

Exhibit ER

to

The City and Borough of Juneau and Rorie Watt's Cross-Motion
for Summary Judgment and Opposition to Plaintiffs' Motion for
Summary Judgment

and

The City and Borough of Juneau and Rorie Watt's Objections
and Responses to Plaintiffs' Statement of Facts in Support of
Motion for Summary Judgment

and

The City and Borough of Juneau and Rorie Watt's Statement of
Facts in Support of CBJ's Cross-Motion for Summary Judgment
and in Support of CBJ's Motion to Strike Certain Exhibits

[FILED UNDER SEAL]