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4 IN THE CIRCUIT COURT OF THE STATE OF OREGON
5 FOR THE COUNTY OF MULTNOMAH

6 DANE HADACHEK; NATHANIEL
7 HELLEWELL & LONDON MOODY,

8 Plaintiffs,

9 v.

10 THE STATE OF OREGON,

11 Defendant.

Case No. 25CV18224

DECLARATION OF SADIE FORZLEY IN
SUPPORT OF DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT

ORS 20.140 - State fees deferred at filing

12 I, Sadie Forzley, declare:

13 1. I am an Assistant Attorney General with the Oregon Department of Justice. I am
14 one of the attorneys assigned to represent Defendant in this case. I have personal knowledge of
15 the matters set forth herein.

16 2. I have retained an unnamed qualified expert who is available and willing to testify
17 to admissible facts or opinions creating a question of fact will be deemed sufficient to controvert
18 the allegations made by Plaintiffs and their experts in their response to Defendant's motion for
19 summary judgment.

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

23 DATED August 18, 2026.
24

25 s/ Sadie Forzley
SADIE FORZLEY

1 **CERTIFICATE OF SERVICE**

2 I certify that on August 18, 2026, I served the foregoing DECLARATION OF SADIE
3 FORZLEY IN SUPPORT OF DEFENDANT'S MOTION FOR SUMMARY JUDGMENT upon
4 the parties hereto by the method indicated below, and addressed to the following:

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