

MULTNOMAH COUNTY CIRCUIT COURT
IN AND FOR THE STATE OF OREGON

STATE OF OREGON,

PLAINTIFF,

vs.

JOSEPH GIBSON,

DEFENDANT.

No. 19CR53042

**DECLARATION OF D. ANGUS LEE IN
SUPPORT OF JOSEPH GIBSON'S
RENEWED MOTION TO COMPEL
DISCOVERY OF ANY EVIDENCE OF
VIOLENT/TUMULTUOUS CONDUCT**

**[ORAL ARGUMENT REQUESTED]
[UTCRC 4.050]**

I, D. Angus Lee, declare under the penalty of perjury that the following is true and correct to the best of my knowledge. I am over the age of eighteen, and I am competent to testify to the matters herein. I have personal knowledge of the matters stated herein, or as indicated, have information concerning those matters. I am the attorney of record for Joseph Gibson, in the above captioned matter.

1. I have reviewed all discovery made available to me thus far in this matter.

2. Based on that review, I do not see evidence of any act that I believe is, or could reasonably be interpreted as, tumultuous and violent that is committed by Mr. Gibson.

DECLARATION OF D. ANGUS LEE IN
SUPPORT OF JOSEPH GIBSON'S RENEWED
MOTION TO COMPEL DISCOVERY OF ANY
EVIDENCE OF VIOLENT/TUMULTUOUS
CONDUCT

NO. 19CR53042

Tuesday, September 7, 2021

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

Signed at Vancouver, Washington, this Tuesday, September 7, 2021.

s/ D. Angus Lee

D. Angus Lee, WSBA# 36473

Attorneys for Joseph Gibson

Angus Lee Law Firm, PLLC

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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 P.O. Box 86620, Portland, Oregon 97286.

On September 7, 2021, I caused the following document to be served:

DECLARATION OF D. ANGUS LEE IN SUPPORT OF JOSEPH GIBSON'S RENEWED MOTION TO COMPEL DISCOVERY OF ANY EVIDENCE OF VIOLENT/TUMULTUOUS CONDUCT

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)
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1021 SW 4th Ave	()	(BY HAND)
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Counsel for Russell Schultz	()	(BY FIRST CLASS US MAIL)
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/s/ Carole Caldwell

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