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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

GREGG SCHUMACHER and LINDA)	
SCHUMACHER, individually and as)	
husband and wife, and GREGG)	No. CV 07 601 HU
SCHUMACHER FURS LLC dba)	
SCHUMACHER FURS & OUTERWEAR,)	MOTION TO MAKE MORE
)	DEFINITE AND CERTAIN
Plaintiffs,)	
)	
v.)	
)	
CITY OF PORTLAND, a municipal)	
corporation; IN DEFENSE OF ANIMALS,)	ON BEHALF OF DEFENDANTS
a foreign nonprofit corporation; ANIMAL)	IN DEFENSE OF ANIMALS,
LIBERATION FRONT, an unincorporated)	MATT ROSSELL, CONNIE
association; PEOPLE FOR THE ETHICAL)	DURKEE & KEVIN MIERAS

TREATMENT OF ANIMALS, INC., a)	
foreign nonprofit corporation; MATT)	
ROSSELL; KEVIN MEIRAS aka "Bluejay";))	Oral Argument Requested
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 that the parties made a good-faith effort through a telephone conference on May 11, 2007, between the undersigned and counsel for plaintiffs to resolve the disputes raised by this Motion and have been unable to do so.

ISSUES TO BE DECIDED

1. Whether plaintiffs' claims against the defendants (other than the City of Portland) are so vague or ambiguous that the particular defendants cannot reasonably be required to frame a responsive pleading.

2. Whether plaintiffs should be required to provide a plain and concise statement of the particular conduct engaged in by each particular defendant that gives rise to each of plaintiffs' claims against each particular defendant.

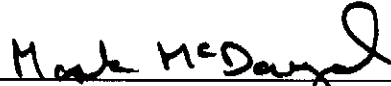
MOTION

Pursuant to F.R.C.P. § 12(e), defendants move to require plaintiffs to make a more definite statement of their claims against each particular defendant (other than the City). The current complaint does not state the particular conduct of moving defendants that form the basis of the state law claims against each defendant. Plaintiffs should be required to specify the conduct of each defendant that gives rise to each of the plaintiffs' state law claims against each particular defendant. This Motion is based on the accompanying Memorandum in Support of Motion to Make More Definite and Certain, and the plaintiffs' Complaint.

DATED May 11, 2007.

Respectfully submitted,

KAFOURY & MCDUGAL



Mark G. McDougal, OSB #89086

Attorneys for Defendants

In Defense of Animals, Matt Rossell

and Connie Durkee



Jami Pannell, OSB #06429

Shauna Curphey, OSB #06306

Attorneys for Defendant Kevin Mieras

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the foregoing Motion to Make More Definite and Certain 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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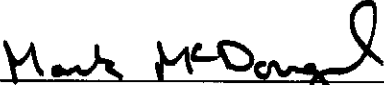
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DATED: May 11, 2007


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