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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

**MATS JARLSTROM**, an individual,

Plaintiff,

v.

**CITY OF BEAVERTON**, an Oregon municipal  
corporation,

Defendant.

Case No.: 3:14-cv-00783-AC

**DECLARATION OF MICHAEL E.  
HAGLUND**

I, Michael E. Haglund, being sworn, say:

1. I am lead counsel for plaintiff in this case and make this declaration based on my personal knowledge.

2. Mr. Jarlstrom's Memorandum in Opposition to Defendant's Motion to Dismiss was filed in good faith and based on the belief that, along with the permissible declaration of Mats Jarlstrom, Mr. Jarlstrom's original Complaint contained allegations sufficient to defeat the City's motion to dismiss.

**PAGE 1 – DECLARATION OF MICHAEL E.  
HAGLUND**

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3. In an abundance of caution, Mr. Jarlstrom filed his Motion for Leave to File First Amended Complaint in order to narrow and strengthen his allegations, as well as provide additional facts to the Court, should this Court disagree with his positions in his opposition to the City's motion to dismiss. Plaintiff's Motion for Leave to File a First Amended Complaint was also filed in good faith.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

DATED this 4th day of August, 2014.



Michael E. Haglund

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of August, 2014, I served the foregoing

**DECLARATION OF MICHAEL E. HAGLUND**, on the following:

Gerald L. Warren  
Law office of Gerald Warren  
901 Capitol Street, NE  
Salem OR 97301  
Attorney for Defendant

by the following indicated method(s):

- by **mail** with the United States Post Office at Portland, Oregon in a sealed first-class postage prepaid envelope.
- by **email**.
- by **hand delivery**.
- by overnight mail.
- by **facsimile**.
- by the court's Cm/ECF system.

/s/ Michael E. Haglund  
Michael E. Haglund, OSB No. 772030