

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

ROWE DIVISION

JERSEY JACKSON, an individual,

Plaintiff,

v.

MARLOWE NAVARRO, in Navarro's
official capacity as an officer of the Rowe
Police Department,

Defendant.

Case No. 3:20-cv-00101-CC

STIPULATIONS

Plaintiff Jersey Jackson ("Jackson") and Defendant Marlowe Navarro ("Navarro") hereby stipulate and agree to, and respectfully request that the Court enter and order reflecting, the following:

1. The Rowe Police Department had the lawful authority to order the dispersal of the individuals at the Digby Theater on January 15, 2020, and to arrest those individuals who refused to disperse following two (2) clear verbal warnings.

2. The parties each have conducted reasonable searches and, save for Exhibit 3, have located no pertinent audio or video of the events that occurred at the Digby Theater on December 20th, 2019 and January 15, 2020.

3. Navarro is not entitled to qualified immunity on any of Jackson's claims.

4. During testimony, no witness will be entitled to assert any right against self-incrimination, whether arising under the Fifth Amendment to the United States Constitution, Article I, Section 1, Clause 12 of the Oregon Constitution, or otherwise.

5. The first phase of the trial shall deal with Navarro's potential liability only. If necessary, a determination as to damages and any other relief to which Jackson may be entitled will be made in a separate proceeding.

6. All exhibits included in the following case materials are authentic. All signatures on witness affidavits and other documents are authentic.