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Attorney for Plaintiffs

UNITED STATES DISTRICT COURT

THE DISTRICT OF OREGON

SANDY L. HENDERSON, ANNA  
MARGARET WICKER, JANE GRAY, and  
CARMELLE L. HARTIN,

CV 74-538

MOTION TO REOPEN

Plaintiffs,

v.

THE STATE OF OREGON BY AND  
THROUGH THE BUREAU OF LABOR  
AND THE BOARD OF HIGHER  
EDUCATION; NORMAN O. NILSEN,  
COMMISSIONER OF LABOR; DR. ROY  
LIEUALLEN, CHANCELLOR OF THE  
BOARD OF HIGHER EDUCATION; THE  
PUBLIC EMPLOYEES RETIREMENT  
SYSTEM; and JOSEPH J. ADAMS, HUGH  
McKINELY, CHALMERS L. JONES,  
ROGER S. MEIER and EDWIN H.  
ARMSTRONG, in their capacity as members  
of the PUBLIC EMPLOYEES RETIREMENT  
BOARD,

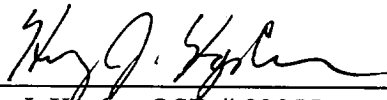
Defendants.

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Movants Eileen Shaffer, Tim Woolery, Richard Mullins, Jerry Trierweiler, Gina Santacroce, and Jacqueline Davais, current members of the Oregon Public Employees Retirement System ("PERS") and nonparty beneficiaries of the permanent injunction issued by the Court in the above-captioned action on September 20, 1978, move the Court for an order reopening the above-captioned action. The purpose of reopening this matter is to enforce the permanent injunction previously issued by this Court.

In support of their motion, movants rely upon their own affidavits as well as the affidavits of William F. Hoelscher and Gregory A. Hartman, and the memorandum of law filed with their motion for order to show cause filed herewith. The documents filed herewith establish the standing of movants to enforce the injunction, and the basis for the claim of violations of the orders of this Court.

Dated this 15 day of October, 2003.



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