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

MASON LAKE,

Plaintiff,

v.

CITY OF PORTLAND,

Defendant.

Case No. 20CV19838

DEFENDANT’S REPLY TO PLAINTIFF’S  
REPOSE TO DEFENDANT’S MOTION TO  
COMPEL PRODUCTION OF DOCUMENTS

Defendant City of Portland replies briefly as follows to Plaintiff’s Response:

- **Requests Number 8 and 9:** Defendant has not received any documents responsive to this request. In handling other cases arising out of the George Floyd protests, Defendant found a police report dated 7/23/2020, which describes Plaintiff sustaining injuries during a protest from an assault by a fellow protestor. Plaintiff was interviewed by a police officer at the hospital, and it was reported there was video of the assault. Additional information about this event is discoverable due to its proximity in time. Medical records relating to this incident are discoverable as they may or may not reference the previous injury.

DATED: April 5, 2021.

Respectfully submitted,

*/s/ Caroline Turco*

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Caroline Turco, OSB No. 083813  
Deputy City Attorney  
Email: [caroline.turco@portlandoregon.gov](mailto:caroline.turco@portlandoregon.gov)  
*Of Attorneys for Defendant City of Portland*

1 **CERTIFICATE OF SERVICE**

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3 I hereby certify that I served the foregoing DEFENDANT’S REPLY TO PLAINTIFF’S  
4 RESPONSE TO DEFENDANT’S MOTION TO COMPEL PRODUCTION OF DOCUMENTS  
5 on the following parties by the method indicated:

<p>6 Michael Fuller 7 Underdog Lawyer 8 US Bancorp Tower 9 111 SW Fifth Ave., Suite3150 10 Portland, OR 97204</p> <p>11 Kelly Donovan Jones 12 Law Office of Kelly D. Jones 13 819 SE Morrison Street, Suite 255 14 Portland, OR 97214 15 <i>Of Attorneys for Plaintiff</i></p>	<p><input type="checkbox"/> <b>Electronic service</b> - UTCR 21.100 (1)(a)</p> <p><input type="checkbox"/> <b>Mail</b> in a sealed envelope, with postage paid, and deposited with the U.S. Postal Service.</p> <p><input type="checkbox"/> <b>Hand delivery</b>    <input type="checkbox"/> <b>Facsimile transmission</b></p> <p><input checked="" type="checkbox"/> Courtesy copy via <b>Email</b></p>
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13 Dated: April 5, 2021

16 /s/ Caroline Turco  
 17 CAROLINE TURCO, OSB #083813  
 18 Deputy City Attorney  
 19 Email: caroline.turco@portlandoregon.gov  
 20 Fax: (503) 823-3089  
 21 Of Attorneys for Defendant City of Portland