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

ANDY NGO, an individual,)
)
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 DAVID D. PARK IN SUPPORT OF DEFENDANT JOHN HACKER’S OPPOSITION TO MOTION TO AMEND COMPLAINT

I, David D. Park, declare:

- I am one of the attorneys for defendant John Hacker in the above-captioned proceedings and I make this declaration upon personal knowledge of the facts set forth herein.
- Plaintiff’s counsel’s UTCR 5.010 Certificate states:

Plaintiff certifies pursuant to UTCR 5.010 that he has provided a copy of this motion, including the proposed First Amended Complaint, to counsel for all parties in this case and mailed a copy to the last known address of

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unrepresented defendants, followed up by telephone calls to counsel.
[No party objects to the motion.]

Contrary to the certification of plaintiff’s counsel, neither I nor any of my co-counsel for defendant Hacker received a telephone call or voice message from Mr. Buchal or any other counsel for plaintiff seeking conferral on plaintiff’s motion. Neither I nor any other defense counsel for Mr. Hacker conferred with plaintiff’s counsel concerning the motion.

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.

Dated this 6th day of August, 2021.

s/ David D. Park

David D. Park, OSB #803358
Of Attorneys for Defendant Hacker

1 CERTIFICATE OF SERVICE

2 I hereby certify that on the 6th day of August, 2021, I served a copy of the foregoing

3 **DECLARATION OF DAVID D. PARK IN SUPPORT OF DEFENDANT JOHN HACKER'S**
4 **OPPOSITION TO MOTION TO AMEND COMPLAINT** on the following:

5 James L. Buchal
6 Murphy & Buchal LLP
7 P.O. Box 86620
8 Portland, OR 97286
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19 Davis Rothwell Earle & Xochihua, P.C.
20 200 SW Market Street, Suite 1800
21 Portland, OR 97201
22 Attorneys for Defendant Bolen

23 I further certify that said copies were:

24 _____ Mailed in a sealed envelope, via US Postal Service

25 XX Transmitted via courtesy e-mail

26 XX Transmitted via OJD E-filing System (File & Serve)

_____ Hand Delivered

27 DATED this 6th day of August, 2021.

28 ELLIOTT & PARK, P.C.

29 s/ David D. Park

30 _____
31 David D. Park, OSB #803358
32 Of Attorneys for Defendant John Hacker
33 E-mail: dave@elliott-park.com