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January 24, 2006

William H. Walters
Jeffrey D. Austin
Miller Nash LLP
3400 US Bancorp Tower
111 SW 5th Ave
Portland, OR 97204-3699

James N. Westwood
Stoel Rives LLP
900 SW 5th Ave Ste 2600
Portland, OR 97204

Public Records Request

Dear Messrs. Walters, Austin, and Westwood:

Because you represent Portland Public School District No. 1J, I make this public records request to the school district through you. If you give me permission to contact the school district directly about these records, I will prepare and submit a request for these same documents directly to the school district.

Request is hereby made for copies of all statements and documents provided to the public, to any and all bond rating companies, to any independent financial advisors, to any holder of any bond or financial obligation of the school district, to any government official, to any person retired from government service, to Portland Habilitation Center, to any labor union regarding:

- (1) the layoffs of the Portland Public Schools custodians;
- (2) the financial impact to Portland Public School District No. 1J resulting from:
 - a. the layoffs of the Portland Public Schools custodians;
 - b. the Oregon Supreme Court decision for the case of *Walter et al v. Scherzinger et al*, SC No. S51669, 339 Or 408, 121 P3d 644 (2005); and
- (3) friend of the court briefs in connection to the Oregon Supreme Court decision for the case of *Walter et al v. Scherzinger et al*, SC No. S51669, 339 Or 408, 121 P3d 644 (2005).

The term "statements and documents" is to be given the broadest possible interpretation. Statements and documents include, but are not limited to any written statements on any form of media – paper, email, fax transmission -, oral statements recorded on any form of media – audio tape, computer hard drive, video tape. Statements and documents requested are statements and documents created by, recorded by, or held by any school district employee (past or present), school district board member (past or present), and any person or entity hired by the school district – including but not limited to accountants, public relations consultants, and attorneys.

This request does not seek confidential communications between attorney and client. This request does seek all publicly and privately disseminated communications not protected by the attorney client privilege.

Sincerely,

JAMES E. LEUENBERGER PC

James E. Leuenberger

cc: clients