

July 26, 2018

Paul Erlebach, Superintendent  
Neak-Kah-Nie School District #56  
PO Box 28  
Rockaway, OR 97136

Re: *Linn County et al. v. State of Oregon, et al.*  
Linn County Circuit Court Case No. 16-cv-07708

Dear Class Member:

As you are likely aware, Linn County has, for several years, been waging a class action case against the State of Oregon seeking approximately \$1.4 billion for breaching a contract it alleges exists between the Forest Trust Land Counties and the state for management of and revenues from forest lands previously owned by those counties. Our class action lawsuit, *Linn County v. State of Oregon*, Case No. 16-cv-07708 also alleges that your organization, as a member of the class is entitled to a share of any overall damages recovery. I am addressing this to you in my capacity as class counsel and because your organization is a member of the class.

The circuit court has made a series of rulings in this case culminating with its denial of the state's motions for summary judgment and its denial of the state's motion for an interlocutory appeal. It now appears that the case is headed to trial before a jury to be impaneled in Linn County, likely sometime during the first half of next year.

In light of our proximity to trial, Commissioner Roger Nyquist, Chair of the Board of Commissioners of Linn County, and I thought it might be useful to convene a series of local meetings of our class members to bring you up to date on our progress (including a review of the rulings which have already been made by the court) and to place you in a position to be conversant with the issues which will be resolved at trial. We have also created a board of advisors consisting primarily of the county attorneys from each of the Forest Trust Land Counties which are also members of our class. Bill Sargent, County Counsel for Tillamook County, is a member of our Advisory Council and will be in attendance at our local meeting.

We have scheduled our local meeting for Tillamook County class members for Tuesday, September 11, 2018, at 1:30 p.m. at the Tillamook County Courthouse, Conference Room A on the second floor. The address of the courthouse is 201 Laurel Avenue, Tillamook, Oregon 97141.

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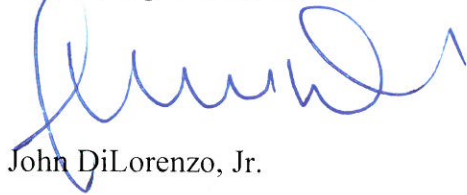
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We hope you will be able to send a representative to our meeting to learn more about where we have been and what to expect as our case proceeds. We would appreciate you letting us know whether you will be able to send a representative by contacting my assistant, Malinda Quirante, by email. Malinda's email address is [malindaquirante@dwt.com](mailto:malindaquirante@dwt.com).

Thank you for your time and consideration of our invitation. We hope to meet you or your representative in person on September 11 and look forward to a helpful discussion.

Very truly yours,

Dayis Wright Tremaine LLP

A handwritten signature in blue ink, appearing to read "John DiLorenzo, Jr.", written over the typed name below.

John DiLorenzo, Jr.

JAD/mq

cc: Commr. Roger Nyquist  
William K. Sargent, County Counsel