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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

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

Plaintiff,

v.

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

Defendants.

No. CV 12-71-SI

DECLARATION OF NATALIYA  
MIKHAYLOVA

DECLARATION OF  
NATALIYA MIKHAYLOVA (CV 12-71-SD) - 1

I, Nataliya Mikhaylova, declare as follows:

1. I am over the age of 18 and I am competent to testify. The statements of fact contained herein are based on my personal knowledge.
2. I am a close friend of Eric Wilcoxson, who has been incarcerated in the Columbia County Jail since December 2010. Our families know each other well. I have four sisters and consider Eric to be my "older brother." He has always been there to talk with me about personal matters, relationships in my life, and things that happen with my family.
3. Eric told me about the Postcard-Only Policy at the Columbia County Jail. I have tried to communicate with Eric by postcard, but it has been difficult to do so.
4. I must send multiple postcards at one time due to the size limitations of the postcards. Also, I must number the postcards ("1 of 4" etc.) so that Eric knows the order he should read them, otherwise my message would not make sense. I have also received multiple postcards from Eric, but the postcards do not always arrive on the same day or in any kind of order. It can take several days before I receive all the numbered postcards from Eric so I can read them in the order that he wrote them and understand his full message to me.
5. I believe that the Columbia County Jail did not deliver postcards that I sent to Eric and that Eric sent to me from Jail. It has been difficult for us to figure this out, because so much time passes before we can discuss it and there may or may not be other postcard communications in the meantime. For example, on February 21, 2012, I spoke with Eric on the telephone. He told me he sent me postcards approximately two months ago, and wondered why I never responded. He told me that he later learned the Jail did not mail the postcards he wrote to me. The Jail never sent me a notice that it did not send his postcards to me.
6. It takes me approximately one hour to drive to the Columbia County Jail to visit Eric. Visiting days/times vary depending on the Pod he is assigned to. I attend school and I work, so I am not able to visit Eric very often because of my schedule and the cost of the commute from my home to the Jail. Additionally, Eric has recently been in segregation, which

means I cannot visit him at all. This makes our written communication that much more important.

7. Because of the lack of privacy with postcards, I don't feel I can write to Eric about personal matters, relationships in my life, and things that happen with my family.

8. Columbia County Jail's Postcard-Only Policy has severely limited my ability to communicate in writing with Eric. I really miss the presence of my "big brother" in my life, and the advice and opinions he has always had for me.

I declare under penalty of perjury of the laws of the United States of America and the State of Oregon that the foregoing is true and correct to the best of my knowledge.

DATED this 1 day of March 2012, at Cornelius, Oregon.

Nataliya Mikhaylova  
Nataliya Mikhaylova

**CERTIFICATE OF SERVICE**

I hereby certify that on March 6, 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:

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