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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,)	CV-07-00601-MO
)	
Plaintiffs,)	
)	DEFENDANT KEVIN MIERAS'
v.)	MOTION FOR RECONSIDERATION
)	OF INJUNCTIVE ORDER DATED
CITY OF PORTLAND, a municipal)	MAY 22, 2007
corporation; IN DEFENSE OF ANIMALS,)	
a foreign nonprofit corporation; ANIMAL)	
LIBERATION FRONT, an unincorporated)	Oral Argument Requested
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

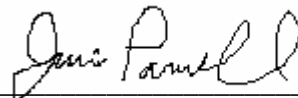
The undersigned counsel of record for defendant Kevin Mieras hereby affirm the party made a good faith effort for a telephone conference on May 24-25, 2007, between the undersigned counsel and counsel for plaintiffs to resolve the disputes raised by this motion and have been unable to do so.

MOTION

Defendant Kevin Mieras ("Mr. Mieras") respectfully moves the Court to reconsider its Order as to the enjoined conduct of Mr. Mieras, pursuant to FRCP 60, and to vacate the Order in its entirety based upon its manifest injustice, its overly broad restriction of Mr. Mieras' First Amendment right to free speech, its vague and ambiguous language and restrictions, its findings on the likelihood of success of plaintiffs' Intentional Infliction of Emotional Distress ("IIED") claim, or any other claim against Mr. Mieras, its findings that the plaintiffs have met their burden of showing irreparable injury, its findings that there exist sufficient factual evidence supporting the preliminary injunction imposed upon Mr. Mieras, and finally, because the balance of hardships tips strongly in Mr. Mieras' favor.

Defendant Mieras is filing this motion within 60 days of the earliest date on which the Court issued the Order. This Motion is based on the accompanying Memorandum in Support, and on the records, files, and pleadings in this case.

DATED: May 25, 2007



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