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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

BRANDON AUSTIN,

Plaintiff,

v.

UNIVERSITY OF OREGON; SANDY WEINTRAUB; CHICORA MARTIN; ROBIN HOLMES; and MICHAEL R. GOTTFREDSON, all in their individual capacities only,

Defendants.

DOMINIC ARTIS and DAMYEAN DOTSON,

Plaintiffs,

v.

UNIVERSITY OF OREGON; SANDY WEINTRAUB; CHICORA MARTIN; ROBIN HOLMES; and MICHAEL R. GOTTFREDSON,

Defendants.

Case No.: 6:15-cv-02257-MC (Lead Case)
Case No.: 6:16-cv-00647-MC (Member Case)

DECLARATION OF LISA THORNTON IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS THIRD AMENDED COMPLAINT AND MEMORANDUM IN SUPPORT

I, Lisa Thornton, hereby declare as follows:

1. I am the Public Records Officer for the University of Oregon. I am a duly-authorized custodian at the University of Oregon of the attached records. I have the authority to certify the attached records.

2. The attached records are true copies of the records and were created at or near the time of the act, condition, or event described or referred to in them.

3. The attached records were prepared or received and kept by the University of Oregon, or persons acting under its control, in the ordinary course of regularly conducted business.

4. Attached as Exhibit A are copies of plaintiffs' signed scholarships.

5. Attached as Exhibit B is a copy of the text of President Gottfredson's public statement made on May 9, 2014.

6. Attached as Exhibit C are copies of an e-mail sent by Greg Veralrud to Douglas Park on or around May 28, 2014, a "Special Choice of Resolution Form" signed by Brandon Austin dated June 5, 2014, and a "Special Choice Resolution Form" signed by Damyeon Dotson dated June 19, 2014.

7. Attached as Exhibit D is a copy of three e-mails exchanged on or around May 28, 2014, between Laura Fine Moro and Douglas Park (which are also copied to Sandy Weintraub and Shaun McCrea).

8. Attached as Exhibit E are copies of hearing decision letters from Sandy Weintraub to Damyeon Dotson (with subject "Regarding Case: 00516-001-2014), Brandon Austin (with subject "Regarding Case: 00516-002-2014), and Dominic Artis (with subject "Regarding Case: 00516-003-2014) dated June 20, 2014.

9. Attached as Exhibit F are redacted copies of Brandon Austin's "Tort Claims Notice" dated October 7, 2014, Dominic Artis's "Tort Claims Notice" dated October 8, 2014, and Damyean Dotson's "Tort Claims Notice" dated October 9, 2014.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 1 day of December, 2016, in Eugene, Oregon.

A handwritten signature in blue ink that reads "Lisa Thornton". The signature is written over a solid horizontal line.

Lisa Thornton

I hereby certify that I served the foregoing Declaration of Lisa Thornton in
Support of Defendants' Motion to Dismiss and Memorandum in Support on:

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by the following indicated method or methods on the date set forth below:

- CM/ECF system transmission.**
- E-mail.** (Courtesy copy.)
- Facsimile communication device.**
- First-class mail, postage prepaid.**
- Hand-delivery.**
- Overnight courier, delivery prepaid.**

DATED this 2nd day of December, 2016.

s/Michelle Barton Smigel

Michelle Barton Smigel, OSB No. 045530

Of Attorneys for Defendants