

EXHIBIT 70

TO

DECLARATION OF KATHERINE CHAMBERLAIN
IN SUPPORT OF PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT ON CLAIMS FOR
DECLARATORY AND INJUNCTIVE RELIEF

Steven A. Kraemer, OSB No. 882476
E-mail: sak@hartwagner.com
Gregory R. Roberson, OSB No. 064847
E-mail: grr@hartwagner.com
HART WAGNER LLP
1000 S.W. Broadway, Twentieth Floor
Portland, Oregon 97205
Telephone: (503) 222-4499
Facsimile: (503) 222-2301

Of Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

PRISON LEGAL NEWS, a project of the
HUMAN RIGHTS DEFENSE CENTER,

No. 3:12-cv-0071-SI

Plaintiff,

v.

DEFENDANTS' RESPONSE TO
PLAINTIFF'S FIRST REQUESTS FOR
ADMISSIONS TO ALL DEFENDANTS

COLUMBIA COUNTY; COLUMBIA
COUNTY SHERIFF'S OFFICE; JEFF
DICKERSON, individually and in his capacity
as Columbia County Sheriff,

Defendants.

Defendants answer Plaintiff's First Request for Admissions to All Defendants as follows:

REQUESTS

REQUEST FOR ADMISSION NO. 1: Deposition Exhibit 12 is a genuine copy of
information on the Columbia County Sheriff's Office website (www.co.columbia.or.us/sheriff) on
January 19, 2012.

 ✓ Admit

 Deny

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REQUEST FOR ADMISSION NO. 2: Deposition Exhibit 96 is a genuine copy of information on the Columbia County Sheriff's Office website (www.co.columbia.or.us/sheriff) on May 7, 2012.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 3: Deposition Exhibit 77 is a genuine copy of information on the Columbia County Sheriff's Office website (www.co.columbia.or.us/sheriff) on January 10, 2012.

Defendants do not have a copy of this exhibit. Based on plaintiff's representation that Deposition Ex. 77 is Ex. 1 to the Declaration of Katie Chamberlain (Dkt# 9-1) then,

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 4: Deposition Exhibit 97 is a genuine copy of information on the Columbia County Sheriff's Office website (www.co.columbia.or.us/sheriff) on May 21, 2012.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 5: Deposition Exhibit 98 is a genuine copy of information on the Columbia County Sheriff's Office website (www.co.columbia.or.us/sheriff) on June 7, 2012.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 6: Deposition Exhibit 98 is a genuine copy of information on the Columbia County Sheriff's Office website (www.co.columbia.or.us/sheriff) on July 3, 2012.

☐ Admit ☒ Deny

REQUEST FOR ADMISSION NO. 7: Deposition Exhibit 25 is a genuine copy of a Columbia County Jail Violation Notice dated October 31, 2011.

☒ Admit ☐ Deny

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REQUEST FOR ADMISSION NO. 8: Deposition Exhibit 26 is a genuine copy of a Columbia County Jail Mail Violation Notice dated October 24, 2011.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 9: Deposition Exhibit 27 is a genuine copy of a Columbia County Jail Inmate Request Form received by the Jail on December 23, 2011, and the Jail's response dated December 25, 2011.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 10: Deposition Exhibit 29 is a genuine copy of a Columbia County Jail Inmate Request Form received by the Jail on November 11, 2010, and the Jail's response dated November 11, 2010.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 11: Deposition Exhibit 30 is a genuine copy of a Columbia County Jail Inmate Request Form received by the Jail, and the Jail's response dated September 5, 2011.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 12: Deposition Exhibit 31 is a genuine copy of a Columbia County Jail Inmate Request Form received by the Jail on August 7, 2010, and the Jail's response on that date.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 13: Deposition Exhibit 32 is a genuine copy of a Columbia County Jail Inmate Request Form received by the Jail on September 11, 2011, and the Jail's response dated September 19, 2011.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 14: Deposition Exhibit 42 is a genuine copy of a Columbia County Jail Inmate Grievance Form received by the Jail in January 2012, and the Jail's response dated January 18, 2012.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 15: Deposition Exhibit 43 is a genuine copy of a Columbia County Jail Inmate Grievance Form received by the Jail on in November 2011, the Jail's responses dated November 22 and 23, 2011, and a Columbia County Jail Inmate Request form received by the Jail on December 17, 2011, and the Jail's response dated December 22, 2011.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 16: Deposition Exhibits 44 and 45 are genuine copies of a Columbia County Jail Inmate Grievance Form received by the Jail in February 2012, and the Jail's response dated March 14, 2012, respectively.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 17: Deposition Exhibit 60 is a genuine copy of a Columbia County Jail Inmate Grievance Form received by the Jail on January 29, 2010, and the Jail's response.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 18: Deposition Exhibit 61 is a genuine copy of a Columbia County Jail Inmate Request Form received by the Jail received on December 15, 2011, and the Jail's response.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 19: Deposition Exhibit 63 is a genuine copy of a Columbia County Jail Prohibited Mail Notification form dated February 10, 2012.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 20: Deposition Exhibit 67 is a genuine copy of a Columbia County Jail Inmate Request Form received by the Jail, and the Jail's response dated February 8, 2012.

☒ Admit ☐ Deny

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REQUEST FOR ADMISSION NO. 21: Pages 1 through 4 of Deposition Exhibit 95 is a genuine copy of email correspondence between Columbia County Sheriff's Office Sergeant Bryan Cutright and Jeff Mansheim on March 17, 2010.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 22: Pages 10 and 11 of Deposition Exhibit 95 is a genuine copy of email correspondence between Columbia County Sheriff's Office Sergeant Bryan Cutright and Jeff Mansheim on May 5-6, 2010.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 23: Deposition Exhibit 102 is a genuine copy of a Columbia County Jail Inmate Mail Guide that was available to inmates in the PODs from March 2010 until May 2012.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 24: Deposition Exhibit 101 is a genuine copy of a Columbia County Jail Inmate Mail Guide that the Jail placed in the inmate PODs on or about May 8, 2012.

☒ Admit ☐ Deny

REQUEST FOR ADMISSION NO. 25: Deposition Exhibit 125 is a genuine copy of a Columbia County Jail Inmate Grievance Form received by the Jail on January 14, 2012.

☒ Admit ☐ Deny

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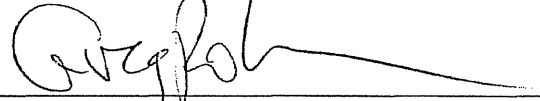
REQUEST FOR ADMISSION NO. 26: Deposition Exhibit 126 is a genuine copy of a Columbia County Jail Inmate Grievance Form received by the Jail on November 2, 2011, and the Jail's response dated November 21, 2011.

 ✓ Admit Deny

Respectfully submitted this 14 day of August, 2012.

HART WAGNER LLP

By: _____



Steven A. Kraemer, OSB No. 882476
Gregory R. Roberson, OSB No. 064847
Leslie A. Edenhofer OSB No. 093380
Of Attorneys for Defendants

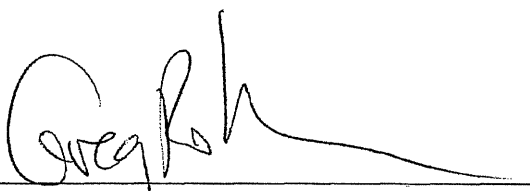
CERTIFICATE OF SERVICE

I hereby certify that on the 14 day of August, 2012, I served the foregoing
DEFENDANTS' RESPONSE TO PLAINTIFF'S FIRST REQUESTS FOR ADMISSIONS TO
ALL DEFENDANTS, on the following parties at the following addresses:

Marc D Blackman
Ransom Blackman LLP
1001 SW 5th Ave Ste 1400
Portland OR 97204

Katherine C Chamberlain
Jesse Wing
MacDonald Hoague & Bayless
705 Second Ave Ste 1500
Seattle WA 98104

e-mailing to them a true and correct copy thereof.



Gregory R. Roberson

EXHIBIT 71

TO
DECLARATION OF KATHERINE CHAMBERLAIN
IN SUPPORT OF PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT ON CLAIMS FOR
DECLARATORY AND INJUNCTIVE RELIEF

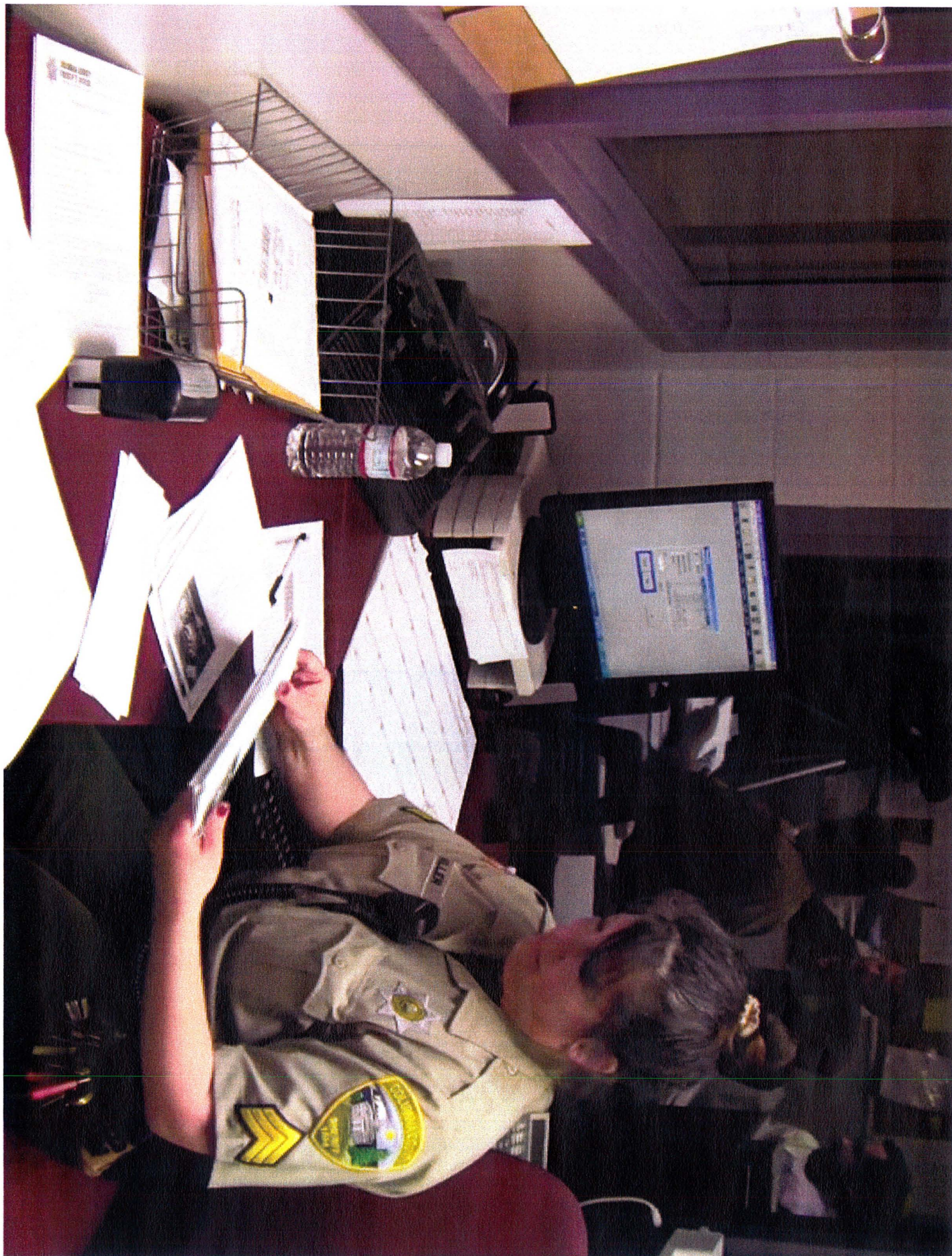


EXHIBIT 72

TO

DECLARATION OF KATHERINE CHAMBERLAIN
IN SUPPORT OF PLAINTIFF'S MOTION FOR
PARTIAL SUMMARY JUDGMENT ON CLAIMS FOR
DECLARATORY AND INJUNCTIVE RELIEF



EXHIBIT 73

TO

DECLARATION OF KATHERINE CHAMBERLAIN
IN SUPPORT OF PLAINTIFF'S MOTION FOR
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