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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-MO

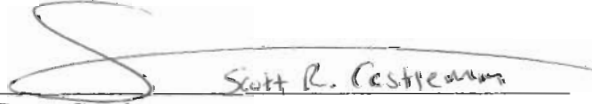
**DECLARATION OF SCOTT
CASTLEMAN IN SUPPORT
OF PLAINTIFFS' RESPONSE
TO DEFENDANT MEIRAS'
MOTION FOR
RECONSIDERATION**

I, SCOTT CASTLEMAN, under penalty of perjury, do declare the following:

I. INTRODUCTION

1. I am the security consultant for Gregg and Linda Schumacher and Schumacher Furs. I have been present at a majority of the Saturday protest gatherings and have had a significant amount of contact with Kevin Meiras.
2. During many of those occasions I have spoken with Mr. Meiras about the website portlandfurcruelty.com. We discuss it as his website. He makes no effort to hide that he designed and authors most of the content at portlandfurcruelty.com. On many occasions I have referred to the website as his website. He has never denied owning and operating the website or denied authoring most of its content. On one occasion I asked why he had temporarily shut down his website. His response confirmed that it was in fact he who had shut down the website.
3. I have also visited portlandfurcruelty.com. The video footage displayed there is video footage I have observed Meiras obtaining at the protest gatherings. On the video I can identify his voice and see his reflection in the window of Schumacher Furs and Outerwear.

DATED this 7th day of June, 2007.


Scott Castleman