

IN THE SUPREME COURT OF THE STATE OF OREGON

ZEFERINO VASQUEZ,

Plaintiff-Respondent, Respondent on Review,

v.

DOUBLE PRESS MFG., INC.,
a California corporation,

Defendant-Appellant, Petitioner on Review.

Supreme Court No. S065574
Court of Appeals No. A154774
Multnomah County Circuit Court Case No. 110302844

OREGON ASSOCIATION OF DEFENSE COUNSEL'S
MOTION TO APPEAR AMICUS CURIAE IN SUPPORT OF DEFENDANT-
APPELLANT PETITIONER-CROSS-RESPONDENT ON REVIEW
AND TO FILE BRIEF ON THE MERITS

The Oregon Association of Defense Counsel (“OADC”) moves the court for an order allowing its appearance as *Amicus Curiae* to file a brief in support of Defendant-Appellant Cross-Respondent on Review Double Press Mfg., Inc.’s answer to plaintiff’s arguments that *Horton* be reconsidered.

OADC is a nonprofit organization for defense-oriented civil litigators whose goals are to provide a unified voice for defense concerns in Oregon, offer networking opportunities, and sponsor continuing legal education. OADC requests leave to appear amicus in this matter to address the issues raised by Plaintiff-Respondent Cross-Petitioner on Review and *Amicus Curiae* Oregon Jury

Project with respect to the holding of this court in *Horton v. OHSU*, 359 Or 168 (2016), concerning Article I, section 17, of the Oregon Constitution. OADC seeks to appear to present its position on the correct rule of law.

The due date for Defendant-Appellant Petitioner-Cross-Respondent on Review's combined answering and reply brief is August 10, 2018. Oral argument is scheduled for September 14, 2018. OADC seeks leave to file the brief on the merits, submitted today, to address the important issues raised regarding the right to trial by jury.

DATED this 9th day of August, 2018.

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s/ Hillary A. Taylor

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CERTIFICATE OF FILING AND SERVICE

I hereby certify that I served the foregoing OREGON
ASSOCIATION OF DEFENSE COUNSEL'S MOTION TO APPEAR
AMICUS CURIAE IN SUPPORT OF DEFENDANT-APPELLANT
PETITIONER-CROSS-RESPONDENT ON REVIEW AND TO FILE
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Of Attorneys for *Amicus Curiae* Oregon Jury Project

by electronic delivery from the Supreme Court of the State of Oregon's e-filing system.

On the same date I filed the foregoing OREGON ASSOCIATION OF DEFENSE COUNSEL'S MOTION TO APPEAR AMICUS CURIAE IN SUPPORT OF DEFENDANT-APPELLANT PETITIONER-CROSS-RESPONDENT ON REVIEW AND TO FILE BRIEF ON THE MERITS with the State Court Administrator, Appellate Records Section by means of the appellate court e-filing system.

DATED this 9th day of August, 2018.

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