

IN THE MONTGOMERY COUNTY, OHIO, COURT OF COMMON PLEAS
CIVIL DIVISION

LARRY C. JAMES, <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	Case No. 2017 CV 00839
	:	
v.	:	
	:	
DAVID HOFFMAN, <i>et al.</i> ,	:	Judge Timothy N. O'Connell
	:	
Defendants.	:	

AFFIDAVIT OF
JOHN D. CORRIGAN

In Support Of

**PLAINTIFFS' CONSOLIDATED MEMORANDUM IN OPPOSITION TO
DEFENDANTS' MOTIONS TO DISMISS FOR LACK OF PERSONAL JURISDICTION
AND FORUM NON CONVENIENS**

IN THE MONTGOMERY COUNTY, OHIO, COURT OF COMMON PLEAS
CIVIL DIVISION

LARRY C. JAMES, et. al.,

Plaintiffs,

vs.

DAVID HOFFMAN, et. al.,

Defendants

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CASE NO: 2017 CV 00839

Judge Timothy N. O'Connell

AFFIDAVIT OF JOHN D. CORRIGAN

State of Ohio)
) ss:
County of Franklin)

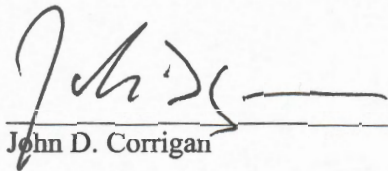
1. I, John Corrigan, having been first duly cautioned and sworn, state the following based upon personal knowledge:

2. I am a resident of and a licensed psychologist in Ohio, and an Emeritus Professor in the Department of Physical Medicine and Rehabilitation at the Ohio State University Wexner Medical Center.

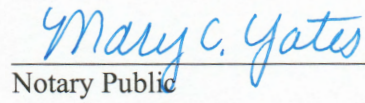
3. On July 10, 2015, I received an email post on the American Psychological Association (APA) Division 22 (Rehabilitation Psychology) listserv notifying me that the Report titled "Independent Review Relating to APA Ethics Guidelines, National Security Interrogations and Torture," was available online. The email post also provided a link to the APA response to the Report and the Report itself. I then accessed and read the Report from my home in Columbus, Ohio.

4. As I started reading the Report, I searched through it to see if I knew any of the people who were named in the Report. I had previously worked with Dr. Russ Newman and was particularly aware that the Report made reputation-damaging allegations against him. I also recall that the Division listserv discussion made mention that Dr. Stephen Behnke, the Director of Ethics at APA, might lose his job as a result of the Report.

FURTHER AFFIANT SAYETH NOT.


John D. Corrigan

Sworn and subscribed to before a notary public in the State of Ohio, this 28 day
of April 2017.


Notary Public



Mary C Yates
Notary Public Ohio
My Commission Expires
October 29, 2021