

**IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH**

DANE HADACHEK, an individual,
CECIL MININGER, an individual,
SIERRA HADACHEK, an individual,
CARTER MOODY, an individual &
LONDON MOODY, an individual

Plaintiffs,

v.

THE STATE OF OREGON

Defendant.

No. 25CV18224

DECLARATION OF ERIC CLOPPER IN
SUPPORT OF MOTION FOR ADMISSION
PRO HAC VICE

I, Eric Clopper, declare:

1. I am an attorney licensed to practice law in the state of California and admitted to practice in all California state courts since December 1, 2022. I am the owner of The Clopper Law Firm, P.C., which is located at 2482 Cheremoya Ave., Los Angeles, CA 90068.

2. Lake James Perriguet is hereby designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the above-mentioned case and upon whom papers may be served in this case.

3. Lake James Perriguet shall, at all times, meaningfully participate in this case with the authority and responsibility to act as attorney of record for all purposes. Any document required or authorized to be served on counsel by the Oregon Rules of Civil Procedure or by the Rules of this Court, shall be served upon Lake James Perriguet. Such service shall be deemed proper and effective service.

4. I have been an active member in good standing of the California State Bar since my admission on December 1, 2022. There is not now, nor has there ever been, any disciplinary proceedings initiated against me. Further, I have never been cited for contempt by any court, nor am I the subject of any pending complaint before any court.

5. I am neither a resident of the State of Oregon, regularly employed in Oregon, nor regularly engaged in business, professional, or other activities in the State of Oregon.

6. Attached hereto as **Exhibit 1** is a complete Certificate of Compliance for Pro Hac Vice Admission including a letter from the California State Bar Association certifying my good standing as a lawyer in said state and proof of professional liability insurance.

7. I hereby request that the Circuit Court of Oregon admit me to practice *pro hac vice* in the above-captioned action on behalf of plaintiffs Dane Hadachek, Cecil Mininger, Sierra Hadachek, Carter Moody, and Landon Moody.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

Dated: June 3, 2025

Respectfully submitted,



Eric Clopper, CA State Bar No. 346031

In re: Eric Clopper

Name of Out-of-State Attorney

**Certificate of Compliance
For *Pro Hac Vice* Admission**

I, Eric Clopper (print name), am an attorney in the State(s) California
and I intend to seek *pro hac vice* admission in accordance with ORS 9.241 and UTCR 3.170 in the following Oregon court action or proceeding:

Case Name: Hadachek, et al. v. The State of Oregon

Court: Circuit Court for the County of Multnomah

Case No.: 25CV18224

I certify that (check all that apply):

- ☒ I am an attorney in good standing in the following State(s) California, as evidenced by the attached good standing certificates issued by the licensing authority in the state(s).
- ☒ I am not subject to any pending disciplinary proceedings in any jurisdiction; or
- ☐ I am subject to pending disciplinary proceedings in another jurisdiction, the nature and status of which are described in an attachment to this certificate.
- ☒ I intend to associate in the above-referenced action or proceeding with Lake James H Perriguet, OSB No. 983213, an active member in good standing of the Oregon State Bar, who will participate meaningfully in the matter.
- ☒ I will comply with applicable statutes, laws, and procedural rules of the State of Oregon; be familiar with and comply with disciplinary rules of the Oregon State Bar; and submit to the jurisdiction of the Oregon courts and Oregon State Bar with respect to acts and omissions occurring during my *pro hac vice* admission.
- ☒ My private law practice activities in Oregon are covered by professional liability insurance substantially equivalent to the Oregon State Bar Professional Liability Fund plan, as evidenced by the attached certificate of insurance coverage.
- ☒ I agree, as a continuing obligation of *pro hac vice* admission, to notify the trial court promptly of any changes in my insurance coverage, or my admission or disciplinary status in any other jurisdiction.
- ☒ I will provide to the Oregon State Bar a copy of the order admitting me *pro hac vice* in the above-referenced matter when such an order is granted. In the event *pro hac vice* admission is revoked for any reason, I will promptly notify the Oregon State Bar.
- ☒ I submit \$500 to the Oregon State Bar (Order no. 361969) as payment of the *pro hac vice* fee established by ORS 9.241 and the rules of the Oregon Supreme Court. I acknowledge that this fee is for a period of twelve months from the date of the Acknowledgment of Receipt issued below, and that an additional fee of \$500 will be required in order for me to continue my *pro hac vice* admission in the matter for every twelve-month period thereafter.

Dated this 20th day of May, 20 25.

X Eric Clopper
(Applicant Signature)

California Bar No.: 346031
(Home Jurisdiction)

Firm Name: The Clopper Law Firm, P.C.

Phone: (617) 957-2363

Mailing Address: 2482 Cheremoya Ave
Los Angeles, CA 90068

FAX: n/a

Email: eric@clopper.law

Acknowledgment of Receipt

As Director of Regulatory Services of the Oregon State Bar, I acknowledge receipt from the above-named out-of-state attorney of the Certificate of Compliance for *Pro Hac Vice* Admission and attachments, and the \$500 fee for *pro hac vice* appearance in the above-referenced Oregon action or proceeding. The fee is for a period of twelve months from the date of this acknowledgment.

Dated this 27th day of May, 20 25.

☐ SEE MATERIALS ATTACHED:

Sarra Yamin
Sarrah Yamin, Regulatory Counsel



Supreme Court of California

JORGE E. NAVARRETE

Clerk and Executive Officer of the Supreme Court

CERTIFICATE OF THE CLERK OF THE SUPREME COURT

OF THE

STATE OF CALIFORNIA

ERIC CLOPPER

I, JORGE E. NAVARRETE, Clerk and Executive Officer of the Supreme Court of the State of California, do hereby certify that ERIC CLOPPER, # 346031, was on the 1st day of December 2022 duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.

*Witness my hand and the seal of the court
on the 27th day of March 2025.*

JORGE E. NAVARRETE

*Clerk and Executive Officer of the Supreme
Court*

By: 
Biying Jia, Deputy Clerk



**LAWYERS PROFESSIONAL LIABILITY POLICY
UNDERWRITERS AT LLOYD'S**

Policy No. **SYN-115961**

Prev. No. **NEW**

UNDERWRITING MGR.:

Synergy Professional Associates, Inc.
100 Passaic Avenue, Suite 145
Fairfield, NJ 07004

CLAIMS MADE AND REPORTED POLICY. THIS POLICY PROVIDES COVERAGE FOR ONLY THOSE CLAIMS THAT ARE FIRST MADE AGAINST THE INSURED DURING THE POLICY PERIOD OR THE EXTENDED REPORTING PERIOD, IF PURCHASED, AND REPORTED IN ACCORDANCE WITH THE TERMS OF THIS POLICY. PLEASE REVIEW THE POLICY CAREFULLY

THIS POLICY CONTAINS PROVISIONS THAT REDUCE THE LIMITS OF LIABILITY STATED IN THE POLICY BY THE COSTS OF LEGAL DEFENSE AND PERMIT LEGAL DEFENSE COSTS TO BE APPLIED AGAINST THE DEDUCTIBLE.

Reference Number B152524U01261

1. NAMED INSURED: **The Clopper Law Firm, P.C.**

2. ADDRESS: **2482 Cheremoya Ave.**

Los Angeles, CA 90068

3. POLICY PERIOD: From **10/29/2024** TO **10/29/2025**
12:01 A.M. Standard Time at address of Named Insured state above.

4. LIMITS OF LIABILITY: **Per Claim \$1,000,000**

Aggregate \$1,000,000

5. DEDUCTIBLE: **Per Claim \$5,000**

6. RETRO DATE: **10/29/2024**

7. PREMIUM: **\$3,300.00**

Invoice Date: 10/29/2024
State Tax: \$99.00
Stamping Office Fee: \$5.94

8. ENDORSEMENTS: **See Schedule A**



S110

Authorized Signature

Date Issued: October 29, 2024

THE ABOVE POLICY HAS BEEN FILED WITH
THE SURPLUS LINES ASSOCIATION OF
CALIFORNIA BY SYNERGY PROFESSIONAL
INSURANCE BROKERS, LICENSE #0F22479.



THIS ENDORSEMENT CHANGES THE POLICY. PLEASE READ IT CAREFULLY.

SCHEDULE A

SCHEDULE OF FORMS

Policy Number: SYN-115961

FORMS AND ENDORSEMENTS THAT APPLY TO THIS POLICY:

COMMON POLICY

LMA 5506	(06-20)	Communicable Disease Endorsement
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PROFESSIONAL LIABILITY

S110	(01-24)	Lawyers Liability Policy Declaration
HTPLSyndicate	(01-24)	HTPL Syndicate List
ALAW100	(01-18)	Policy Form
SLAW1	(01-24)	Claims Reporting Endorsement
SLAW2	(09-05)	Minimum Earned Premium
NMA1998 (CA)	(01-20)	Service of Suit Clause
NMA1256	17/3/60	Nuclear Incident Exclusion
		Clause-Liability-Direct
NMA1191	7/5/59	Radioactive Contamination Exclusion
		Clause-Physical Damage-Direct
NMA464	1/1/38	War and Civil War Exclusion Clause
NMA45	(01-20)	Short Rate Cancellation Table Endorsement
		(U.S.A)
E00535	(01-21)	Amendatory Endorsement
D-2	(01-20)	CA Notice
LMA 3100	15/9/10	Sanction Limitation and Exclusion Clause
N1817001	(06-20)	Cyber Amendatory
IRM 2018	(01-21)	Insured Risk Management 2018