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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)
husband and wife, and GREGG)
SCHUMACHER FURS LLC dba)
SCHUMACHER FURS & OUTERWEAR,)
Plaintiffs)

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 MEIRAS aka "Bluejay";)
CONNIE DURKEE; ALEX LILLI; JOHN)
DOES 1-10; and JANE DOES 1-10)
Defendants.)

No. CV 07-601-HU

**SUPPLEMENTAL
DECLARATION OF GREGG
SCHUMACHER IN SUPPORT
OF PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

I, GREGG SCHUMACHER, under penalty of perjury, do declare the following:

1. I am one of the plaintiffs in this case. Since the filing of this lawsuit and our motion for a preliminary injunction, the protests have continued outside Schumacher Furs and Outerwear (SFO). Some protestors show up on weekdays, and a larger group of them continue to come during the weekends, especially Saturday afternoons;
2. Other acts of vandalism and harassment have also continued. Before we filed the lawsuit, glue was repeatedly put into the locks of the security doors at SFO when we were not open for business, and on one occasion feces were inserted in the locks. Since the filing of the lawsuit, I have discovered a glue-like substance was inserted into the rear door lock of my car. To this day, it is our practice to look under our cars before trying to start them to make certain they have not been tampered with. *See Exhibit 3 to Gregg Schumacher Declaration in Support of Preliminary Injunction.* Since the filing of the lawsuit, I have continued to experience verbal taunting by Kevin Mieras on a number of occasions as I was leaving work to go home, and we have continued to receive a number of “crank calls” from people who did not identify themselves, some laced with profanity and some saying “We’re glad you’re closing”;
3. As to the involvement of PETA, I recall the TV on the sidewalk during weekend protests has been playing a PETA video, and I have a recollection that some of the bare-breasted female protestors have covered their nipples with stickers bearing PETA identification. I further recall occasions when people placed or carried PETA signs on the sidewalk who were part of larger groups of protestors blocking the sidewalk and sometimes the doorway of our store, including the November 2006 “Fur Free Friday” protest involving over 200 people, all in addition to finding PETA literature inserted in the pockets of our merchandise, as noted in my earlier declaration;

4. Although SFO leave its current store location May 31, 2007, we are still pursuing alternate locations for SFO, including enlisting the continuing assistance of commercial realtors. We want to be able to continue operating SFO and hope to be able to do so in the near future if we can find a location;
5. For those who question why it took so long for us to bring this lawsuit, I would point out (without any intention of waiving attorney-client or other privileges) that I spent over a year diligently trying to secure the services of legal counsel with both the willingness and the professional background to handle a case of this magnitude. That search was not limited to Portland, but also included a national search. I did not locate such counsel until I retained my current attorneys in late January, 2007;
6. My wife and I had made plans almost a year ago to be out of town this month, which unfortunately includes the day the hearing was scheduled. Although we considered at length changing our plans with some difficulty and expense, my wife Linda Schumacher's doctor and counselor have advised us her personal health requires we take the trip as scheduled to separate ourselves from the protest situation. Speaking for myself, I also need a break from the protest situation due to difficulty sleeping and the stress of always being on edge from repeated contact with protestors over the past 18 months.

DATED this 12 day of May, 2007.



Gregg Schumacher