

Exhibit IB

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]