

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON

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

CV No. 07-CV-00601-MO

DECLARATION OF JEFFREY M. BATCHELOR

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.

I, Jeffrey M. Batchelor, declare and testify as follows:

1. The statements contained herein are made upon my personal knowledge. If called upon to do so, I could and would competently testify as set forth herein.

PAGE 1 - DECLARATION OF JEFFREY M. BATCHELOR

2. I am a shareholder in the law firm of Markowitz, Herbold, Glade & Mehlhaf, PC, a Portland, Oregon, specialty civil litigation firm. I have practiced law in Oregon since 1972; I have worked as a mediator in Oregon since 1995, and as an arbitrator since 1989. I have also served as a special master in federal court and as a discovery referee in state court. I am listed in *Oregon Super Lawyers* for Appellate Law and in *The Best Lawyers in America* for Appellate Law and Alternative Dispute Resolution.

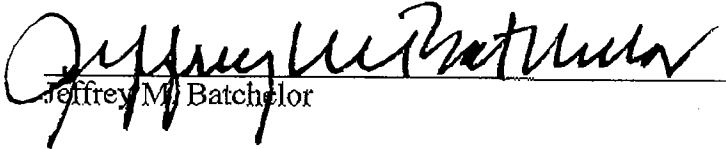
3. I am personally familiar with the billing practices and rates of law firms in Portland.

4. I am also personally familiar with the reputation of Lane Powell PC in the Portland community, as well as with the reputation of many of its attorneys, including David G. Hosenpud.

5. The hourly rate of \$355.00 for Mr. Hosenpud is commensurate with Mr. Hosenpud's skill, reputation, and experience, and is consistent with the billing rates of other attorneys of similar stature in the Portland area.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 9th day of August 2007, at Portland, Oregon.


Jeffrey M. Batchelor