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[Additional counsel to appear on signature page]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

STATE OF OREGON, et al.,
Plaintiffs

v.

DONALD TRUMP, in his official capacity as
President of the United States, et al.,
Defendants.

Case No. 3:25-cv-01756-IM

PLAINTIFFS' WITNESS LIST

State of Oregon

The State of Oregon intends to call the following witness in Plaintiffs' case-in-chief:

1. Captain Cameron Bailey (30 minutes of direct testimony)

The State of Oregon may also call the following witnesses in its case-in-chief:

Camilla Wamsley, Inspector Will Turner, and Major General Timothy L. Rieger. However, Plaintiffs anticipate designating deposition transcript of these witnesses in lieu of their live testimony; those transcripts are admissible as statements of party-opponents (*see* Federal Rule of Evidence 801(d)(2)). Plaintiffs anticipate withdrawing these witnesses upon taking of the depositions and filing of the Parties' joint exhibit list.

The State of Oregon does not intend to call Robert Cantu in its case-in-chief in reliance on Defendants' representation that they will call Mr. Cantu as a witness in their case-in-chief.

City of Portland

The City of Portland intends to call the following witnesses in Plaintiffs' case-in-chief:

1. Commander Franz Schoening (2 hours of direct testimony)
2. Commander Brian Hughes (2 hours of direct testimony)
3. Lexa O'Halloran (30 minutes of direct testimony)

The City of Portland may call the following witnesses in Plaintiffs' case-in-chief: Assistant Chief Craig Dobson (1 hour of direct testimony) and Lieutenant Jessica Ruch (30 minutes of direct testimony).

State of California

The State of California does not intend to call witnesses in Plaintiffs' case-in-chief.

Plaintiffs' Witnesses Regarding Foundation for Admissibility of Exhibits

The State of Oregon may also call a member of Oregon Department of Justice staff in its case-in-chief only if it is necessary to authenticate exhibits (e.g., PDFs of government websites).

The City of Portland may also call additional city employees in its case-in-chief only if it is necessary to establish the admissibility of exhibits, such as the exhibits attached to ECF 12,

33, 45, 46 and similar documents produced in discovery. A list of such potential witnesses have been provided to Defendants' counsel.

Plaintiffs anticipate withdrawing all authenticity witnesses promptly upon the filing of the parties' joint exhibit list on October 24.

DATED October 17, 2025.

Respectfully submitted,

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