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IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF COLUMBIA

IN THE MATTER OF THE PETITION of
the Board of County Commissioners of
COLUMBIA COUNTY, a political
subdivision of the State of Oregon,

Petitioner

For a Judicial Examination and Judgment of
the Court as to the Regularity, Legality,
Validity and Effect of the Columbia County
Second Amendment Sanctuary Ordinance

Case No. 21CV12796

DECLARATION OF SHANA
CAVANAUGH IN SUPPORT OF THE
COLUMBIA COUNTY RESIDENTS'
MOTION FOR SUMMARY JUDGMENT

I, Shana Cavanaugh, declare as follows:

1. This declaration is based on my personal knowledge and, if called to testify to the following facts, I could and would competently do so. I submit this declaration in support of the Columbia County Residents' Motion for Summary Judgment.

2. I am a resident of Columbia County, a taxpayer in Columbia County and an elector registered to vote in Columbia County.

3. I have two children in public schools in Columbia County.

4. I am the founder of Moving Forward Columbia County, a grassroots movement in Columbia County dedicated to promoting needed change and equity within local politics.

5. I am an interested party in this matter. I join this proceeding to present to the Court why Columbia County Initiative Measure 5-170, Columbia County Initiative Measure 5-

1 278, and the Columbia County Second Amendment Ordinance are unconstitutional and
2 inconsistent with federal and Oregon law.
3 **I hereby declare that the above statement is true to the best of my knowledge and belief,**
4 **and that I understand it is made for use as evidence in court and is subject to penalty for**
5 **perjury.**

6
7 DATED this 23 day of June, 2021.

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9 
10 Shana Cavanaugh

CERTIFICATE OF SERVICE

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I hereby certify that I served the foregoing **DECLARATION OF SHANA CAVANAUGH IN SUPPORT OF THE COLUMBIA COUNTY RESIDENTS' MOTION FOR SUMMARY JUDGMENT** on the following person by electronic service via the Oregon Judicial Department electronic filing system at the person's email address as recorded on the date of service in the electronic filing system or by the alternative means of service indicated below, by serving a true copy, hereby certified as such, with applicable email address or facsimile telephone number at which the party was served, and, upon any mailing, by placing the copy in a sealed envelope, with postage prepaid, addressed to such person at the address stated below and deposited in the mails of the United States Postal Service in Portland, Oregon, on this date:

Sarah Hanson
Office of County Counsel
Columbia County Courthouse, Room 20
St. Helens, OR 97051
Of Attorneys for Columbia County, Oregon

By Hand Delivery
By Facsimile Transmission
By U.S first class mail
By OJD E-File & Serve
By E-mail
Sarah.hanson@columbiacountyor.gov

Brian Simmonds Marshall
Senior Assistant Attorney General
100 SW Market Street
Portland, OR 97201
Of Attorneys for Oregon Attorney General

By Hand Delivery
By Facsimile Transmission
By U.S first class mail
By OJD E-File & Serve
By E-mail
Brian.S.Marshall@doj.state.or.us

Tyler Smith
Tyler Smith & Associates, PC.
181 N. Grant Street, Suite 212
Canby, OR 97013
*Of Attorneys for Raven Chris Brumbles,
Gun Owners of America, Inc., Gun Owners
Foundation, Oregon Firearms Federation,
Larry Erickson, Keith Forsythe, and Ruth
Nelson*

By Hand Delivery
By Facsimile Transmission
By U.S first class mail
By OJD E-File & Serve
By E-mail
Tyler@RuralBusinessAttorneys.com

1 DATED this 24th day of June, 2021.

2
3 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.

4
5 By: s/ Steven C. Berman
6 **Steven C. Berman**, OSB No. 951769
Lydia Anderson-Dana, OSB No. 166167

7 209 SW Oak Street, Suite 500
8 Portland, OR 97204
9 Telephone: (503) 227-1600
Facsimile: (503) 227-6840
Email: sberman@stollberne.com
landersondana@stollberne.com

10 *Attorneys for Robert Pile, Shana Cavanaugh, Brandee*
11 *Dudzic, and Joe Lewis*