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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

JAMES M. CLEAVENGER,

Plaintiff,

vs.

**UNIVERSITY OF OREGON (an Agency and
Instrumentality of the State of Oregon), et al.,**

Defendants.

Case No. 6:13-cv-01908-DOC

**PLAINTIFF'S OBJECTIONS TO
DEFENDANTS' EXHIBITS**

Plaintiff hereby requests oral argument on this matter, and responds to defendants' proposed exhibits as follows:

I. SPECIFIC OBJECTIONS

Exhibit 316. Objection – Foundation. When was this document created? It is not dated or signed.

Exhibit 350. Objection - Foundation. There is no evidence this was ever sent to Plaintiff.

Is there a signed copy?

Exhibit 359. See Plaintiff's Response to Defendants' Motion in Limine, #7.

Exhibit 361. See Plaintiff's Response to Defendants' Motion in Limine, #7.

Exhibit 377. Objection – Relevance. The adoption date of 12/16/2014 is after the lawsuit was filed, and after the *Brady* submission.

Exhibits 393, 394, 395, 396. Objection – Relevance. The witnesses' resumes are not at issue. These are fact witnesses.

Exhibit 398. Objection - Prior bad acts.

DATED August 17, 2015.

/s/ Mark McDougal

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CERTIFICATE OF SERVICE

I certify that on August 17, 2015, I served or caused to be served a true and complete copy of the foregoing **PLAINTIFF'S OBJECTIONS TO DEFENDANTS' EXHIBITS** on the party or parties listed below as follows:

Andrea Coit
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Via CM / ECF Filing

/s/ Mark McDougal

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