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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,

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 ZACH PUTNAM IN  
SUPPORT OF PLAINTIFFS' MOTION  
FOR TEMPORARY RESTRAINING  
ORDER AND PRELIMINARY  
INJUNCTION**

I, Zach Putnam, declare:

1. I am an Oregon resident who lives in the City of Portland. I am a photographer and freelance video producer. I have attended several 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 following media reports on the George Floyd protests in Portland very carefully. As a result, I am aware of several incidents in which journalists have been harmed by the Portland police's indiscriminate use of force against crowds of protesters, journalists, observers, and medics.

3. I am also aware of incidents in which the police have used force against journalists in a targeted manner, such as when the police beat Donovan Farley with a baton and sprayed him with tear gas, and similar incidents with Cory Elia.

4. The Portland police's use of violence against journalists and their policy of using force to clear out reporters makes me feel unsafe. I would like to continue reporting on the protests, but I am fearful that the police might injure or kill me. As a result of the violent way the police have treated photographers, media and neutral observers, I leave the protests before it gets dark, even though I would like to stay longer to help record what happens.

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

Dated: June 27, 2020



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ZACH PUTNAM