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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

MICHAEL G. SCHWERN,

Plaintiff,

v.

NÓIRÍN PLUNKETT,

Defendant.

Case No.: 3:14-cv-00146-PK

**DEFENDANT'S SPECIAL MOTION TO  
STRIKE PURSUANT TO ORS 31.150  
(ANTI-S.L.A.P.P. STATUTE)**

**Oral Argument Requested**

**LR 7-1(A) CERTIFICATION**

Undersigned counsel certifies that the parties made a good faith effort through telephone conference to resolve the dispute herein and have been unable to do so.

**MOTION**

Pursuant to ORS 31.150, defendant Nóirín Plunkett moves to strike all claims brought against her in the above-captioned case by plaintiff Michael G. Schwern on the grounds and for the reasons set forth in her supporting memorandum.

This motion is also supported by the accompanying "Declaration of Nóirín Plunkett" (referred to as "Plunkett Dec." in the accompanying memorandum).

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31.150 (ANTI-S.L.A.P.P. STATUTE)**

Upon allowance of her motion, defendant Plunkett is entitled to and hereby demands reasonable attorney fees and costs pursuant to ORS 31.152(3).

DATED this 20<sup>th</sup> day of February, 2014.

s/ Erin K. Olson  
Erin K. Olson, OSB 934776  
Attorney for Defendant

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true copy of the foregoing document and its supporting memorandum of law and "Declaration of Noirin Plunkett" on the following by CM/ECF System Transmission:

Bear Wilner-Nugent  
Bear Wilner-Nugent, Counselor and Attorney at Law LLC  
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Dated: February 20, 2014

s/ Erin K. Olson  
Erin K. Olson