

**HART  
WAGNER<sup>LLP</sup>**  
TRIAL ATTORNEYS

Taylor B. Lewis

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Admitted in Oregon

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1000 S.W. Broadway  
Portland, Oregon 97205  
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March 19, 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 Willamette Week; 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.

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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, Willamette Week, 2220 NW Quimby St., Portland, OR 97210**

**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 RECORDS** in your possession related to or referencing the article published on or about November 15, 2017, featuring Jose Ramirez (DOB: 08/19/1968). These records include, but are not limited to, copies of any and all notes, articles, recordings, reports, correspondence, both written and electronic, photographs, videos, including extra video footage, and/or other materials related to the above-referenced article. This request includes, but is not limited to, any notes made in the creation of the above-referenced article and any unedited drafts of any articles, videos, or recordings.

**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

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

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

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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.

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Taylor B. Lewis, OSB No. 164263



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Taylor B. Lewis, OSB No. 164263