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

**GREGORY A. CHAIMOV,**

Plaintiff,

v.

**STATE OF OREGON**, by and through the  
Oregon department of Administrative Services,

Defendant.

Case No. 18CV39159

**GENERAL JUDGMENT**

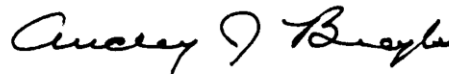
Based on the Order on the parties' Cross-Motions for Summary Judgment dated  
October 25, 2018, it is hereby

**ORDERED AND ADJUDGED:**

1. Defendant be enjoined from withholding the records referenced in the Amended Complaint.
2. Defendant is ordered to produce the records to Plaintiff's counsel on or before 5:00 p.m., Friday, October 26, 2018.
3. Plaintiff may apply for his attorney fees, costs and disbursements pursuant to ORCP 68(c).

**ORDERED AND ADJUDGED.**

Signed: 10/25/2018 11:20 AM



**Circuit Court Judge Audrey J. Broyles**

1 Submitted by:

2 John A. DiLorenzo, OSB #802040  
3 DAVIS WRIGHT TREMAINE LLP  
4 E-mail: [johndilorenzo@dwt.com](mailto: johndilorenzo@dwt.com)  
5 Of Attorneys for Plaintiff  
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1 **CERTIFICATE OF READINESS – UTCR 5.100**

2 (check all that apply):

3 This proposed order or judgment is ready for judicial signature because:

- 4 1.  Each party affected by this order or judgment has stipulated to the order or judgment, as  
5 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 judgment, as  
7 shown by each party’s signature on the document being submitted or by written  
8 confirmation of approval sent to me.
- 9 3.  I have served a copy of this order or judgment 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 reasonable  
12 efforts to do so. I have filed a copy of the objections I received and indicated  
13 which objections remain unresolved.
- 14 c.  After conferring about objections, [role and name of 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, rule or  
17 otherwise.
- 18 5.  This is a proposed judgment that includes an award of punitive damages and notice has  
19 been served on the Director of the Crime Victims’ Assistance Section as required by  
20 subsection (5) of this rule.

21  Other:

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**CERTIFICATE OF SERVICE**

I hereby certify that I served a copy of the foregoing **GENERAL JUDGMENT** on:

Ms. Sarah Kay Weston  
Ms. Carla Scott  
DOJ Trial Division  
100 SW Market St  
Portland, OR 97201  
Telephone: (971) 673-1880  
Facsimile: (971) 673-5000  
Email: sarah.weston@doj.state.or.us  
Email: carla.a.scott@doj.state.or.us

Of Attorneys for Defendant

by mailing a copy thereof in a sealed, first-class postage prepaid envelope, addressed to said attorney's last-known address and deposited in the U.S. mail at Portland, Oregon on the date set forth below;

by causing a copy thereof to be hand-delivered to said attorney's address as shown above on the date set forth below;

by sending a copy thereof via overnight courier in a sealed, prepaid envelope, addressed to said attorney's last-known address on the date set forth below;

by faxing a copy thereof to said attorney at his/her last-known facsimile number on the date set forth below; or

by emailing a copy thereof to said attorney at his/her last-known email address as set forth above.

by using electronic transmission of a notice of filing by the electronic filing system provided by the Oregon Judicial Department, Odyssey File and Serve.

Dated this 25th day of October 2018.

DAVIS WRIGHT TREMAINE LLP

By: s/ John A. DiLorenzo, Jr.

John A. DiLorenzo, Jr. OSB #802040

E-mail: johndilorenzo@dwt.com

Attorneys for Plaintiff