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

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|  L.K., Plaintiff,v. VN.H. LLC, V.C., N.P., K.P., S.P., AND JOHN DOES 1-5, Defendants. |  | No.: PLAINTIFF’S MOTION TO DESIGNATE KNOWN PARTIES USING PSEUDONYMS |

### Pursuant to SLR 2.035, Plaintiff seeks leave of the Court to designate known parties in this civil matter using pseudonyms.

# Designation of Plaintiff

### Plaintiff seeks leave to proceed using the pseudonym “L.K.” on multiple grounds. First, this matter involves Plaintiff’s physical abuse, sexual abuse, and sexual exploitation through sex trafficking. Documents filed in the case will necessarily disclose sensitive and embarrassing facts which would further stigmatize and traumatize Plaintiff, a victim of sex trafficking, if her identity is made public. Second, the facts supporting Plaintiff’s claims are the subject of an ongoing criminal investigation. Disclosure of Plaintiff’s name, as a long-term resident of the subject property would alert Defendants to the fact that awareness of their criminal conduct is now public.

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###  In support of her motion, Plaintiff notes that it is the standard practice in this county to allow sexual abuse victims to proceed using pseudonyms in civil suits due to the sensitive nature of the cases. *See e.g.: AGY and REC v. Archdiocese et al.,* Multnomah Co. Case No. 0401-00895 and *MK v. Archdiocese et al*.*,* Multnomah Co. Case No. 0109-09692 and *G.L. v. Kaiser Foundation Hospitals, Inc.*, 306 Or 54 (1988) (sexual abuse victim used pseudonym in Oregon Supreme Court case).

# designation of defendants

### To protect and maintain public safety in conducting the criminal investigation of Defendants, Plaintiff seeks leave to designate Defendants by pseudonyms in order to avoid disclosure of their identities in the caption of the Complaint and the other case documents presented to the Court.

Under SLR 2.035 and Oregon case law, defendants may be designated by pseudonyms in cases that involve sensitive subject matters, in this case, to protect public safety. *See e.g.: Kaiser Foundation Health Plan of the Northwest v. Doe*, 138 Or.App. 428 (1995). In that case, the court noted approval of the defendant’s use of a pseudonym “to afford confidentiality.” *Id.* at 430, fn 1.

Oregon courts also routinely approve of defendants proceeding using pseudonyms in parental custody cases. *See e.g.: In the Matter of A.M.C., a Minor Child. State ex rel. Department of Human Services v. J.A.C.*, 216 Or. App. 268 (2007); *Department of Human Services v. C.M.M., (In re E.T.M.)*, 250 Or.App. 67 (2012).

# CONCLUSION

Pursuant to local rules, common practice in this county, and case law in this state, Plaintiff respectfully asks that the court allow her to proceed with this case using pseudonyms for both herself and the Defendants in order to protect her safety, the safety of law enforcement investigators, and to protect the integrity of the criminal investigation of Defendants through until its completion.

DATED: this \_\_\_\_\_ day of February, 2019

Respectfully submitted,

Law Office of Joel Shapiro, PC

By: s/ Joel Shapiro­\_\_\_\_\_\_\_\_ \_

 Joel Shapiro, OSB No. 003814

Attorney for Plaintiff

Phone: (503) 224-5950

E-Mail: joel@joelshapirolaw.com

Trial Attorney: Joel Shapiro

# CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2019, I served the foregoing on the following party at the following address:

by email *and* mailing a true and correct copy thereof, certified by me as such, placed in a sealed envelope addressed to him at the address set forth above, and deposited in the U.S. Post Office at Portland, Oregon on said day with postage prepaid.

MALONEY LAUERSDORF REINER, PC

By

Andrew C. Lauersdorf, OSB #980739

Email: acl@mlrlegalteam.com

Janis C. Puracal, OSB #132288

Email: jcp@mlrlegalteam.com

Attorneys for Plaintiff