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

IN THE MATTER OF THE  
PETITION of the Board of County  
Commissioners of COLUMBIA  
COUNTY, a political subdivision of  
the State of Oregon,

Petitioner

For a Judicial Examination and  
Judgment of the Court as to the  
Regularity, Legality, Validity and  
Effect of the Columbia County Second  
Amendment Sanctuary Ordinance

Case No. 21CV12796

**APPEARANCE – ORS 33.720(3) by  
Interested Parties: Robert Pile, Shana  
Cavanaugh, Brandee Dudzic, and Joe  
Lewis**

1. Interested Parties Robert Pile, Shana Cavanaugh, Brandee Dudzic, and Joe Lewis hereby appear in this validation proceeding. In this proceeding, Columbia County seeks guidance related to its authority to enact Ordinance 2021-1, “In the Matter of a Second Amendment Sanctuary in Columbia County,” which is based on Initiative Measure 5-270, entitled “Second Amendment Preservation Ordinance” and Initiative Measure 5-278, entitled “Second Amendment Sanctuary Ordinance.” These interested parties join this proceeding to present to the Court why Initiative Measure 5-270, Initiative Measure 5-278, and Ordinance 2021-1 are unconstitutional and inconsistent with federal and Oregon law.

1           2.       Pursuant to ORS 33.720(3), Robert Pile appears as an interested party in this  
2 validation proceeding. Pile has a child who attends public school in Columbia County, resides in  
3 Columbia County, is an elector who is registered to vote in Columbia County, and is a taxpayer  
4 in Columbia County. He is also a member of Moms Demand Action—Oregon. Moms Demand  
5 Action is a grassroots movement of Americans fighting for public safety measures that can  
6 protect people from gun violence. Moms Demand Action has established a local volunteer  
7 chapter in every state, and is part of Everytown for Gun Safety, the largest gun violence  
8 prevention organization in the country with more than six million supporters and 375,000  
9 donors. Pile joins this proceeding to present to the Court why Initiative Measure 5-270,  
10 Initiative Measure 5-278, and Ordinance 2021-1 are unconstitutional and inconsistent with  
11 federal and Oregon law.

12           3.       Pursuant to ORS 33.720(3), Shana Cavanaugh appears as an interested party in  
13 this validation proceeding. Cavanaugh is the founder of Moving Forward Columbia County, has  
14 two children in public schools in Columbia County, resides in Columbia County, is an elector  
15 who is registered to vote in Columbia County, and is a taxpayer in Columbia County.  
16 Cavanaugh joins this proceeding to present to the Court why Initiative Measure 5-270, Initiative  
17 Measure 5-278, and Ordinance 2021-1 are unconstitutional and inconsistent with federal and  
18 Oregon law.

19           4.       Pursuant to ORS 33.720(3), Brandee Dudzic appears as an interested party in this  
20 validation proceeding. Dudzic is a veteran, has two children who currently attend public schools  
21 in Columbia County and one child who recently graduated from public school in Columbia  
22 County, resides in Columbia County, is an elector who is registered to vote in Columbia County,  
23 and is a taxpayer in Columbia County. Dudzic joins this proceeding to present to the Court why  
24 Initiative Measure 5-270, Initiative Measure 5-278, and Ordinance 2021-1 are unconstitutional  
25 and inconsistent with federal and Oregon law.

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1           5.       Pursuant to ORS 33.720(3), Joe Lewis appears as an interested party in this  
2 validation proceeding. Lewis was a Scappoose school board member for 15 years, resides in  
3 Columbia County, is an elector who is registered to vote in Columbia County, and is a taxpayer  
4 in Columbia County. Lewis is also a survivor of the Kent State shooting of 1970, who was  
5 wounded as an 18-year-old freshman. Lewis joins this proceeding to present to the Court why  
6 Initiative Measure 5-270, Initiative Measure 5-278, and Ordinance 2021-1 are unconstitutional  
7 and inconsistent with federal and Oregon law.

8           6.       If necessary, this filing is also a motion to intervene in this proceeding.

9           7.       The interested parties seek to represent a public interest and will not receive any  
10 personal or pecuniary gains from this litigation.

11           WHEREFORE, Pile, Cavanaugh, Dudzic, and Lewis pray for judgment as follows:

12           1.       Declaring that Initiative Measure 5-270, Initiative Measure 5-278, and Ordinance  
13 2021-1 are unconstitutional and inconsistent with federal and Oregon law.

14           2.       Granting Pile, Cavanaugh, Dudzic, and Lewis their reasonable attorney fees,  
15 costs, and disbursements.

16           3.       Awarding Pile, Cavanaugh, Dudzic, and Lewis such other forms of relief as this  
17 Court deems just and necessary.

18           DATED this 29th day of April, 2021.

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STOLL STOLL BERNE LOKTING & SHLACHTER P.C.

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By: s/ Steven C. Berman

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**Steven C. Berman**, OSB No. 951769

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**Lydia Anderson-Dana**, OSB No. 166167

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-And-

Len Kamdang (*pro hac vice admission pending*)  
Mark Weiner (*pro hac vice admission pending*)  
EVERYTOWN LAW  
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P.O. Box 4184  
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*Attorneys for Robert Pile, Shana Cavanaugh, Brandee  
Dudzic, and Joe Lewis*

Trial Attorney: Steven C. Berman, OSB No. 951769

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I served the foregoing APPEARANCE BY INTERESTED  
3 PARTIES on the following person by electronic service via the Oregon Judicial Department  
4 electronic filing system at the person’s email address as recorded on the date of service in the  
5 electronic filing system or by the alternative means of service indicated below, by serving a true  
6 copy, hereby certified as such, with applicable email address or facsimile telephone number at  
7 which the party was served, and, upon any mailing, by placing the copy in a sealed envelope,  
8 with postage prepaid, addressed to such person at the address stated below and deposited in the  
9 mails of the United States Postal Service in Portland, Oregon, on this date:

10 Sarah Hanson  
11 Office of County Counsel  
12 Columbia County Courthouse, Room 20  
13 St. Helens, OR 97051  
14 [Sarah.hanson@columbiacountyor.gov](mailto:Sarah.hanson@columbiacountyor.gov)

- By Hand Delivery
- By Facsimile Transmission
- By U.S first class mail
- By OJD E-File & Serve
- By E-mail

15 *Of Attorneys for Columbia County, Oregon*

16 DATED this 29th day of April, 2021.

17 STOLL STOLL BERNE LOKTING & SHLACHTER P.C.

18  
19 By: s/ Steven C. Berman  
20 **Steven C. Berman**, OSB No. 951769  
**Lydia Anderson-Dana**, OSB No. 166167

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