

HON. DAVID REES

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

STATE OF OREGON,

PLAINTIFF,

vs.

JOEY GIBSON,

DEFENDANT.

No. 19CR53042

MOTION FOR ORDER MODIFYING
JOSEPH GIBSON'S
RELEASE AGREEMENT

MOTION

Comes now Joseph Gibson, by and through the Angus Lee Law Firm, and respectfully moves the Multnomah County Circuit Court for an order modifying the release agreement to remove the current restriction that he "not leave the State of Oregon without permission of the Court."

BASIS

The release agreement in this case is a standard boiler plate release agreement with no consideration of the fact that Mr. Gibson is a long-term resident of Washington. See Mr. Gibson's Vancouver residential address on the release agreement and this court's Register of Actions). Further, Mr. Gibson is not a flight risk, as he turned himself in once he learned there was a warrant

1 for his arrest, and he has attended all mandatory court hearings to date.¹ There is no reason he
2 should be restricted to the State of Oregon.

3 This court has authority to “may modify the release agreement” considering this
4 information. ORS 135.285.

5 Mr. Gibson asks this court to enter an order modifying his release agreement to remove the
6 current restriction that he “not leave the State of Oregon without permission of the Court.”

7 Respectfully submitted this Monday, September 16, 2019.

/s/ D. Angus Lee

D. Angus Lee, WSBA# 36473 ***Pro Hoc Vice***
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¹ Mr. Gibson requests the court take judicial notice of these facts under ER 201.

CERTIFICATE OF SERVICE

I, D. Angus Lee, 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.

On Monday, September 16, 2019, I caused the following document to be served:

MOTION TO MODIFY RELEASE AGREEMENT

in the following manner on the parties listed below:

Brad Kalbaugh	()	(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		
E-mail: brad.kalbaugh@mcdca.us		

/s/ D. Angus Lee