

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF DESCHUTES

CITY OF BEND, an Oregon municipal
corporation,

PLAINTIFF,

v.

MICHAEL SATCHER and **CENTRAL
OREGON PEACEKEEPERS**, an Oregon
public benefit corporation,

DEFENDANTS.

CASE NO. 21CV10298

**STIPULATED GENERAL
JUDGMENT OF DISMISSAL**

It is hereby stipulated and agreed that all claims and counterclaims in the above-titled case be dismissed with prejudice. Plaintiff will not seek payment of any fee from Defendants in connection with the January 19, 2021, public records request, which Plaintiff fulfilled by providing all responsive records to Defendants. It is further agreed that Plaintiff shall pay to Defendants \$18,000 in reasonable attorneys' fees, costs, and expenses.

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1 Dated: April 19, 2022

2 **CITY OF BEND**

3
4 *s/ Ian Leitheiser*

5 Ian Leitheiser, OSB. No. 993106
6 ileitheiser@bendoregon.gov
7 *Of Attorneys for Plaintiff*

8
9
10 Dated: April 19, 2022

11 **VISIBLE LAW LLC**

12
13 *s/ Rian Peck*

14 Rian Peck, OSB. No. 144012
15 rian@visible.law
16 *Of Attorneys for Defendants*

Dated: April 19, 2022

**AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF OREGON**

s/ Kelly K. Simon

Kelly K. Simon, OSB No. 154213
ksimon@aclu-or.org
Of Attorneys for Defendants

Dated: April 19, 2022

ALAN LLOYD KESSLER

s/ Alan Lloyd Kessler

Alan Lloyd Kessler, OSB No. 150209
ak@alankessler.law
Of Attorneys for Defendants

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ORDER

Based on the foregoing Stipulation of the parties, by and through their attorneys of record, it is hereby ORDERED AND ADJUDGED that this matter is dismissed with prejudice and with an award of reasonable attorneys' fees, costs, and disbursements to Defendants in the amount of \$18,000.00, per the parties' agreement and stipulation.

Presented by:

Rian Peck, OSB No. 144012
rian@visible.law
Of Attorneys for Defendants

1 **CERTIFICATE OF READINESS**

2 Pursuant to UTCR 5.100, I hereby certify that this Order is ready for judicial
3 signature because:

- 4 1. Each party affected by this order or judgment has stipulated to the order or
5 judgment, as shown by each party’s signature on the document being submitted.
- 6 2. Each party affected by this order or judgment has approved the order or
7 judgment, as shown by each party’s signature on the document being submitted
8 or by written confirmation of approval sent to me.
- 9 3. I have served a copy of this order on each party entitled to service and:
10 a. No objection has been served on me.
11 b. I received objections that I could not resolve with a party despite
12 reasonable efforts to do so. I have filed a copy of the objections I received
13 and indicated which objections remain unresolved.
14 c. After conferring about objections, objecting party agreed to
15 independently file any remaining objection.
- 16 4. Service is not required pursuant to subsection (3) of this rule, or by statute,
17 rule, or otherwise.
- 18 5. This is a proposed judgment that includes an award of punitive damages
19 and notice has been served on the Director of Crime Victims’ Assistance Section
20 as required by subsection (5) of this rule.
- 21 6. Other: _____

22 Dated: April 19, 2022

VISIBLE LAW LLC

23 By: s/ Rian Peck
24 Rian Peck, OSB No. 144012

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CERTIFICATE OF SERVICE

I certify that on **April 19, 2022**, I caused to be served a full and exact copy of the above **Stipulated General Judgment of Dismissal** via email to Mary Alice Winters (mwinters@bendoregon.gov), Ian M. Leitheiser (ileitheiser@bendoregon.gov), Michael N. Selkirk (mseikirk@bendoregon.gov), Kelly K. Simon (ksimon@aclu-or.org), and Alan Kessler (ak@alankessler.law). I further certify that all parties have agreed to service by email under ORCP 9 G.

DATED: April 19, 2022

s/ Rian Peck

Rian Peck, OSB No. 144012