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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

MATS JARLSTROM, an individual,

Plaintiff,

v.

CITY OF BEAVERTON, an Oregon municipal
corporation,

Defendant.

Case No.: 3:14-cv-00783-AC

**PLAINTIFF'S MOTION FOR LEAVE
TO FILE FIRST AMENDED
COMPLAINT**

Oral Argument Requested

Pursuant to FRCP 15, plaintiff moves for leave to file the First Amended Complaint attached as Exhibit A. The Complaint makes a number of changes that address issues raised in defendant's Motion to Dismiss. This action was filed on May 13, 2014. Given the very early stage of this litigation, there is no prejudice to defendant if plaintiff is granted leave to file a First Amended Complaint. Further, under FRCP 15 and governing case law, leave to amend should be given "freely" when justice so requires.

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**PAGE 1 – PLAINTIFF'S MOTION FOR LEAVE TO
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Pursuant to LR 7-1, the parties have conferred regarding the subject matter of this motion and defendant opposes plaintiff's motion.

DATED this 3rd day of July, 2014.

HAGLUND KELLEY LLP

By: /s/ Michael E. Haglund
Michael E. Haglund, OSB No. 772030
mhaglund@hk-law.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of July, 2014, I served the foregoing **PLAINTIFF'S MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT**, on the following:

Gerald L. Warren
Law office of Gerald Warren
901 Capitol Street, NE
Salem OR 97301

Attorney for Defendant

by the following indicated method(s):

- by **mail** with the United States Post Office at Portland, Oregon in a sealed first-class postage prepaid envelope.
- by **email**.
- by **hand delivery**.
- by overnight mail.
- by **facsimile**.
- by the court's Cm/ECF system.

/s/ Michael E. Haglund
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