

**HART
WAGNER**^{LLP}
TRIAL ATTORNEYS

Taylor B. Lewis

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March 16, 2018

Via Email and U.S. Mail

Michael Fuller
Olsen Daines, P.C.
US Bancorp Tower
111 SW Fifth Ave., Suite 3150
Portland, OR 97204

Ron K. Cheng
Pickett, Dummigan, McCall, LLP
210 SW Morrison Street, 4th Floor
Portland, OR 97204

Re: *Areli Lopez v. C&R Real Estate Services, Co. and Rod Monroe and C&R
Real Estate Services, Co. and Rod Monroe v. Jose Ramirez*
Multnomah Co. Circuit Court Case No. 17CV32857
Our File No. 28333

Dear Michael and Ron:

Enclosed please find two proposed subpoenas to Portland Tenants United; one for Areli Lopez and the other for Jose Ramirez.

Absent objection, we will serve these subpoenas on or after March 26, 2018. Please let me know if you are willing to waive the statutory notice requirement.

Sincerely,



Taylor B. Lewis

eao
Enclosures

IN THE CIRCUIT COURT OF THE STATE OF OREGON

FOR THE COUNTY OF MULTNOMAH

ARELI LOPEZ,

Plaintiff,

v.

C & R REAL ESTATE SERVICES,
CO. and ROD MONROE,

Defendants.

C & R REAL ESTATE SERVICES,
CO. and ROD MONROE,

Third-Party Plaintiffs,

v.

JOSE RAMIREZ,

Third-Party Defendant.

Case No. 17CV32857

SUBPOENA DUCES TECUM

TO: Attn: Records Custodian, Portland Tenants United, 4815 NE 7th Ave., Portland, OR 97211

**RE: ARELI LOPEZ; DOB 03/30/1972
IN THE NAME OF THE STATE OF OREGON:**

You hereby are required to appear in the offices of HART WAGNER, LLP, 1000 S.W. Broadway, Suite 2000, Portland, Oregon 97205 on **April __, 2018, at 10:00 a.m.** to testify as a witness in the above cause on behalf of defendants.

You are commanded to bring with you all documents or records related to or referencing ARELI LOPEZ (DOB 03/30/1972), including, but not limited to, letters, posters, certificates, emails, text messages, voice messages, instant messages, Facebook messages and/or posts, Twitter messages and/or posts, Tumblr messages and/or posts, blogs, blurbs, comments, fliers, signs, photographs, videos, speech transcripts, correspondence, notes, etc. This subpoena specifically directs disclosure of all records in your possession, whether created by Areli Lopez or by Portland Tenants United or any of its former or current affiliates, members, or agents.

IN LIEU OF APPEARANCE, you may send a copy of the records to Taylor B. Lewis, HART WAGNER, LLP, 1000 S.W. Broadway, Suite 2000, Portland, Oregon 97205 for receipt on or before the date set forth above.

Dated: _____

Taylor B. Lewis, OSB No. 164263
Of Attorneys for Defendants/ Third-Party Plaintiffs

I hereby certify that the foregoing is a complete and exact copy of the original subpoena in the above-entitled cause.

Taylor B. Lewis, OSB No. 164263
Of Attorneys for Defendants/ Third-Party Plaintiffs

Witness fee.....\$ 30.00
Mileage.....\$ 5.00
Total.....\$ 35.00

Taylor B. Lewis
HART WAGNER, LLP
1000 SW Broadway, Suite
2000
Portland, Oregon 97205
Phone: (503) 222-4499

STATE OF OREGON, County of Multnomah ss:
I hereby certify that I served the within Subpoena Duces Tecum on the above date on the within named by mailing to him/her a copy thereof and mailing to him/her at the same time the fees and mileage (see opposite) to which he/she is entitled for travel to and from the place designated in said subpoena and one day's attendance; that I am a competent person over the age of 18 years.

Taylor B. Lewis, OSB No. 164263

IN THE CIRCUIT COURT OF THE STATE OF OREGON

FOR THE COUNTY OF MULTNOMAH

ARELI LOPEZ,

Plaintiff,

v.

C & R REAL ESTATE SERVICES,
CO. and ROD MONROE,

Defendants.

C & R REAL ESTATE SERVICES,
CO. and ROD MONROE,

Third-Party Plaintiffs,

v.

JOSE RAMIREZ,

Third-Party Defendant.

Case No. 17CV32857

SUBPOENA DUCES TECUM

TO: Attn: Records Custodian, Portland Tenants United, 4815 NE 7th Ave., Portland, OR 97211

**RE: JOSE RAMIREZ; DOB 08/19/1968
IN THE NAME OF THE STATE OF OREGON:**

You hereby are required to appear in the offices of HART WAGNER, LLP, 1000 S.W. Broadway, Suite 2000, Portland, Oregon 97205 on **April __, 2018, at 10:00 a.m.** to testify as a witness in the above cause on behalf of defendants.

You are commanded to bring with you all documents or records related to or referencing JOSE RAMIREZ (DOB 08/19/1968), including, but not limited to, letters, posters, certificates, emails, text messages, voice messages, instant messages, Facebook messages and/or posts, Twitter messages and/or posts, Tumblr messages and/or posts, blogs, blurbs, comments, fliers, signs, photographs, videos, speech transcripts, correspondence, notes, etc. This subpoena specifically directs disclosure of all records in your possession, whether created by Jose Ramirez or by Portland Tenants United or any of its former or current affiliates, members, or agents.

IN LIEU OF APPEARANCE, you may send a copy of the records to Taylor B. Lewis, HART WAGNER, LLP, 1000 S.W. Broadway, Suite 2000, Portland, Oregon 97205 for receipt on or before the date set forth above.

Dated: _____

Taylor B. Lewis, OSB No. 164263
Of Attorneys for Defendants/ Third-Party Plaintiffs

I hereby certify that the foregoing is a complete and exact copy of the original subpoena in the above-entitled cause.

Taylor B. Lewis, OSB No. 164263
Of Attorneys for Defendants/ Third-Party Plaintiffs

Witness fee.....\$ 30.00
Mileage.....\$ 5.00
Total.....\$ 35.00

Taylor B. Lewis
HART WAGNER, LLP
1000 SW Broadway, Suite
2000
Portland, Oregon 97205
Phone: (503) 222-4499

STATE OF OREGON, County of Multnomah ss:
I hereby certify that I served the within Subpoena Duces Tecum on the above date on the within named by mailing to him/her a copy thereof and mailing to him/her at the same time the fees and mileage (see opposite) to which he/she is entitled for travel to and from the place designated in said subpoena and one day's attendance; that I am a competent person over the age of 18 years.

Taylor B. Lewis, OSB No. 164263