

HON. DAVID REES

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

STATE OF OREGON,

PLAINTIFF,

vs.

JOSEPH GIBSON,

DEFENDANT.

No. 19CR53042

JOSEPH GIBSON'S MOTION TO UNSEAL

MOTION

COMES NOW Joseph "Joey" Gibson, the defendant, by and through the Angus Lee Law Firm, PLLC, and moves for all pleadings in this matter to be unsealed.

LAW

Art. 1. Sec. 10 of the Oregon State Constitution states that "*No court shall be secret, but justice shall be administered, openly* and without purchase, completely and without delay, and every man shall have remedy by due course of law for injury done him in his person, property, or reputation." (emphasis added).

ARGUMENT

There appears to have been no motion to seal the accusatory instrument in this matter, yet it appears the accusatory instrument was in fact sealed without order or motion. The accusatory

instrument should be unsealed. Further, at this stage, there is no need for the warrant and supporting affidavit be sealed. The entire file should be unsealed at this point.

CONCLUSION

Mr. Gibson moves that the entire file be unsealed.

Respectfully submitted this Wednesday, August 28, 2019.

/s/ D. Angus Lee

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CERTIFICATE OF SERVICE

I, Carole A. Caldwell, hereby declare under penalty of perjury under the laws of the State of Oregon that the following facts are true and correct:

I am a citizen of the United States, over the age of 18 years, and not a party to or interested in the within entitled cause. I am an employee of Murphy & Buchal LLP and my business address is 3425 SE Yamhill Street, Suite 100, Portland, Oregon 97214.

On August 28, 2019, I caused the following document to be served:

JOSEPH GIBSON'S MOTION TO UNSEAL

in the following manner on the parties listed below:

Brad Kalbaugh	(X)	(BY FIRST CLASS US MAIL)
Multnomah County District Attorney's Office	(X)	(BY E-MAIL)
600 Multnomah County Courthouse	()	(BY FAX)
1021 SW 4th Ave	()	(BY HAND)
Portland OR 97204		
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/s/ Carole Caldwell