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

URSULA WHITE, BRUCE N. REITER, and
MARGARET RETZ,

Petitioners,

v.

PUBLIC EMPLOYEES RETIREMENT
BOARD,

Respondent,

and

STATE OF OREGON, LANE COUNTY, CITY
OF EUGENE, MULTNOMAH COUNTY,
CITY OF PORTLAND, CITY OR
ROSEBURG, CITY OF HUNTINGTON,
CANBY UTILITY BOARD, and ROGUE
RIVER VALLEY IRRIGATION DISTRICT,

Intervenors.

URSULA WHITE, BRUCE N. REITER, and
MARGARET RETZ,

Petitioners,

v.

PUBLIC EMPLOYEES RETIREMENT
BOARD,

Respondent,

and

STATE OF OREGON, LANE COUNTY, CITY
OF EUGENE, MULTNOMAH COUNTY,
CITY OF PORTLAND, CITY OR
ROSEBURG, CITY OF HUNTINGTON,
CANBY UTILITY BOARD, and ROGUE
RIVER VALLEY IRRIGATION DISTRICT,

Intervenors.

No. 0404-04118

**INTERVENOR STATE OF OREGON'S
REPLY MEMORANDUM IN SUPPORT
OF MOTION FOR SUMMARY
JUDGMENT**

(Oral Argument Requested)

The Honorable Henry Kantor

No. 0411-11848

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I. ARGUMENT

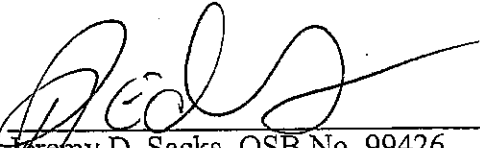
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Intervenor the State of Oregon adopts and incorporates herein as its own the facts and arguments presented in Respondent PERB's Reply Memorandum in Support of Motion for Summary Judgment and the supporting declarations of Sarah Marriott, James P. Baker, Dale Orr, and Eva Kripalani and in the Local Government Intervenors' Reply in Support of Motion for Summary Judgment and the supporting declaration of Sharon Rudnick. The State fully concurs in the reasoning and arguments presented by PERB and the Local Government Intervenors and believes that the interests of efficiency and judicial economy are served by adopting their briefs as its own rather than filing a separate brief addressing the same points and requesting the same outcome.

II. CONCLUSION

For the foregoing reasons, as well as those in PERB's and the Local Government Intervenors' Reply Memoranda, the State of Oregon respectfully requests the Court to grant the pending Motion for Summary Judgment.

DATED: July 21, 2008.

STOEL RIVES LLP

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CERTIFICATE OF SERVICE

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I hereby certify that I served the foregoing **INTERVENOR STATE OF OREGON'S REPLY MEMORANDUM IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT** on the following named person(s) on the date indicated below by

- mailing with postage prepaid
- hand delivery (As Noted Below)
- facsimile transmission
- overnight delivery
- e-mail

to said person(s) a true copy thereof, contained in a sealed envelope, addressed to said person(s) at his or her last-known address(es) indicated below.

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of Huntington, Canby Utility Board and
Rogue River Valley Irrigation

DATED: July 21, 2008.

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Attorneys Admitted *Pro Hac Vice* on Behalf
of Public Employees Retirement Board
("PERB")



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