

TRACY POOL REEVE, OSB #89112
Senior Deputy City Attorney
treeve@ci.portland.or.us
Office of City Attorney
1221 SW Fourth Avenue, Room 430
Portland, OR 97204
Telephone: (503) 823-4047
Facsimile: (503) 823-3089
Of Attorneys for Defendant City of Portland

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON**

BRIAN P. CARR,

Civil No. 08-398-HA

PLAINTIFF,

v.

AFFIDAVIT OF TRACY POOL REEVE

State of Oregon, through **Hardy Myers** in his official capacity as Attorney General of the State of Oregon and the **City of Portland** through **Linda Meng** in her official capacity as City Attorney for the City of Portland,

(In Support of Defendants' Motion for Extension of Time for Completion of Discovery, Filing Dispositive Motions and Lodging Pretrial Order)

DEFENDANTS.

STATE OF OREGON)
) ss.
County of Multnomah)

I, Tracy Pool Reeve, being first duly sworn, do depose and say:

1. I am the attorney assigned to represent defendant City of Portland in the above-entitled matter.

2. I have prepared this affidavit in support of Defendants' Motion for Extension of Time for Completion of Discovery, Filing Dispositive Motions and Lodging Pretrial Order.

3. On March 31, 2008, this Court issued Civil Minutes setting the discovery deadline and the date for filing dispositive motions to July 29, 2008, and the Pretrial Order deadline to August 28, 2008.

4. On June 3, 2008, defendants City of Portland and the State of Oregon filed Motions to Dismiss. These motions are currently under submission before the Court.

5. Defendants request an order:

(a) Allowing a sixty-day extension of time from the issuance of the Court's ruling on the Motions to Dismiss to complete discovery; file dispositive motions, file all pleadings; join all claims, remedies and parties; and

(b) Allowing a ninety-day extension of time from the issuance of the Court's ruling on the Motions to Dismiss to lodge the Pretrial Order.

6. Pro Se Plaintiff, Brian Carr, and the State's attorney, Assistant Attorney General Joseph G. Groshong, consent to and join in defendants' request for extension of time.

7. This motion is presented in good faith and not for reasons of delay.

/s/ Tracy Pool Reeve
TRACY POOL REEVE

SUBSCRIBED AND SWORN TO before me this 29th day of July, 2008, by
Tracy Pool Reeve.

/s/ Lisa G. Miller
Notary Public For Oregon
My commission expires: April 10, 2011
Commission No. 415340

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing AFFIDAVIT OF TRACY POOL REEVE on:

BRIAN CARR
11301 NE 7TH ST., APT. J5
VANCOUVER, WA 98684
E-Mail: brian@brian.carr.name
Pro Se Plaintiff

JOSEPH G. GROSHONG
ASSISTANT ATTORNEY GENERAL
DEPARTMENT OF JUSTICE
TRIAL DIVISION
1162 COURT STREET NE
SALEM, OR 97301-4096
Of Attorneys for Defendant State of Oregon

on July 29, 2008, by causing a full, true and correct copy thereof, addressed to the last-known address (or fax number) of said *pro se* plaintiff and said attorney, to be sent by the following method(s):

- by **mail** in a sealed envelope, with postage paid, and deposited with the U.S. Postal Service in Portland, Oregon.
- by **hand-delivery**.
- by **email** pursuant to LR 5.2(b) and/or in accordance with the Court's April 29, 2008, order (docket No. 10).
- by **facsimile transmission**.

/s/ Tracy Pool Reeve
TRACY POOL REEVE, OSB #89112
Telephone: (503) 823-4047
Senior Deputy City Attorney
Of Attorneys for Defendant City of Portland