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Of Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

GREGG SCHUMACHER and LINDA)	
SCHUMACHER, individually and as)	No.
husband and wife, and GREGG)	
SCHUMACHER FURS LLC dba)	PLAINTIFFS' MOTION FOR
SCHUMACHER FURS & OUTERWEAR,)	PRELIMINARY INJUNCTION
)	AND WAIVER OF SECURITY
Plaintiffs)	UNDER FRCP 65
)	
v.)	Oral Argument Requested
)	
CITY OF PORTLAND, a municipal)	
corporation; IN DEFENSE OF ANIMALS,)	
a foreign nonprofit corporation; ANIMAL)	
LIBERATION FRONT, an unincorporated)	
association; PEOPLE FOR THE ETHICAL)	
TREATMENT OF ANIMALS, INC., a)	
foreign nonprofit corporation; MATT)	
ROSSELL; KEVIN MEIRAS, aka "Bluejay";)	
CONNIE DURKEE; ALEX LILLI; JOHN)	
DOES 1-10; and JANE DOES 1-10)	
)	
Defendants.)	

COMPLIANCE WITH LR 7.1(A) (1)

Counsel for plaintiffs certify they are unable to make a good faith effort to confer about the issues raised in this motion due to extenuating circumstances, including: (1) the extensive history of acrimonious relationships among plaintiffs and the protestor defendants; (2) the lack of information about counsel or other authorized representatives for the protestor defendants against whom the motion is directed; (3) limited information concerning the identities, whereabouts and affiliations of some protestor defendants; and (4) the significant numbers of protestor defendants.

FIRST MOTION

Plaintiffs respectfully move the court to issue a preliminary injunction pursuant to FRCP 65 governing the conduct of defendants PETA, IDA, ALF, ROSSELL, MEIRAS, DURKEE and LILLI, and any of their associates, affiliates or anyone else acting at their direction, in concert with them, or otherwise similarly situated by interest or objective with them, as follows:

a) Imposing reasonable time, place and manner restrictions on the size, duration, noise level and other conditions of protests and demonstrations at or near plaintiffs' store at 811 SW Morrison Street, Portland, Oregon, including but not limited to conditions relating to size, placement and number of signs, spacing of protestors and demonstrators to allow flow of pedestrian and vehicular traffic on the public streets and sidewalks at or near plaintiffs' business premises, the use of amplification without obtaining required city or county permits, distribution of leaflets or other literature, and following or approaching any member of the public approaching or leaving the vicinity of plaintiffs' business premises;

b) Prohibiting defendants from entering closer than five (5) feet to, or posting or writing any message on, any portion of plaintiffs' business premises;

c) Prohibiting defendants from blocking the entry to plaintiffs' business premises at any time during business hours;

d) Prohibiting defendants from placing, posting or dispersing any signs, solid or liquid substances on or around plaintiffs' business premises or the adjoining streets or sidewalks;

e) Prohibiting defendants from approaching plaintiffs GREGG SCHUMACHER, LINDA SCHUMACHER, or employees or customers of SFO closer than 100 feet, and further prohibiting them from following GREGG SCHUMACHER, LINDA SCHUMACHER or employees or customers of SFO as they approach or leave the business premises; and

f) Prohibiting defendants from entering or remaining upon residential property of GREGG SCHUMACHER, LINDA SCHUMACHER, or their employees or family members, or from engaging in oral or written communications with them, including any protest or demonstration activity, within 200 feet of their residential property;

g) Prohibiting defendants from creating, issuing, transmitting or disseminating any form of threat of death or serious bodily injury concerning GREGG SCHUMACHER, LINDA SCHUMACHER, employees or customers of SFO, or any family members of those persons, whether orally or in written or electronic form; and

h) Prohibiting defendants from using, appropriating or in any way interfering with the schumacherfurs.com domain name, including derivations thereof, for defendants' own use or purposes; and

i) Prohibiting defendants from contacting or communicating in any way with current or prospective owners, sellers, lessors, property managers, brokers or others who are or may be involved in negotiations with plaintiffs for acquisition or leasing of space for plaintiffs' business operations, including but not limited to efforts to discourage or interfere with such negotiations.

SECOND MOTION

Plaintiff further requests the court to waive the requirement of FRCP 65(c) that plaintiffs give security because no damages will accrue to any of the defendants by reason of granting this motion.

This motion is based on FRCP 65, plaintiffs' complaint on file herein, and plaintiffs' contemporaneous brief and declarations.

DATED this 20th day of April, 2007.



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