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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

**TUCK WOODSTOCK; DOUG BROWN;  
SAM GEHRKE; MATHIEU LEWIS-  
ROLLAND; KAT MAHONEY; JOHN  
RUDOFF**; and those similarly situated,

Plaintiffs,

v.

**CITY OF PORTLAND**, a municipal  
corporation; and **JOHN DOES 1-60**,  
individual and supervisory officers of Portland  
Police Bureau and other agencies working in  
concert,

Defendants.

Case No. 3:20-cv-1035-BR

**DECLARATION OF BLAIR STENVICK  
IN SUPPORT OF PLAINTIFFS' MOTION  
FOR TEMPORARY RESTRAINING  
ORDER AND PRELIMINARY  
INJUNCTION**

I, Blair Stenvick, declare:

1. I am an Oregon resident who lives in Clackamas County. I am a news reporter with the *Portland Mercury*. I have attended the protests in Portland over the last month for the purpose of documenting and reporting on them. If called as a witness, I could, and would, testify competently to the facts below.

2. I have been a journalist for 10 years, and have been reporting in the Portland area since 2017. Locally, I have been published by the *Mercury* and Pamplin Media Group papers, including the *Portland Tribune*.

3. I wear my press badge whenever covering protests. I keep it prominently visible so that I can easily be identified as a member of the press. I do not participate in the protests in any way; nor do I intercede when the police threaten, attack, or arrest people. I merely document and report.

4. On the night of June 2, 2020, I was covering the protests in the area around the Justice Center with Alex Zielinski. I was near the back of the crowd, far from the Justice Center and the fence around it.

5. That night, as on many others, Portland police issued a dispersal order. They followed that order up with tear gas. However, they did not merely shoot tear gas from behind the fence at protesters near the fence. They also shot tear gas from the rear of the crowd, in what is known as a “kettling” or “killbox” tactic. Rather than disperse the crowd, this tactic trapped them in a cloud of concentrated tear gas. It ensured that everyone who was attending protests suffered the effects of the gas, including people at the back of the crowd, like me.

6. I was incapacitated by the tear gas and quickly sought medical attention. Once I recovered, I attempted to continue to report on the protests. However, the police continued to throw tear gas canisters indiscriminately into the crowd, and I was gassed again. Ultimately, my editor decided that my safety and wellbeing was at risk and instructed me to stop covering the protests for the night. Because the police inundated the entire crowd with tear gas, I was unable to do my job and report on the protests and how the police interacted with protesters.

7. I have been tear gassed by the police while covering the protests on several nights since June 2. Each time, it has hampered my reporting and made me less able to inform the public about the actions of the police.

8. In addition, I am aware of other incidents in which journalists have been harmed by Portland police's indiscriminate use of force against crowds of protesters, journalists, observers, and medics. I am also aware of incidents in which the police have used force against journalists in a targeted manner, and that the police have announced that apart from journalists who are embedded with them, any journalist who continues to report on protests after a dispersal order will be subjected to use of force and arrest.

9. These Portland police's violence and threats of violence against reporters make me feel unsafe when I report on the protests. I intend to continue reporting on them, but I am fearful for my safety.

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

Dated: June 29, 2020

DocuSigned by:  
*Blair Stenvick*  
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Blair Stenvick