FILED March 17, 2014 01:35 PM
Appellate Court Records

IN THE SUPREME COURT OF THE STATE OF OREGON

EVERICE MORO, TERRI DOMENIGONI, CHARLES CUSTER, JOHN HAWKINS, MICHAEL ARKEN, EUGENE DITTER, JOHN O'KIEF, MICHAEL SMITH, LANE JOHNSON, GREG CLOUSER, BRANDON SILENCE, ALISON VICKERY, and JIN VOEK,

PETITIONERS,

v.

STATE OF OREGON; STATE OF OREGON by and through the DEPARTMENT OF CORRECTIONS, LINN COUNTY; CITY OF PORTLAND; CITY OF SALEM; TUALATIN VALLEY FIRE & RESCUE; ESTACADA SCHOOL DISTRICT; OREGON CITY SCHOOL DISTRICT; ONTARIO SCHOOL DISTRICT; BEAVERTON SCHOOL DISTRICT; WEST LINN SCHOOL DISTRICT; BEND SCHOOL DISTRICT; and PUBLIC EMPLOYEES RETIREMENT BOARD,

RESPONDENTS.

Supreme Court Case No. **S061452**
(Control)

RESPONDENT CITY OF PORTLAND'S RESPONSE TO PETITIONER'S JOINT AND MORO PETITIONERS' PROPOSED FINDINGS OF FACT

WAYNE STANLEY JONES,

PETITIONER,

v.

PUBLIC EMPLOYEES RETIREMENT BOARD, ELLEN ROSENBLUM, Attorney General, and JOHN A. KITZHABER, Governor,

RESPONDENTS.

Supreme Court No. **S061431**

MICHAEL D. REYNOLDS, PETITIONER, v. **PUBLIC EMPLOYEES RETIREMENT BOARD, State of Oregon; and JOHN A. KITZHABER, Governor, State of Oregon,** RESPONDENTS.	Supreme Court Case No. **S061454**
GEORGE A. RIEMER, PETITIONER, v. **STATE OF OREGON, OREGON GOVERNOR JOHN A. KITZHABER, OREGON ATTORNEY GENERAL ELLEN ROSENBLUM, OREGON PUBLIC EMPLOYEES RETIREMENT BOARD, and OREGON PUBLIC EMPLOYEES RETIREMENT SYSTEM,** RESPONDENTS.	Supreme Court Case No. **S061475**

RESPONDENT CITY OF PORTLAND'S RESPONSE TO PETITIONER'S JOINT AND MORO PETITIONERS' PROPOSED FINDINGS OF FACT

Respondent City of Portland ("Portland") hereby responds to the Petitioner's Joint and Moro Petitioner's Proposed Findings of Fact. Portland is a named respondent only in the petition filed by Everice Moro, et al., ("Moro petitioners" or "Moro"), No. S061452.

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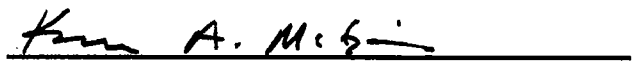
Portland joins in the response filed by Respondent State of Oregon to Petitioner's Proposed Stipulated Facts. Portland Respondent expressly retains all relevancy-based objections to all proposed findings.

Respectfully submitted,



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CERTIFICATE OF FILING AND SERVICE

I hereby certify that I electronically filed the foregoing CERTIFICATE OF FILING AND SERVICE **(RESPONDENT CITY OF PORTLAND'S RESPONSE TO PETITIONER'S JOINT AND MORO PETITIONERS' PROPOSED FINDINGS OF FACT)** with the State Court Administrator, Appellate Court Records Section, 1163 State Street, Salem, OR 97301, on March 17, 2014.

I further certify that the foregoing CERTIFICATE OF FILING AND SERVICE **RESPONDENT CITY OF PORTLAND'S RESPONSE TO PETITIONER'S JOINT AND MORO PETITIONERS' PROPOSED FINDINGS OF FACT** will be served electronically and/or by First Class Mail on March 17, 2014, on the following individuals:

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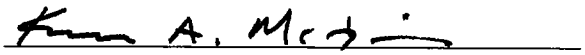

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