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

DOE,

Plaintiff,

v.

Individuals, whose true names are unknown,  
using the following pseudonyms:  
TS, RONALD, KRIS, and BILL

Defendants.

Case No. CV 0803 0693

**DECLARATION OF RECORDS  
CUSTODIAN OF WILLAMETTE  
WEEK**

I, Mark Zusman, being first duly sworn, depose and say:

1. I am the duly authorized custodian and have the authority to certify the attached records.

2. The attached records are true copies of all the documents described in Section 1, 2, 3(a), and 3(b) of the Subpoena *Duces Tecum* served upon Willamette Week in the above-captioned case.

3. The documents produced in response to the Subpoena *Duces Tecum* referenced in paragraph 2 were, depending upon the document, prepared or maintained by Willamette Week personnel acting in the ordinary course of business, at or near the time of the act or event described or referred to therein.

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1                    *I hereby declare that the above statement is true to the best of my knowledge and*  
2 *belief, and that I understand it is made for use as evidence in court and is subject to penalty for*  
3 *perjury.*

4                    DATED this 28 day of July, 2008.

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                         MARK ZUSMAN

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Ronald writes on Feb 1st, 2008 11:12pm

[Comment 18](#) | [Respond](#)

We had a scare that self proclaimed God himself Terry Beard was going to run. Now that Sho Dozano has severed all business ties with Terry Beard (cantakerous obnoxious dishonest new money pig self proclaimed god) of Beard Frame Shops and of TheBigBidet.com, oops, I mean Thebigday.com, I will vote for him. Many business leaders in Portland feel the same way. He really did himself a serious diservice when he decided to trust someone like Terry Beard. After hearing of how Terry Beard has mistreated so many, including his own employees, we couldn't understand why Sho was doing business with him. Thanks Sho for restoring our faith in you. Wow. What if Terry Beard ran for Mayor. That would be a joke. He thinks he is going to write a book on manners when he doesn't have any. I was in the booth next to him at Ringside, and all he did was brag about himself. Sad. Again, many of us are rooting for Sho here in Portland after he got rid of Terry Beard.

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