

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

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

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

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 OANA POPA

I, Oana Popa, declare as follows:

1. I am a friend of Eric Wilcoxson, who is incarcerated in the Columbia County Jail. Eric was my best friend at the time he went to jail.

2. Eric was incarcerated at the Multnomah County Jail in downtown Portland before he was transferred to the Columbia County Jail. I used to write letters to Eric when he was at the Multnomah County Jail.

3. The last letter I sent to Eric at the Multnomah County Jail was returned to me because he had been transferred to the Columbia County Jail. After I learned this, I sent the same letter to the Columbia County Jail, but the Jail censored my letter and returned it to me. The Jail did not tell me why it rejected my letter. I called Eric's mother and asked her if Eric can receive letters at the Columbia County Jail. She told me that the Jail will only allow me to send him postcards.

4. I am not able to write much on a postcard, so I usually send three postcards at once. I number the postcards so Eric can read them in order. It also takes me more time to communicate by postcard, because I can't type on a postcard and must write by hand. It is difficult to find postcards because not very many retail stores sell them. Sending multiple postcards is more expensive for me than sending one letter. I used to send Eric postcards several times per month, but the Columbia County Jail's restrictive Postcard-Only Policy is such a hassle, I only send him postcards about once a month now.

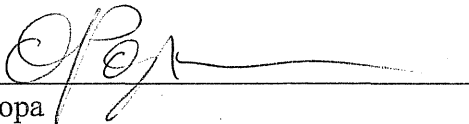
5. Because of the Jail's restrictive Postcard-Only Policy it is really hard for me to keep in touch with Eric about what is happening in my life.

6. My work schedule makes it difficult for me to visit Eric in person. I must drive over one hour from my home to the Columbia County Jail. Each Pod at the Columbia County Jail has different days/times for visitation. The last three times I tried to visit Eric, Jail staff told me was moved to another Pod, and therefore, I could not see him.

7. I have not seen Eric in over three months because of the three unsuccessful times I tried to visit him and because he has been in segregation and is not allowed to have visitors. I can only communicate with him in writing, and the Jail's restrictive Postcard-Only Policy makes this extremely hard 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 29 day of February, at Portland, Oregon.



Oana Popa

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:

- **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