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

CHARMION FREIFELD AND JED
FREIFELD, a married couple residing in
the State of Oregon

Plaintiffs,

v.

LEISURE SPORTS, INC., a foreign
corporation; CLUBSPORT OREGON, an
assumed business name, SMG
PROPERTIES OREGON LLC,
registered as a foreign LLC in the State of
Oregon, and SAMUEL GREER, an
individual residing in the State of Oregon

Defendants.

Case No. 18CV12178


ORDER GRANTING PLAINTIFFS'
MOTION TO COMPEL DOCUMENTS
FROM DEFENDANT SAMUEL GREER
RELATED TO THE BOARD OF
MASSAGE THERAPISTS

On November 9, 2018, at 9 am, Plaintiffs' Motion to Compel Documents From
Defendant Samuel Greer Related to the Board of Massage Therapists came before the Court.
Plaintiffs were represented by their attorney Kristin Olson. Defendant Greer was represented
by his attorney Jessica Warner.

After considering the motion, oral argument, and briefing of the parties, and being
fully informed, it is hereby FOUND, CONCLUDED, AND ORDERED:

1 Plaintiffs' Motion to Compel Documents From Defendant Samuel Greer Related to
2 the Board of Massage Therapists is GRANTED. Subject to a mutually agreeable protective
3 order, Defendant Greer shall produce a complete, unredacted copy of all documentation
4 related to the Board of Massage Therapists' investigation concerning plaintiff Charmion
5 Freifeld within his possession, custody, and control.
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11 Signed: 12/28/2018 08:44 AM

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15 _____
16 Circuit Court Judge – Pro Tem, Edward Kroll

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18 Submitted by:
19 Kristin L. Olson, OSB No. 031333
20 kolson@olsonbroksby.com
21 OLSON BROOKSBY PC
22 1020 SW Taylor Street, Ste. 400
23 Portland, Oregon 97205
24 (503) 740-7608
25 Attorneys for plaintiffs
26

1 **CERTIFICATE OF COMPLIANCE WITH UTCR 5.100(2)**

2 (a) I certify that on November 15, 2018, and November 26, 2018, I served the
3 foregoing ORDER GRANTING PLAINTIFFS' MOTION TO COMPEL DOCUMENTS
4 FROM DEFENDANT SAMUEL GREER RELATED TO THE BOARD OF MASSAGE
THERAPISTS on the following:

5 Attorneys for Defendant
6 ClubSport, et al.:
7 Kenneth J. Abere, Jr.
8 Lewis Brisbois Bisgaard &
9 Smith LLP
10 888 SW Fifth Avenue, Suite
11 900
12 Portland, Oregon 97204-2025
13 ken.abere@lewisbrisbois.com
14 Attorneys for ClubSport
15 *Via US mail*

16 Attorney for Samuel Greer:
17 Jessica Warner
18 LINDSAY HART, LLP
19 1300 SW 5TH AVENUE,
20 SUITE 3400
21 PORTLAND, OR 97201-5640
22 Jwarner@lindsayhart.com
23 Attorneys for Samuel Greer
24 *Via US mail*
25 *And via email on November*
26 *14, 2018, and November 27,*
2018

(b) This proposed order or judgment is ready for judicial signature because:

1. Each party affected by this order or judgment has stipulated to the order or judgment, as shown by each party's signature on the document being submitted.
2. Each party affected by this order or judgment has approved the order or judgment, as shown by each party's signature on the document being submitted or by written confirmation of approval sent to me.
3. **I have served a copy of this order or judgment on each party entitled to service and:**
 - a. No objection has been served on me.

1 **b. [x] I received objections that I could not resolve with a party despite reasonable**
2 **efforts to do so. I have filed a copy of the objections I received as exhibits to my**
3 **declaration, filed herewith, and indicated which objections remain unresolved.**

4 c. [] After conferring about objections, [role and name of objecting party] agreed to
5 independently file any remaining objection.

6 4. [] Service is not required pursuant to subsection (3) of this rule, or by statute, rule, or
7 otherwise. UTCR 8/1/16 5.5 (including out-of-cycle amendment of 5.100)

8 5. [] This is a proposed judgment that includes an award of punitive damages and notice has
9 been served on the Director of the Crime Victims' Assistance Section as required by
10 subsection (5) of this rule.

11 6. [] Other: _____ .”

12 By /s/ Kristin L. Olson
13 Kristin L. Olson

14 Of Attorneys for plaintiffs
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