

1 Katherine C. Chamberlain, OSB #042580  
katherinec@mhb.com  
2 Jesse A. Wing, *pro hac vice*  
jessew@mhb.com  
3 Of Attorneys for Plaintiff Prison Legal News  
MacDonald Hoague & Bayless  
4 705 Second Avenue, Suite 1500  
Seattle, Washington 98104-1745  
5 (206) 622-1604

6 Marc D. Blackman, OSB #730338  
mark@ransomblackman.com  
7 Of Attorneys for Plaintiff Prison Legal News  
Ransom Blackman LLP  
8 1001 SW 5th Ave., Suite 1400  
Portland, OR 97204  
9 (503) 228-0487

10 Lance Weber, *pro hac vice*  
lweber@humanrightsdefensecenter.org  
11 Of Attorneys for Plaintiff Prison Legal News  
Human Rights Defense Center  
12 1037 Western Ave., 2<sup>nd</sup> Floor  
West Brattleboro, VT 05303  
13 (802) 257-1342

14  
15  
16 UNITED STATES DISTRICT COURT  
17 DISTRICT OF OREGON  
18 PORTLAND DIVISION  
19

20  
21 PRISON LEGAL NEWS, a project of the  
HUMAN RIGHTS DEFENSE CENTER,

No. CV 12-71-SI

22 Plaintiff,

23 v.

24 COLUMBIA COUNTY; COLUMBIA  
COUNTY SHERIFF'S OFFICE; JEFF  
25 DICKERSON, individually and in his capacity  
as Columbia County Sheriff,

26 PLAINTIFF'S MOTION FOR  
PRELIMINARY INJUNCTION  
Pursuant to Fed. R. Civ. P. 65(a)  
Request for Oral Argument

27 Defendants.

1 COMES NOW Prison Legal News and respectfully moves for an order preliminarily  
2 enjoining Defendants from enforcing unconstitutional jail mail policies to reject or otherwise  
3 censor news journals, subscription materials, book offers, book catalogs, and other  
4 correspondence, and ordering Defendants to afford Plaintiff, other correspondents, and prisoners  
5 due process notice and an opportunity to challenge Defendants' censorship decisions.

6 In compliance with D. Or. LR 7-1(a)(1)(A), the parties have made a good faith effort  
7 through telephone conferences to resolve the dispute and have been unable to do so. *See*  
8 Declaration of Katherine Chamberlain, ¶¶ 14-22.

9 Submitted in support of this Motion are Plaintiff's Legal Memorandum, Declaration of  
10 Paul Wright, Declaration of Katherine Chamberlain, Declaration of Lucy Lennox, Declaration of  
11 Ezra St. Helen, Declaration of Troy McCarter, Declaration of Rusty Campo, and Declaration of  
12 Martin Kay.

13 WHEREFORE, Prison Legal News asks that the Court grant Plaintiff's motion for  
14 preliminary injunction.

15 DATED this 31st day of January, 2012.

16  
17 MACDONALD HOAGUE & BAYLESS

18 */s/ Katherine C. Chamberlain*  
19 KATHERINE C. CHAMBERLAIN  
20 OSB #042580  
21 (206) 622-1604  
22 Of Attorneys for Plaintiff Prison Legal News  
23  
24  
25  
26  
27

**CERTIFICATE OF SERVICE**

I hereby certify that on January 31, 2012, I electronically filed the foregoing to the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

- **Marc D. Blackman**  
marc@ransomblackman.com, pat@ransomblackman.com
- **Gregory R. Roberson**  
grr@hartwagner.com, cej@hartwagner.com
- **Lance Weber**  
lweber@humanrightsdefensecenter.org
- **Jesse Wing**  
JesseW@mhb.com

MACDONALD HOAGUE & BAYLESS

*/s/ Katherine C. Chamberlain*

KATHERINE C. CHAMBERLAIN

OSB #042580

(206) 622-1604

Of Attorneys for Plaintiff Prison Legal News