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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

ANDY NGO,

Plaintiff,

v.

ROSE CITY ANTIFA, an unincorporated
association; BENJAMIN BOLEN, an
individual; JOHN HACKER, an individual;
CORBYN (KATHERINE) BELYEA, an
individual; JOSEPH CHRISTIAN EVANS,
an individual; MADISON LEE ALLEN, an
individual; DOES 1-50,

Defendants.

Case No.: 20CV19618

**DECLARATION OF CAROLE A.
CALDWELL REGARDING
ALTERNATIVE SERVICE AS TO
DEFENDANT JOSEPH CHRISTIAN
EVANS**

I, Carole A. Caldwell, declare:

1. I am an employee of Murphy & Buchal, LLP, Counsel for plaintiff, Andy Ngo. I have personal knowledge of the facts stated herein and if called upon to testify as to the matters set forth in this Declaration, I could and would competently testify thereto.

2. This Declaration is filed pursuant to this Court’s Order of December 23, 2020.

3. On March 2, 2021, I caused true copies of the Summons and Complaint to be transmitted by Certified Mail to defendant Joseph Christian Evans at the address outlined in that Order as evidenced in Exhibit 1, attached hereto.

4. The Order also required that publication in the Oregonian with notice being publicized four (4) consecutive calendar weeks. The publication was accomplished as evidenced in

1 in Exhibit 2, attached hereto.

2 I declare under penalty of perjury under the laws of the State of Oregon that the foregoing is
3 true and correct.

4 Date: March 8, 2021

By: s/ Carole A. Caldwell
Carole A. Caldwell

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OFFICIAL USE

Certified Mail Fee	\$3.60
\$	\$0.00
Extra Services & Fees (check box, add fee, as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$ 0.00
<input type="checkbox"/> Return Receipt (electronic)	\$ 0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$ 0.00
<input type="checkbox"/> Adult Signature Required	\$ 0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$ 0.00

Postage \$1.40

\$5.00

Joseph Christian Evans
308 Woodpath Lane
Azalea, OR 97410



Postmark Here

03/02/2021

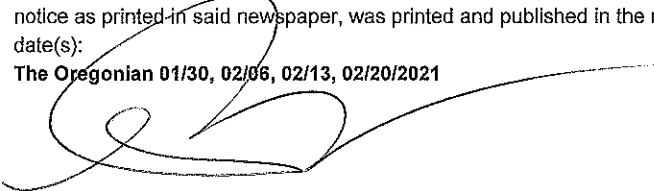
for Instructions

AD#: 0009865639

State of Oregon,) ss
County of Multnomah)

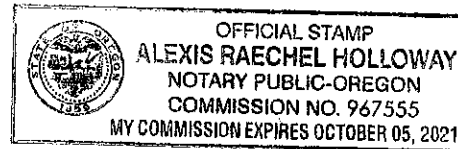
Brian Maly being duly sworn, deposes that he/she is principal clerk of Oregonian Media Group; that The Oregonian is a public newspaper published in the city of Portland, with general circulation in Oregon, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

The Oregonian 01/30, 02/06, 02/13, 02/20/2021


Principal Clerk of the Publisher

Sworn to and subscribed before me this 25th day of February 2021


Notary Public



IN THE CIRCUIT COURT OF OREGON FOR MULTNOMAH COUNTY
Case No.: 20CV19618 - SUMMONS

ANDY NGO, in his individual capacity, Plaintiff, vs.
ROSE CITY ANTIFA, an unincorporated association; BENJAMIN BOLEN, an individual; JOHN HACKER, an individual; CORBYN (KATHERINE) BELYEY, an individual; JOSEPH CHRISTIAN EVANS, an individual; MADISON LEE ALLEN, an individual; DOES 1-50, Defendants.

TO: JOSEPH CHRISTIAN EVANS and CORBYN (KATHERINE BELYEY)
YOU ARE HEREBY required to appear and defend the complaint filed against you in the above entitled action within thirty (30) days from the date of service of this summons upon you, and in case of your failure to do so, for want thereof, Plaintiff will apply to the court for the relief demanded in the complaint.

NOTICE TO THE DEFENDANT: READ THESE PAPERS CAREFULLY!

You must "appear" in this case or the other side will win automatically. To "appear" you must file with the court a legal paper called a "motion" or "answer." The "motion" or "answer" must be given to the court clerk or administrator within 30 days along with the required filing fee. It must be in proper form and have proof of service on the Plaintiff's attorney, or if the Plaintiff does not have an attorney, proof of service upon the Plaintiff. If you have any questions, you should see an attorney immediately. If you need help in finding an attorney, you may call the Oregon State Bar's Lawyer Referral Service at (503) 684-3763 or toll-free in Oregon at (800) 452-7636. Summary Statement of the Object of the Complaint: Plaintiff Andy Ngo claims Defendant Joseph Christian Evans was in the group of assailants who attacked Ngo. Evans was one of the first to strike Ngo, his actions inciting further violence against Ngo. Defendant Madison Lee Allen was among the group of assailants who attacked Ngo. Lee struck Ngo over the head with placard, while sporting green hair and a light, red-colored bandanna. Defendants Allen and Evans are upon information and belief, members of and/or affiliated with Rose City Antifa. The aforesaid incidents occurred in Portland, Oregon in May and June 2019. Defendant Allen's actions directly and proximately caused Ngo to sustain severe injuries. Defendant Evans's actions directly and proximately caused Ngo to sustain severe injuries. Demand for Relief: (A) Compensatory damages exceeding \$300,000, trebled to \$900,000 pursuant to ORS 166.725(7)(a), and in a precise amount to be determined at trial; (B) Attorneys' fees pursuant to ORS 166.725(14), and costs; (C) Pre-Judgment Interest; (D) Temporary, preliminary, and permanent injunctive relief prohibiting Defendants from harassing, threatening, harming, or attempt to do the same, to Ngo, and prohibiting Defendants from further engaging in acts in violation of ORS § 166.720, et seq.; and (E) All other relief as this court may deem just and proper. The Answer or responsive pleading must be given to the court clerk or administrator within 30 days of the date of first publication specified herein along with the required filing fee. The date of the first publication of the summons is/was January 30, 2021.

DATED: January 30, 2021.

MURPHY & BUCHAL, LLP, James L. Buchal, OSB #921618, 3425 S.E. Yamhill, Suite 100, Portland OR 97214, Counsel for Plaintiff Andy Ngo

CERTIFICATE OF SERVICE

I, Carole Caldwell, hereby declare under penalty of perjury under the laws of the State of Oregon that the following facts are true and correct:

I am a citizen of the United States, over the age of 18 years, and not a party to or interested in the within entitled cause. I am an employee of Murphy & Buchal LLP and my business address is 5353 SE Henderson Street, Portland, OR 97206

On March 8, 2021, I caused the following document to be served:

DECLARATION OF CAROLE A. CALDWELL REGARDING ALTERNATIVE SERVICE AS TO DEFENDANT JOSEPH CHRISTIAN EVANS

in the following manner on the parties listed below:

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/s/ Carole A. Caldwell