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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

GREGG SCHUMACHER and LINDA)	
SCHUMACHER, individually and as)	CV No. CV-07-601-HU
husband and wife, and GREGG)	
SCHUMACHER FURS LLC dba)	
SCHUMACHER FURS &)	MOTION TO CONSOLIDATE
OUTERWEAR,)	PRELIMINARY INJUNCTION
)	HEARING WITH HEARING
)	ON DEFENDANT'S SPECIAL
)	MOTION TO STRIKE (anti-
)	SLAPP)

v.

CITY OF PORTLAND, a municipal)	On behalf of defendants In
corporation; IN DEFENSE OF ANIMALS,)	Defense of Animals, Rossell,
a foreign nonprofit corporation; ANIMAL)	Durkee, and Mieras
LIBERATION FRONT, an unincorporated)	
association; PEOPLE FOR THE ETHICAL)	

TREATMENT OF ANIMALS, INC., a)
 foreign nonprofit corporation; MATT)
 ROSSELL; KEVIN MIERAS aka "Bluejay";)
 CONNIE DURKEE; ALEX LILLI; JOHN)
 DOES 1-10; and JANE DOES 1-10)
)
 Defendants.)

LR 7.1 CERTIFICATION

The undersigned counsel of record for defendants hereby affirms the party made a good faith effort for a telephone conference on May 11, 2007 between the undersigning counsel for plaintiffs to resolve the disputes raised by this motion and have been unable to do so. Plaintiffs counsel did, however, indicate that if the motions were consolidated defense counsel would be prepared to argue both next week.

MOTION

Defendant's In Defense of Animals, Rossell, Durkee, and Meiras move the Court to consolidate the hearing on defendant's special motion to strike with the hearing on plaintiff's motion for preliminary injunction. Both motions involve a determination of whether or not plaintiffs have a likelihood of success on the merits.

DATED: May 11, 2007

By *Jam Pannell*
 Jam Pannell OSB # 06429
 Shauna Curphey, OSB # 06306
 Attorney for defendant MIERAS

By *Mark McDougal*
 Mark McDougal, OSB # 89086
 Natalie McDougal, OSB #04250
 Gregory Kafoury, OSB # 74166
 Attorneys for defendants IDA,
 ROSSELL, and DURKEE

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing Motion to Consolidate on the following person(s) on the date indicated below, by the following method:

[X] by electronically mailed notice from the court on the date set forth below;

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Attorney for Plaintiffs

DATED: May 11, 2007


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Mark G. McDougall, OSB #89086
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