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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,	Case No. 3:20-cv-1035-BR
Plaintiffs,	**DECLARATION OF MATTHEW BORDEN IN SUPPORT OF PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**
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.	

BORDEN DECL. IN SUPPORT OF MOTION FOR TRO & PRELIMINARY INJUNCTION

I, Matthew Borden, declare:

1.   I am an attorney at BraunHagey & Borden LLP, located in San Francisco, California. I am duly licensed to practice law before all courts in the State of California. I have applied to appear *pro hac vice* in this action as counsel of record for Plaintiffs. I base this declaration on facts within my personal knowledge and if called upon to testify, I could and would testify competently thereto.

2.   Attached hereto as **Exhibit 1** is a true and correct copy of a policy the Portland Police Bureau announced on Twitter on June 14, 2020, which is available at the following URLs: https://twitter.com/PortlandPolice/status/1272386738338410496 and https://twitter.com/PortlandPolice/status/1272386641462607872.

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

Dated: June 30, 2020

_____
Matthew Borden