	364.7 hrs.	10-20 hours per week (Ford, 74:5-75:7)
Tim Hedding	Consumer Sales Rep. 1 (10/99) Small Bus. Rep. 2 (5/00) Inside Acct. Exec. 1 (12/00)	MicronPC, Inc. (10/99) Micron Commercial Computer Systems, Inc. (12/00)	Idaho	10/25/99 - 05/04/01	361.5 hrs.	Unknown
Ryan Keen	CSB Sales Rep 2 (10/98) CSB Sales Rep. 3 (9/99) Small Bus. Rep. 3 (11/99)	MicronPC, Inc.	Idaho	10/12/98 - 12/14/00	135.7 hrs. (does not include approx. 7 mos. of stubs. of earnings)	3-5 hours per week (Keen, 106:2-12; 108:3-12; 111:14-23)
John Paul Kurfin	Consumer Sales Rep. 2 (10/99) Small Bus. Rep 2 (1/00)	MicronPC, Inc.	Idaho	10/04/99 - 05/08/01	669.5 hrs.	Unknown
Linda Lee	Acct Dev. (9/98) Inside Sales Rep (8/99) Inside Acct. Exec. 2 (6/00)	Micron Commercial Computer Systems, Inc.	Minnesota	06/01/98 - 09/00	423.75 hrs.	Not specific; before and after shift, lunches and business trips (Lee, 49:21-50:18; 51:15-53:10)
Anthony Limani	Consumer Sales Rep. 1 (4/00) Inside Acct. Rep. 2 (11/00)	MicronPC, Inc. (4/00) Micron Commercial Computer Systems, Inc. (11/00)	Idaho	04/03/00 - 05/31/01	293.55 hrs.	Unknown
Chris McCullough	DRG Sales Rep. (6/98) Acct. Rep. (3/99) Inside Sales Rep. (9/99) Inside Sales Rep. 2 (11/99)	MicronPC, Inc. (6/98) Micron Commercial Computer Systems, Inc. (3/99)	Idaho	06/01/98 - 04/12/00	529.8 hrs.	Unknown
Laurie McGeorge	DRG Sales Rep. (3/98) Small Bus. Rep. 2 (11/99)	MicronPC, Inc.	Idaho	06/01/98 - 05/31/01	537.03 hrs.	Not specific; before/after shift, lunches (McGeorge, 29:14-22; 91:5-92:9)
Stephen Miller	Add/Parts Sales Rep. (4/99) Fed. Parts Sales Rep. 2 (11/99)	Micron Government Computer Systems, Inc.	Idaho	06/01/98 - 01/07/00	46.5 hrs.	Unknown

Claimant's Name	Job Title	Company	Location	Duration of Employment	Total Overtime Hours Paid	Alleged Claim(s) of Unpaid Overtime Hours
Isaac Moffett	Web Sales Rep. (9/99) Small Bus. Rep. 1 (2/00) Consumer Sales Rep 1 (7/00) E-Comm Rep. (10/00)	MicronPC, Inc.	Idaho	09/13/99 - 03/27/01	346.43 hrs.	500 hours of overtime (Moffett, 68-21-69-24)
Mike Moser	DRG Sales Rep. (6/98) Acct. Spec. (2/99) Small Bus. Rep 2 (6/00)	MicronPC, Inc. (6/98) Micron Commercial Computer Systems, Inc. (8/99) MicronPC, Inc. (6/00)	Idaho	06/01/98 - 12/03/99 06/19/00 - 05/31/01	758.12 hrs.	On one occasion believes the time he submitted was reduced by a couple of hours; he was paid for all other overtime he worked (Moser, 50:24-51:19; 60:22-62:7; 74:13-75:4; 79:22-80:2; 119:1-121:11)
Jeff Parrish	Small Bus. Rep. 2	MicronPC, Inc.	Idaho	05/22/00 - 05/01/01	55 hrs.	4 hours per week, after February 2001 "no overtime" directive (Parrish, 59:13-24; 68:1-4; 87:10-88:8)
Colin Reynolds	Consumer SR 1 (12/99) Sales Rep. 1 (4/00) Consumer SR 1 (6/00) Ins. Acct. Rep. 2 (10/00) Ins. Acct. Exec. 1 (1/01)	MicronPC, Inc. (12/99) Micron Commercial Computer Systems, Inc. (10/00)	Idaho	12/20/99 - 03/05/01	98.5 hrs.	Unknown
April Rinehart	CSB Sales Rep. (9/98) CSB Sales Rep. 3 (4/99) Web Small Bus. Rep. (8/99) Small Bus. Rep. 2 (11/99)	MicronPC, Inc.	Idaho	09/14/98 - 02/07/01	567.5 hrs.	Unknown
Cheryl Leighann Sanderson	Small Bus. Sales Rep. 1	MicronPC, Inc.	Idaho	12/20/99 - 12/29/00	18 hrs.	Unknown
John Seale	DR Sales Assoc. (4/96) Sales Rep. (9/96)	MicronPC, Inc.	Idaho	06/01/98 - 05/31/01	367.25 hrs.	Unknown
Jim Wells	DR Sales Assoc. (6/98) Small Bus. Rep. (6/99)	MicronPC, Inc.	Idaho	06/01/98 - 05/30/01	263 hrs.	Not specific; varied; sometimes during lunch and after his shift (Wells, 103:10-104:13; 154:25-155:20)

This chart does not include individuals who have withdrawn their consents (Bland Ballard, Matthew Flynn, Cheryl Kunshier); individuals who did not appear for their depositions and are the subject of defendant's Unopposed Motion to Strike Consents and Dismiss Claimants (Docket no. 103); (Michael Carr, Michael Jordan, Michelle Milliken); and individuals who were not inside sales representatives during the relevant time (John Caprai, Nanci Ull). Carren Mattison, who was not an inside sales representative, is included in Appendix A only because she filed an affidavit.