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Attorneys for Defendant Kevin Mieras

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

GREGG SCHUMACHER and LINDA  
SCHUMACHER, individually and as  
husband and wife, and GREGG  
SCHUMACHER FURS LLC dba  
SCHUMACHER FURS & OUTERWEAR,

Case No. CV 07 601 HU

Plaintiffs,

AFFIDAVIT OF KEVIN MIERAS

v.

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 MIERAS aka "Bluejay";  
CONNIE DURKEE; ALEX LILLI; JOHN  
DOES 1-10; and JANE DOES 1-10,

Defendants.

AFFIDAVIT OF KEVIN MIERAS

State of Oregon            )  
  ) ss:  
County of ~~Washington~~

I, Kevin Mieras, being duly sworn and under penalty of perjury, depose and state:

1. I make this affidavit based upon my personal knowledge.
2. I am a named defendant in this lawsuit. I am not a member of any of the animal rights groups named as defendants in this lawsuit.
3. Beginning in mid-February 2006 (three months after the protests began), I have on a regular basis gone to the area around the Schumacher Furs store in downtown Portland in order to educate the community about issues relating to the fur industry. I attended the protests because I believe the use of fur for fashion is immoral and unnecessary. I have researched this issue over the years and have learned that animals raised for fur are often anally electrocuted and skinned alive, among other atrocities.
4. I have never had control over the other individuals who expressed their viewpoints in front of the Schumacher Furs store, nor have I issued any orders or directives to these individuals.
5. I never received any orders or directives from any of the other individuals who attended the Schumacher protests.
6. I never concealed my identity. I have always been open with Gregg and Linda Schumacher as to my true name.
7. I have never entered the Schumachers' retail store.

8. I have occasionally written in chalk on the public sidewalk adjacent to the Schumacher Furs store. With the chalk, I wrote things such as "shop cruelty free" or noted fur industry statistics, such as the average number of animal skins that are required to produce one fur coat. Before I wrote on the sidewalk with chalk, I asked a City of Portland police officer whether that was permissible, and learned that it was.

9. I have checked with the police to make sure that activities that I have been engaged in were not in violation of any ordinances.

10. I have never directed an oral or written threat of death or injury to the Schumachers or any of their children, employees, customers, or any member of the public. Nor have I ever threatened to burn anyone's residence.

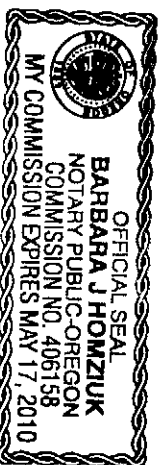
11. I have never thrown or dispersed fecal matter, urine, or red paint on or around the building and adjoining sidewalks of the Schumacher store. I have never engaged in nudity in connection with activities involving Schumacher Furs.

12. I have never gone to the residence of the Schumachers or any of their employees or family members, nor do I know where any of them reside.

13. I have never been a member or affiliate of the Animal Liberation Front, nor have I ever taken any action on its behalf.

DATED 5/11/07 Kevin Mieras  
KEVIN MIERAS

SUBSCRIBED AND SWORN TO before me this 11<sup>th</sup> day of May, 2007, in  
Portland, Oregon.



Barbara J Homziuk  
Notary Public in and for the State of Oregon  
My Commission Expires: May 17, 2010

**CERTIFICATE OF SERVICE**

I hereby certify that I served a true copy of the foregoing AFFIDAVIT OF KEVIN MIERAS 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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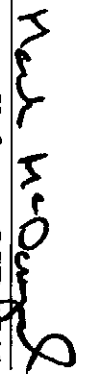
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DATED: May 11, 2007

  
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