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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 MADISON LEE ALLEN**

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 Madison Lee Allen 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 Exhibit 2, attached hereto.

2 5. The Order also required the Summons and Complaint to be posted at the address  
3 outlined in that Order and was accomplished as evidenced in Exhibit 3, attached hereto.

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

6 Date: March 8, 2021

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

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U.S. Postal Service™  
**CERTIFIED MAIL® RECEIPT**

Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Boise, ID 83709

**OFFICIAL USE**

Certified Mail Fee	\$3.60
Extra Services & Fees (check box, add fee as appropriate)	\$0.00
<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

Madison Lee Allen  
12109 W Reutzell Drive  
Boise, ID 83709



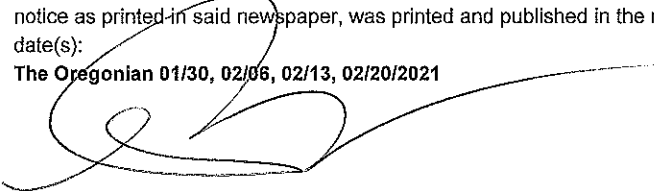
For Instructions

AD#: 0009865639

State of Oregon,) ss  
County of Multnomah)

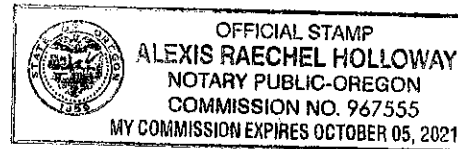
Brian Maly being duly sworn, deposes that he/she is principal clerk of Oregonian Media Group; that The Oregonian is a public newspaper published in the city of Portland, with general circulation in Oregon, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed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

CIRCUIT COURT OF THE STATE OF OREGON FOR MULTNOMAH COUNTY

ANDY NGO

Plaintiff/Petitioner

Cause No.: **20CV19618**

Hearing Date:

vs.

**ROSE CITY ANTIFA, AN UNINCORPORATED  
ASSOCIATION, ET AL.**

Defendant/Respondent

DECLARATION OF SERVICE OF:  
**SUMMONS; COMPLAINT; ORDER GRANTING PLAINTIFF'S MOTION  
FOR APPROVAL OF ALTERNATIVE MEANS FOR THE SERVICE OF  
PROCESS**

The undersigned hereby declares: That s(he) is now and at all times herein mentioned, a resident of the State of Idaho and over the age of eighteen, not an officer of a plaintiff corporation, not a party to nor interested in the above entitled action, has the authority to serve pleadings in the State named below, and is competent to be a witness therein.

**POSTING**

On the **4th day of March, 2021 at 3:13 PM**, this declarant posted the above listed documents directed to **MADISON LEE ALLEN** by then and there personally affixing **1** true and correct copy(ies) thereof in a conspicuous place on the property known as:  
**12109 W REUTZEL DR, BOISE, Ada County, ID 83709**

**3/3/2021 3:46 PM: Per PARENT; subject moved.**

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

Date: 03/04/2021

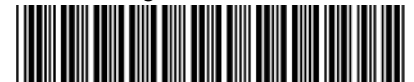


Service Fee Total: **\$170.00**

**Igancio Nick Salinas**  
**527 S Lancaster Dr, Nampa, ID 83686 208-602-0750**

ORIGINAL PROOF OF  
SERVICE

Tracking #: **0066060698** PDX



REF: **NGO 2271**



**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 MADISON LEE ALLEN**

in the following manner on the parties listed below:

Hilary Boyd, Esq.	( ) (BY FEDERAL EXPRESS)
Jonathan Henderson, Esq.	( ) (BY FIRST CLASS US MAIL)
Davis Rothwell Earle & Xóchihua, P.C.	(X) (BY E-MAIL)
200 SW Market Street, Suite 1800	( ) (BY FAX)
Portland, OR 97201	( ) (BY HAND)
Tel: 503-222-4422	
Fax: 503-222-4428	
<a href="mailto:hboyd@davisrothwell.com">hboyd@davisrothwell.com</a>	
<a href="mailto:jhenderson@davisrothwell.com">jhenderson@davisrothwell.com</a>	

David D. Park, Esq.	( ) (BY FEDERAL EXPRESS)
Elliott & Park, P.C.	( ) (BY FIRST CLASS US MAIL)
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Portland, OR 97239-8529	( ) (BY FAX)
Tel: 503- 227-1690	( ) (BY HAND)
<a href="mailto:dave@elliott-park.com">dave@elliott-park.com</a>	

Michelle R. Burrows, Esq.	( ) (BY FEDERAL EXPRESS)
Michelle R. Burrows, P.C.	( ) (BY FIRST CLASS US MAIL)
1333 Orenco Station Parkway# 525	(X) (BY E-MAIL)
Hillsboro, OR 97124	( ) (BY FAX)
Tel: 503-241-1955	( ) (BY HAND)
<a href="mailto:michelle.r.burrows@gmail.com">michelle.r.burrows@gmail.com</a>	

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6 [david@sugermanlawoffice.com](mailto:david@sugermanlawoffice.com)

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( ) (BY FAX)  
( ) (BY HAND)

5 Christopher A. Larsen, Esq.  
6 Pickett Dummigan McCall LLP  
7 210 SW Morrison St., 4th Fl.  
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9 Tel: 503-223-7770  
10 [chris@pdmlegal.com](mailto:chris@pdmlegal.com)

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(X) (BY FIRST CLASS US MAIL)  
( ) (BY E-MAIL)  
( ) (BY FAX)  
( ) (BY HAND)

9 Gabriel Chase  
10 Chase Law, P.C.  
11 621 S.W. Alder St., Ste. 600  
12 Portland, OR 97205  
13 Tel: 503-294-1414  
14 [gabriel@chaselawpc.net](mailto:gabriel@chaselawpc.net)

( ) (BY FEDERAL EXPRESS)  
(X) (BY FIRST CLASS US MAIL)  
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/s/ Carole A. Caldwell