

LAW WORKS LLC
1906 SW Madison Street, Portland, OR 97205
Main (503) 227-1928 Fax (503) 334-2340 info@law-works.com

THE CLOPPER LAW FIRM PC
2482 Chermoya Avenue, Los Angeles, CA 90068
Phone: (617) 957-2363; eric@clopper.law; Admitted Pro Hac Vice

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

**DANE HADACHEK,
NATHANIEL HELLEWELL &
LONDON MOODY**

Plaintiffs,

v.

**THE STATE OF OREGON,

Defendant.**

Case No. 25CV18224

Third Amended Complaint seeking Declaratory and Injunctive Relief under ORS 28.010 *et seq.* Recognizing that Oregon’s Anti-Female Genital Cutting Laws, ORS 163.207 and 431A.600, Violate Oregon’s Equal Protection Clause, OR. CONST. art. I, § 20, and Equal Rights Amendment, *id.* § 46.

CLAIMS ARE NOT SUBJECT TO MANDATORY ARBITRATION

\$281 in fees under ORS 21.135(2)(f)

JURY TRIAL REQUESTED

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

1. Plaintiffs bring this action under ORS 28.010 *et seq.* to determine their rights, status, and other legal relations under Article I, sections 20 and 46 of the Oregon Constitution and ORS 163.207 and 431A.600 (Oregon’s “anti-FGC laws”).

2. Plaintiffs ask the Court to declare that, under the Oregon Constitution, either (a) Plaintiffs and similarly-situated Oregonians are protected from medically unnecessary genital cutting under Oregon’s anti-FGC (female genital cutting) laws, or (b) Oregon’s anti-FGC laws are null for impermissibly discriminating based on sex. Plaintiffs also ask the Court to enjoin Oregon from enforcing its anti-FGC laws discriminatorily.

I. NATURE OF THE CASE

3. “[C]ircumcision is an invasive medical procedure that results in permanent physical alteration of a body part and has attendant medical risks.” *In re Marriage of Boldt*, 344 Or. 1, 12 (2008) (De Muniz, C.J.). On July 15, 1999, Oregon (“Defendant”) enacted ORS 163.207 and 431A.600 (Oregon’s “anti-FGC laws”) to protect Oregon youth from harmful genital cutting practices that lack medical merit. But Oregon extended special protection only to female children. Today, it is a felony to “circumcise . . . any part of” a female child’s genitals unless “medically necessary.” ORS 163.207. Soon, Oregon may join the many states¹ that make it unlawful to declaw a house cat unless “medically necessary.” H.B. 3494, 2015 Leg. Assemb., Reg. Sess. (Or. 2015). But it remains completely legal in Oregon to amputate a male child’s foreskin for any reason, even if he is completely healthy.

4. As two authors of the American Academy of Pediatrics’ (“AAP’s”) most recent male circumcision policy statement said in October 2025, circumcision is “only a ‘medical procedure’ in the sense that medical professionals are performing it”; indeed, they stress that physicians “cannot recommend circumcision based on the medical benefit.”²

5. International medical associations—especially in Europe where male circumcision rates are in the low single digits—have long agreed circumcision is harmful and

¹ See, e.g., Cal. Bus. & Prof. Code § 4826.8 (“‘Therapeutic purpose’ does not include a procedure performed for a cosmetic or aesthetic purpose or to make the feline more convenient to keep or handle.”); N.Y. Ag. & Mkts. Law § 381; R.I. Gen. Laws § 4-1-44; Va. Code Ann. § 54.1-3814.

² Max Buckler, *As Controversies Mount, Circumcision Policies Need a Rethink* (J. Med. Ethics Preprint, 2025), https://www.researchgate.net/publication/396776580_As_controversies_mount_circumcision_policies_need_a_rethink.

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unethical. Several countries have attempted to ban male child circumcision, but their efforts have been thwarted by pressure from American interest groups.

6. Still, the American male circumcision rate has sharply dropped between 2012 and 2022, especially in the western United States. But by any measure, thousands of Oregon newborns, infants, and children are still at risk of medically unnecessary genital cutting, the very same circumstances that spurred lawmakers to enact Oregon’s anti-FGC laws.

7. Child genital cutting is physically and emotionally harmful. Plaintiff Nathaniel Hellewell’s experience is instructive. Although his circumcision was performed in a hospital by a doctor, it left the skin of his penis so tight that it pulls his scrotal skin upward to compensate. So much of Hellewell’s penile skin was amputated that he has suffered six testicular torsions, two of which required emergency care within roughly thirty minutes to avoid the loss of his testicles. The condition has also made sexual intercourse close to impossible because the remaining skin tightens painfully and tears, and he reports a general loss of penile sensitivity. He further describes significant mental distress from “seeing the scars and knowing a piece of [him] is gone,” and he says the ongoing pain has “put [him] in a very dark place numerous times.”

8. Not only are all Oregon boys at risk of physical and emotional harm, but they live with the stigma that their bodies deserve less legal protection against harm than their female peers. Speaking of male circumcision remains a taboo topic in part because anti-FGC laws like Oregon’s, by implication, condone male circumcision with full state backing. Male genital cutting (“MGC”) comes to be viewed as acceptable only because FGC is thought to be worse (“if MGC were so bad, why isn’t it illegal like FGC?”). But as scholars have recognized,

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3 “[l]aw . . . signals what behavior is appropriate toward certain groups. Thus, when law treats
4 members of a group as second-class citizens, it invites others to discriminate against that group
5 as well.”³

6 9. In reality, male circumcision—a legal form of MGC—is harmful for the exact
7 same medical and ethical reasons that certain forms of illegal FGC are. As the AAP has long
8 recognized, “[s]ome forms of FGC are *less* extensive than the newborn male circumcision
9 commonly performed in the West.”⁴

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11 10. Dane Hadachek, Nathaniel Hellewell, and Landon Moody (“Plaintiffs”) seek a
12 judicial declaration that Oregon’s anti-FGC laws unjustifiably treat male and female children
13 disparately in violation of Oregon’s Equal Protection Clause, OR. CONST. art. I, § 20, and Equal
14 Rights Amendment, *id.* § 46. In addition, Plaintiffs seek an injunction against Oregon from
15 enforcing its prohibition on child genital cutting only in favor of girls.

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17 11. This Complaint alleges that (1) Plaintiffs suffered and continue to suffer
18 physical, emotional, and stigmatic harm because Oregon treats males and females disparately,
19 (2) male circumcision and some forms of female child genital cutting are similar enough to
20 require equal legal treatment, and (3) this Court has the power to correct the legal inequality
21 by extending or nullifying Oregon’s anti-FGC laws to realize the mandate of equal treatment
22 required by Oregon’s constitution.

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³ Thomas Healy, *Stigmatic Harm and Standing*, 92 IOWA L. REV. 417, 452 (2007).

⁴ AM. ACAD. PEDIATRICS, *Ritual Genital Cutting of Female Minors*, 125 PEDIATRICS 1088, 1089 (2010),
<https://doi.org/10.1542/peds.2010-0187> (emphasis added).

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II. PARTIES

12. **Dane Hadachek** (“Hadachek”) is an 18-year-old male born in Bend, Oregon, on August 7, 2007. Shortly after his birth, doctors surgically removed parts of his genitals without medical need or a religious reason. Oregon law would have prevented this result if he were born female. Since then, he has suffered physical and emotional harm, as well as stigmatic harm because Oregon law treats him as undeserving of protection against genital cutting.

13. *Physical Harm:* Hadachek’s genitals bled profusely after his foreskin was cut off. Hadachek’s circumcision caused reduced sexual pleasure, dramatic reductions in the mechanical function of his penis, difficulty achieving orgasm, and drastic aesthetic changes including a circumferential scar on his penis.

14. *Emotional Harm:* Hadachek is resentful and suffers episodes of emotional distress because of the harm caused to him by Oregon’s imprimatur on male circumcision.

15. *Stigmatic Harm:* Hadachek is aggrieved that the most sensitive part of his penis was cut off without medical need, and that Oregon law did not protect him despite protecting similarly situated females from that result. Under current Oregon law, Hadachek lacks special statutory protection against medically unnecessary genital cutting solely because of his sex. In fact, the exact opposite is true: By prohibiting only FGC, Oregon’s anti-FGC laws implicitly condone male circumcision. Hadachek feels humiliated and degraded from the stigma he suffers from Oregon’s anti-FGC laws that fail to protect him solely because he was born male.

16. Hadachek suffered a stigmatizing injury (his circumcision) as a direct result of having personally been denied equal treatment. Circumcision is a prototypical stigmatizing

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2 injury in the most literal sense. The word *stigma* comes from Latin for “mark [or] brand,” and
3 the word *stigmata* literally refers to bodily scars like the one left from circumcision.⁵
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5 17. This state-sanctioned discrimination has branded Hadachek from birth as a
6 second-class citizen, leaving him feeling degraded and humiliated for losing agency over his
7 own body. Under current Oregon law, Hadachek—like all similarly-situated Oregonian
8 males—suffers harm because he is unjustifiably deemed inherently less worthy of bodily
9 integrity, personal autonomy, and privacy due to his sex.
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11 18. **Nathaniel Hellewell** (“Hellewell”) is a 19-year-old male born in Oregon on
12 June 21, 2006. Shortly after his birth, doctors surgically removed parts of his genitals without
13 medical need or a religious reason. Oregon law would have prevented this result if he were
14 born female. Since then, he has suffered physical and emotional harm, as well as stigmatic
15 harm because Oregon law treats him as undeserving of protection against genital cutting.
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17 19. *Physical Harm*: Hellewell’s circumcision was done so poorly that his scrotal
18 skin is pulled taught to compensate for the missing penile skin, resulting in six testicular
19 torsions, two of which brought him within thirty minutes of losing his testicles altogether. The
20 tightness has made it close to impossible for him to have sex because his skin will pull tight
21 and tear. And the general numbness of his penis would make sex futile anyway. His
22 circumcision surgery caused an infection which led to even more damage to his penis.
23 Hellewell still bears a circumferential scar on his penis.
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⁵ *Stigma*, Merriam-Webster, <https://www.merriam-webster.com/dictionary/stigma>.

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20. *Emotional Harm*: Hellewell is resentful and suffers episodes of emotional distress because of the harm caused to him by Oregon’s imprimatur on male circumcision. He describes mental distress from “seeing the scars and knowing a piece of [him] is gone.” “Knowing [he’ll] never get to know what it could have been like to not be in pain has put [him] in a very dark place numerous times.”

21. *Stigmatic Harm*: Hellewell—like all similarly-situated Oregonian males—suffers from the same stigmatizing injury as Hadachek, as alleged above.

22. **Landon Moody** (“Moody”) is a 25-year-old male born in Portland, Oregon, on July 22, 2000. Shortly after his birth, doctors surgically removed parts of his genitals without medical need or a religious reason. Oregon law would have prevented this result if he were born female. Since then, he has suffered physical and emotional harm, as well as stigmatic harm because Oregon law treats him as undeserving of protection against genital cutting.

23. *Physical Harm*: Moody’s circumcision caused reduced sexual pleasure, dramatic reductions in the mechanical function of his penis, difficulty achieving orgasm, and drastic aesthetic changes including a circumferential scar on his penis.

24. *Emotional Harm*: Moody is resentful and suffers episodes of emotional distress because of the harm caused to him by Oregon’s imprimatur on male circumcision.

25. *Stigmatic Harm*: Moody—like all similarly-situated Oregonian males—suffers from the same stigmatizing injury as Hadachek and Hellewell, as alleged above.

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3 26. This Court can redress Plaintiffs’ stigmatic injuries by either extending
4 Oregon’s anti-FGC laws or nullifying them.⁶

5 III. JURISDICTION AND VENUE

6 27. This action arises under the Oregon Constitution.

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8 28. This Court is authorized to issue declaratory relief under ORS 28.010 *et seq.*,
9 Oregon’s Uniform Declaratory Judgments Act (“UDJA”), and injunctive relief under ORS
10 28.080 specifically. Plaintiffs have standing to pursue their claims because they are males who
11 suffered medically unnecessary circumcision in Oregon as minors after Oregon’s anti-FGC
12 laws were enacted.

13 29. Venue is proper in this Court because some part of the cause of suit, including
14 Moody’s circumcision, arose in Multnomah County. ORS 14.060.

15 IV. GENERAL ALLEGATIONS

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17 30. When Plaintiffs were hours old, medical staff cut off approximately 51 percent
18 of their penile skin for no medical purpose. Oregon law allowed this to happen despite
19 outlawing analogous—and even some less-intrusive—procedures for female children years
20 before Plaintiffs were born. What happened to Plaintiffs would have been illegal in Oregon if
21 they were born female.

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23 31. Male circumcision, a form of male genital cutting, is the surgical removal of the
24 penile prepuce (“foreskin”) and oftentimes the penile frenulum.

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⁶ Nullification would not expose Oregon’s girls to the risk of FGC as it could be prosecuted under other provisions, but it would ameliorate the stigmatic harm Plaintiffs suffer by withdrawing special, sex-exclusive protections.

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32. Female genital cutting, sometimes called female genital mutilation or female circumcision, is the surgical removal of parts of the vulva, including the clitoral prepuce (“clitoral hood” or “female foreskin”) and clitoral frenulum.

33. The clitoral and penile prepuces, and the clitoral and penile frenula, are homologous structures.

34. Genital cutting is medically unnecessary when it is performed (1) without a medical diagnosis or in the absence of an extant or imminent medical condition, (2) to confer speculative preventative health benefits, or (3) to satisfy aesthetic, cultural, or religious preferences of the victim or his/her guardian. *See* ORS 163.207 (“In determining medical necessity . . . a person may not consider the effect on the child of the child’s belief that the surgery is required as a matter of custom or ritual.”).

35. Medically unnecessary genital cutting is a harmful practice condemned worldwide. No western medical association, not even in the United States, affirmatively recommends genital cutting of children as a routine health measure.

36. Internationally, male and female genital cutting face strong condemnation. Medical associations in Australia, Canada, and Europe have expressed grave concerns over the ethics of cutting children’s healthy genitals for any reason, regardless of sex. Courts and legislatures in Denmark, Finland, Iceland, and Germany have attempted to ban male circumcision. San Francisco voters proposed a similar ballot initiative in 2011.

37. Male and female genital cutting share strong similarities, but in an effort to eradicate FGC, human rights advocates have highlighted the worst forms of FGC, leading the public to believe it is incomparable to MGC. For example, many wrongly believe FGC always

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2 involves extensive vulvar cutting and/or sewing shut the vaginal canal. But this form of FGC,
3 known as “infibulation” or “Type III” FGC, accounts for less than 15 percent of cases
4 worldwide. The World Health Organization recognizes the following FGC categories, all
5 banned under Oregon law⁷:
6

Type	Name	Description
Type Ia	Female circumcision	“Removal of the prepuce/clitoral hood only.”
Type Ib	Clitoridectomy	“Removal of the clitoral glans with the prepuce/clitoral hood.”
Type II	Excision	“Partial or total removal of the clitoral glans and the labia minora . . . , with or without removal of the labia majora.”
Type III	Infibulation	“(Often referred to as infibulation). Narrowing of the vaginal opening with the creation of a covering seal.”
Type IV	E.g., “Ritual/ceremonial nick”	“All other harmful procedures to the female genitalia for non-medical purposes, for example pricking, piercing, incising, scraping and cauterization.”

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20 38. Type Ia FGC—also known as “female circumcision,” ORS 431A.600—
21 removes the female prepuce, a structure homologous to (though much smaller than) the male
22 prepuce. But it is illegal to perform Type Ia FGC on a child in at least 41 states (including
23 Oregon) and in a federal jurisdiction. Moreover, Type IV FGC can be *less* extensive than male
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⁷ World Health Org., *Types of Female Genital Mutilation*, [https://www.who.int/teams/sexual-and-reproductive-health-and-research-\(srh\)/areas-of-work/female-genital-mutilation/types-of-female-genital-mutilation](https://www.who.int/teams/sexual-and-reproductive-health-and-research-(srh)/areas-of-work/female-genital-mutilation/types-of-female-genital-mutilation).

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circumcision as it may involve a simple “ritual nick” that leaves no lasting damage. Yet it too is outlawed in Oregon and most other states in the United States.

39. The male prepuce, like the female prepuce, has sexual value. Researchers recognize the vital role of the female prepuce in sexual pleasure. Likewise, researchers recognize a comparable role of the male prepuce. In addition, the male and female prepuces have a similar anatomical structure, immunological function, and need for hygiene.

40. Male circumcision, like Type Ia FGC, is harmful. Both forms of genital cutting are major—not minor—operations that irreversibly remove functional and erogenous tissue in every case and are linked to numerous sexual dysfunctions. Both are performed on healthy children without the child’s consent, usually requiring him or her to be physically restrained. Neither is medically necessary in the overwhelming majority of cases; genital cutting is usually performed without a medical indication but rather based on the parents’ aesthetic, cultural, or religious preferences. Beyond physical harm, both forms of genital cutting deprive the victim of the ability to decide upon the look and function of his or her own genitals, even though most people who are kept intact at birth never elect to undergo genital cutting without a medical need to do so. Both MGC and FGC have also been linked to psychological harm.

41. Male circumcision, like Type Ia FGC, is painful. Male circumcision is routinely performed without analgesics—even in the medical setting—causing acute pain during the procedure. When analgesics are used, a common form is a sucrose pacifier—essentially a sweet lollipop. After circumcision, Tylenol is the best a child may hope for, whereas adults who undergo circumcision routinely are prescribed narcotics to handle the acute, post-operative pain of having the most erogenous part of one’s penis amputated.

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42. Male circumcision, like Type Ia FGC, carries operational risks including bleeding, loss of genital anatomy (beyond the prepuce itself), and death.

43. Male circumcision, like Type Ia FGC, lacks compelling health benefits. The AAP’s most recent, but now-expired, policy statement failed to link male circumcision with a compelling reduction of urinary tract infection (UTI), penile cancer, human immunodeficiency virus (HIV), chlamydia, gonorrhea, or herpes.

44. The alleged nominal benefits of circumcision are irrelevant because there are safer, more effective, and less expensive ways to treat UTI (with antibiotics), to avoid penile cancer (with HPV vaccines), and to prevent HIV and other sexually-transmitted infections (with condoms and/or oral antiretroviral medication called “PrEP”), without cutting off parts of a child’s genitals. Moreover, these alleged sexual wellness benefits are particularly irrelevant to minors—especially infants—who are not engaging in sexual intercourse.

45. Male circumcision, like Type Ia FGC, violates medical ethics. Even if circumcision marginally reduced the risk of some conditions (it likely does not), most minors do not benefit from circumcision at all. Medical ethics bars health care professionals from performing procedures without balancing harm, risk, and benefit to the patient, which in the case of child genital cutting are severely out of proportion. Male circumcision, like Type Ia FGC, also violates legal and bioethical principles of bodily integrity, personal autonomy, and privacy.

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3 46. Oregon first enacted its anti-FGC laws in 1999 for xenophobic reasons, but with
4 the noble purpose of banning harmful genital cutting. Oregon’s anti-FGC laws were said to
5 “send[] the message” to immigrant communities that “[FGC] is not acceptable in Oregon.”⁸

6 47. Because the purpose of Oregon’s anti-FGC laws was to prevent the medically
7 unnecessary modification of children’s genitals—and because male and female circumcision
8 share a materially similar profile of risk, harm, and lack of benefits—there is no compelling
9 reason to exclude male children from their protection. If Type Ia or IV FGC is banned, male
10 circumcision must be as well.
11

12 V. CLAIM FOR RELIEF

13 COUNT I

14 Denial of Equal Protection Based on Sex/Gender

15 Or. Const. art. I, §§ 20, 46

16 48. Plaintiffs incorporate by reference all prior paragraphs.

17 49. Oregon law protects female, but not male, children from medically unnecessary
18 genital cutting. Oregon law makes “female genital mutilation” a crime absent medical
19 necessity but permits male genital cutting even without medical necessity. ORS 163.207.
20 Oregon law also mandates public “education, prevention and outreach activities” to address
21 “female circumcision” but not male circumcision. ORS 431A.600.
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23 50. The Oregon Constitution commands that “No law shall be passed granting to
24 any citizen or class of citizens privileges, or immunities which, upon the same terms, shall not
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⁸ Relating to Female Genital Mutilation: Hearing on H.B. 3608 Before the H. Judiciary-Crim. Comm., 1999 Leg., Reg. Sess. (Or., Apr. 28, 1999) (statement of Lynn D. Partin, Women’s Rights Coalition).

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3 equally belong to all citizens.” OR. CONST. art. I § 20. In addition, it guarantees that “Equality
4 of rights under the law shall not be denied or abridged by the State of Oregon or by any political
5 subdivision in this state on account of sex.” *Id.* § 46.⁹

6 51. Sex is a suspect class under Oregon law. Laws that discriminate on the basis of
7 sex are subject to heightened scrutiny and may be upheld only in light of specific biological
8 differences between men and women.

9 52. ORS 163.207 contains a facial sex classification. It is a “crime of *female* genital
10 mutilation” to “knowingly circumcise[] . . . the whole or any part of” a female child’s genitals,
11 ORS 163.207 (emphasis added), including genital structures directly homologous to the male
12 prepuce that functionally vary in name only.

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14 53. Similarly, ORS 431A.600 contains a facial sex classification. It directs the
15 Oregon Health Authority to “establish and implement appropriate education, prevention and
16 outreach activities in communities that traditionally practice *female* circumcision.” ORS
17 431A.600 (emphasis added). But for the word “female,” the statute would cover “[]male
18 circumcision.” ORS 163.207 and 431A.600 also codify archaic sex stereotypes about the
19 enhanced vulnerability of girls.
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21 54. Oregon’s anti-FGC laws thus discriminate against male children by securing a
22 “privilege[]” to a “class of citizens” (female children) that is not secured for male children
23 “upon the same terms.” OR. CONST. art. I § 20. That is the privilege of special legal
24 protection against, and recognition of the harms of, medically unnecessary child genital
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⁹ Plaintiffs do not allege that § 20 and § 46 are exactly coextensive in their protection. Plaintiffs believe that § 46 could be even more protective than § 20, and vice versa. For space, Plaintiffs combine the two provisions under one Count.

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cutting. They also “den[y] or abridge[]” Plaintiffs’ “rights” to bodily integrity, personal autonomy, and privacy “on account of sex.” *Id.* § 46.

55. As alleged, the medical and ethical reasons to ban Types Ia and IV FGC are indistinguishable from the reasons to ban male circumcision. Or, at minimum, they are too modest to satisfy the level of scrutiny the constitution requires laws that discriminate on the basis of sex to satisfy.

56. Oregon’s anti-FGC laws violate Plaintiffs’ right to the equal protection of the law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully pray that this Court:

- i. Enjoin Oregon from enforcing ORS 163.207 and/or 431A.600 in a discriminatory manner;
- ii. Enter a judgment declaring that ORS 163.207 and/or 431A.600 violate(s) the equal rights guarantees in Article I, sections 20 and/or 46 of the Oregon Constitution; and
 - a. Interpret ORS 163.207 and/or 431A.600 to extend to male circumcision, such that Plaintiffs will no longer be stigmatized by unequal protection; or
 - b. Nullify ORS 163.207 and/or 431A.600, such that Plaintiffs will no longer be stigmatized by unequal protection; and
- iii. Grant such other relief, including costs, expenses, and/or reasonable attorneys’ fees, as the Court deems just and proper.

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Dated: January 15, 2026

Respectfully submitted,

LAW WORKS LLC

By: /s/ Lake Perriguet

Lake James H. Perriguet, Esquire
(OSB 983213)
Attorney for Plaintiffs Dane Hadachek,
Nathaniel Hellewell, and Landon Moody

THE CLOPPER LAW FIRM PC

By: 

ATTORNEY AT LAW

Eric Clopper, Esquire (CA SBN 346031)
Attorney for Plaintiffs Dane Hadachek,
Nathaniel Hellewell, and Landon Moody
Admitted *Pro Hac Vice*

Certificate of Service

I certify that I served a copy of this document on Defendant’s counsel by Odyssey
File & Serve on January 14, 2026.

s/Lake Perriguet, OSB 983213