

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

CHRISTOPHER ROLLER,

Plaintiff,

vs.

SIOUX VALLEY HOSPITALS AND
HEALTH SYSTEM,

Defendant.

CIV. 05-1420-RHK-AJB

AFFIDAVIT OF KIM J. PATRICK

STATE OF SOUTH DAKOTA)

: ss.

COUNTY OF MINNEHAHA)

Kim J. Patrick, being first duly sworn upon oath, states and alleges as follows:

1. I am general counsel for Sioux Valley Hospitals & Health System, Defendant in the above-captioned matter.

2. Plaintiff's Complaint references his admission to "Sioux Valley Mental Hospital" on August 24, 2000, as a basis for his Complaint. Sioux Valley Hospital – not Sioux Valley Hospitals and Health System – was the entity that operated the mental health hospital in Sioux Falls, South Dakota, known as Sioux Valley Hospital Behavioral Health Services in 2000. Sioux Valley Hospitals and Health System has never operated a mental health hospital in Sioux Falls or elsewhere.

3. In August 2000, Sioux Valley Hospital Behavioral Health Services was owned and operated by Sioux Valley Hospital, not by Sioux Valley Hospitals and Health System.

4. Sioux Valley Hospitals and Health System and Sioux Valley Hospital are separate corporations with their principal place of business in Sioux Falls, South Dakota. Sioux Valley Hospital is a non-profit corporation which has Sioux Valley Hospitals and Health System as its sole member.

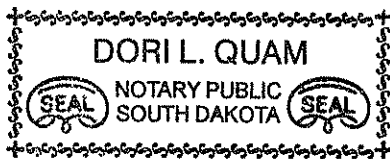
Further affiant saith not.


Dated at Sioux Falls, South Dakota, this 9th day of September, 2005.



Kim J. Patrick

Subscribed and sworn to before me this 9th day of September, 2005.





Notary Public, South Dakota
My commission expires: 2/4/2010