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Attorneys for Plaintiff John Doe

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

JOHN DOE,

Plaintiff,

v.

UNIVERSITY OF OREGON; SANDY WEINTRAUB, an individual acting in his personal capacity; **CAROL MILLIE**, an individual acting in her personal capacity; and **ROBIN HOLMES**, an individual acting in her personal capacity.

Defendants.

CASE NO.: 6:17-cv-01103-AA

DECLARATION OF DOUGLAS STAMM IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANTS' MOTION TO DISMISS

I, Douglas Stamm, declare:

1. I am an associate attorney at Janet Hoffman & Associates, LLC, attorneys for Plaintiff

John Doe.

2. I make this declaration based on personal knowledge and in support of Plaintiff John

Doe's Opposition to Defendants' Motion to Dismiss.

3. On September 15, 2016, counsel for John Doe submitted for filing in Lane County Circuit Court a combined complaint and petition for writ of review. Attached as Exhibit A is a true and correct copy of the complaint and petition for writ of review submitted to the circuit court.
4. On September 16, 2016, the circuit court rejected John Doe's combined complaint and petition for review. The circuit court sent to counsel by email a Rejected Filing Notification, stating that the Complaint and Petition for Writ of Review had to be filed separately. Attached as Exhibit B is a true and correct copy of the Rejected Filing Notification.
5. The clerk of the circuit court contacted our firm by telephone and requested that counsel for John Doe return the call.
6. I contacted the clerk of court, who confirmed that a petition for writ of review had to be filed separately from a civil complaint.
7. Counsel for John Doe therefore filed on September 16, 2016, a revised pleading that included only the petition for writ of review without any civil claims for damages.

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

Respectfully submitted this 23rd day of October, 2017.

/s/ Douglas Stamm

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