

DUANE A BOSWORTH, OSB #82507

duanebosworth@dwt.com

DEREK D. GREEN, OSB # 042960

derekgreen@dwt.com

VANESSA A. USUI, OSB # 054804

vanessausui@dwt.com

DAVIS WRIGHT TREMAINE LLP

1300 S.W. Fifth Avenue, Suite 2300

Portland, Oregon 97201

Telephone: (503) 241-2300

Facsimile: (503) 778-5299

Attorneys for Intervenors The Associated Press,
Belo Corp. dba KGW-TV,
City of Roses Newspaper Company dba Willamette Week,
Fisher Communications, Inc. dba KATU-TV,
Meredith Corporation dba KPTV-Channel 12,
Montecito Broadcast Group dba KOIN-TV,
Oregonian Publishing Company and
Pamplin Media Group dba The Portland Tribune

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

AT PORTLAND

**JAMES P. CHASSE, JR.; JAMES P.
CHASSE; LINDA GERBER; and MARK
CHASSE**, individually and in his capacity as
Personal Representative of the **ESTATE OF
JAMES P. CHASSE, JR.**,

PLAINTIFFS,

v.

CHRISTOPHER HUMPHREYS; et al.,

DEFENDANTS.

Case No. CV 07-189 HU

**MOTION TO INTERVENE TO
OPPOSE THE CITY DEFENDANTS'
PROPOSED PROTECTIVE ORDER**

ORAL ARGUMENT REQUESTED

I. LR 7.1

Pursuant to L.R. 7.1, counsel for movants, The Associated Press, Belo Corp. dba

KGW-TV, City of Roses Newspaper Company dba Willamette Week, Fisher Communications, Inc. dba KATU-TV, Meredith Corporation dba KPTV-Channel 12, Montecito Broadcast Group dba KOIN-TV, Oregonian Publishing Company and Pamplin Media Group dba The Portland Tribune (collectively “the Media Organizations”) have conferred by telephone with counsel for defendants Humphreys, Nice, City of Portland and Tri-County Metropolitan Transportation District, and also with counsel for plaintiffs, defendants Multnomah County and Burton, and American Medical Response Northwest, Inc. regarding this motion but the parties have been unable to resolve their differences.

II. MEDIA ORGANIZATIONS’ MOTION

Pursuant to Federal Rule of Civil Procedure 24, The Associated Press, Belo Corp. dba KGW-TV, City of Roses Newspaper Company dba Willamette Week, Fisher Communications, Inc. dba KATU-TV, Meredith Corporation dba KPTV-Channel 12, Montecito Broadcast Group dba KOIN-TV, Oregonian Publishing Company and Pamplin Media Group dba The Portland Tribune move this Court for an order (1) allowing them to intervene in this matter for the limited purpose of opposing the proposed protective order submitted by defendants Humphreys, Nice, City of Portland and Tri-Met (“City Defendants”), and (2) for an order denying the protective order submitted by City Defendants. This motion is supported by the separately-filed memorandum in support and the declaration of Maxine Bernstein.

DATED this 10th day of October, 2007.

DAVIS WRIGHT TREMAINE LLP

By /s/ Duane A. Bosworth

Duane A. Bosworth, OSB #82507

duanebosworth@dwt.com

Telephone: (503) 241-2300

Facsimile: (503)-778-5299

Attorneys for Intervenor Media Organizations