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Of Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DISTRICT

**CHIXAPKAID DONALD MICHAEL
PAVEL;**

Case No. 6:16-CV-00819-AA

Plaintiff,

v.

**UNIVERSITY OF OREGON; DOUG
BLANDY; PENELOPE DAUGHERTY;
ANNIE BENTZ; RANDY KAMPHAUS;
JULIET A. BAXTER; JANNE
UNDERRINER; JASON YOUNKER; and
BRIAN KLOPOTEK;**

Defendants.

**DEFENDANTS BLANDY,
DAUGHERTY, BENTZ,
KAMPHAUS, BAXTER,
UNDERRINER, YOUNKER AND
KLOPOTEK'S
MOTION FOR PARTIAL
SUMMARY JUDGMENT**

Request for Oral Argument

LR 7-1 CERTIFICATION

Counsel for Defendants certifies that in accordance with Local Rule 7-1(a), the parties made a good faith effort through telephone conferences to resolve the dispute and have been unable to do so.

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MOTION

Pursuant to Fed. R. Civ. P. 56, Defendants Doug Blandy, Penelope Daugherty, Annie Bentz, Randy Kamphaus, Juliet A. Baxter, Janne Underriner, Jason Younker, and Brian Klopotek (collectively the “Individual Defendants”) move for orders of partial summary judgment as follows:

1. In Individual Defendants’ favor and dismissing Plaintiff’s First Claim for Relief;
2. In Individual Defendants’ favor and dismissing Plaintiff’s Second Claim for Relief;
3. An award of reasonable attorney fees pursuant to 42 U.S.C. §1988; and
4. Such lesser orders of summary judgment in Individual Defendants’ favor as the Court deems appropriate.

SUPPORTING MATERIALS

This Motion is supported by the Memorandum of Law in Support of Motion for Partial Summary Judgment by Individual Defendants, Declaration of Doug Blandy, Penelope Daugherty, Declaration of William D. Brady II, and the exhibits attached thereto.

DATED: December 27, 2016.

HERSHNER HUNTER, LLP

By /s/ Amanda M. Walkup
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