

**Matthew Borden**, admitted *pro hac vice*  
borden@braunhagey.com

**J. Noah Hagey**, admitted *pro hac vice*  
hagey@braunhagey.com

**Athul K. Acharya**, OSB No. 152436  
acharya@braunhagey.com

**Gunnar K. Martz**, admitted *pro hac vice*  
martz@braunhagey.com

BRAUNHAGEY & BORDEN LLP  
351 California Street, Tenth Floor  
San Francisco, CA 94104  
Telephone: (415) 599-0210

**Kelly K. Simon**, OSB No. 154213  
ksimon@aclu-or.org

AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF OREGON  
P.O. Box 40585  
Portland, OR 97240  
Telephone: (503) 227-6928

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

**INDEX NEWSPAPERS LLC**, a Washington limited-liability company, dba **PORTLAND MERCURY**; **DOUG BROWN**; **BRIAN CONLEY**; **SAM GEHRKE**; **MATHIEU LEWIS-ROLLAND**; **KAT MAHONEY**; **SERGIO OLMOS**; **JOHN RUDOFF**; **ALEX MILAN TRACY**; **TUCK WOODSTOCK**; **JUSTIN YAU**; and those similarly situated,

Plaintiffs,

v.

**CITY OF PORTLAND**, a municipal corporation; **JOHN DOES 1-60**, officers of Portland Police Bureau and other agencies working in concert; **U.S. DEPARTMENT OF HOMELAND SECURITY**; and **U.S. MARSHALS SERVICE**,

Defendants.

Case No. 3:20-cv-1035-SI

**DECLARATION OF REBECCA ELLIS  
REGARDING EVENTS OF JULY 23-24,  
2020**

I, Rebecca Ellis, declare:

1. I am an Oregon resident who lives in the City of Portland. I am a staff reporter for OPB, and have been employed in that position for about a year. Before that, I was at NPR. I have attended the protests in Portland for the purpose of observing and reporting on them. If called as a witness, I could and would testify competently to the facts below.

2. When I report on the protests, I wear my press pass issued by OPB. It has my name, my photograph, and the OPB logo.

3. I attended the protests on the night of July 23, 2020, and into the morning of July 24, 2020, to report for OPB. Around 1:30 a.m., I saw a number of federal agents exit the Hatfield Courthouse and begin walking up SW Main Street. I saw 3-4 members of the press in the crosswalk on the east side of SW 3rd Avenue across SW Main., so I joined them and filmed the federal agents as they approached.

4. All of a sudden, a federal agent fired a munition directly at me, hitting me in the hand. A video I took accurately depicting this event can be viewed here: <https://twitter.com/Rjaellis/status/1286578718693978113>. I also suffered a single burn on my arm.

5. Around ten minutes later, I was on SW Salmon Street, with a number of other members of the press. Despite the TRO permitting press to remain and report after the issuance of a dispersal order, federal agents forced me and my colleagues to exit the area and prevented us from reporting. One agent shouted in our faces “MOVE, MOVE,” and “WALK FASTER!” Another agent, next to him, kept pace holding his gun. These two agents together prevented me and my colleagues from reporting on what was going on behind them. A video I took accurately depicting these events can be viewed here: <https://twitter.com/Rjaellis/status/1286581690626748416>.

6. Federal agents prevented me from doing my job twice on the night of July 23-24. I intend to continue covering the protests, but I am fearful for my safety.

I declare under penalty of perjury under the laws of United States of America that the foregoing is true and correct.

Dated: July 26, 2020

DocuSigned by:  
*Rebecca Ellis*  
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Rebecca Ellis