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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

**DECLARATION OF DANNY
GARNER IN SUPPORT OF
PLAINTIFFS' RESPONSE
TO DEFENDANT MEIRAS'
MOTION FOR
RECONSIDERATION**

I, DANNY GARNER, under penalty of perjury, do declare the following:

I. INTRODUCTION

1. I was an eyewitness to the protest gatherings at Schumacher Furs and Outerwear (SFO) on May 19, 2007 and May 26, 2007. I am personally familiar with the facts recounted herein.
2. On May 19, 2007, I arrived at SFO before 12:30 pm. In talking with SFO employees, I observed that they seemed mentally and physically worn down by the protests.
3. At approximately 1:30 pm, protester and defendant Kevin Meiras arrived. A Portland Police unit was located across the street at this time with a uniformed Portland Police officer in the driver's seat and someone in street clothes in the passenger seat. Meiras spent some time setting up medium size folding tables on top of pallets. He then displayed numerous food and beverage items on the tables.
4. Just after 2:00 pm, Scott Castleman and I approached the uniformed police officer and he asked whether Meiras was at the protest. I identified him. The officer also asked what had happened in Court when the Plaintiffs' Motion for Preliminary Injunction was heard. The other security officer and I informed the officer of our understanding of the Court's ruling, including that Meiras had been ordered by the Judge to stay fifteen feet from the store. The officer asked for something in writing which I did not have on hand to provide to him.
5. Between 2:30 and 3:00 Meiras was videotaping people in a much more aggressive manner than usual. On numerous occasions he stood approximately five feet from the entrance of the store videotaping SFO customers and employees. He also stood to the side of the store, approximately two to three feet from the property to obtain video/still footage.

6. On May 26, 2007, Meiras came to SFO again. He brought approximately five signs and placed them on the ground near where they are typically displayed.
7. During the protest, I contacted a Portland police officer to report that Meiras was violating the injunction by directing communication to an SFO employee. An officer responded and informed me that a report would be made. After the officer left, the store was closed and I escorted employees to their vehicles. The protesters remained on location.

DATED this 7th day of June, 2007.

Danny Garner
Danny Garner