

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF DESCHUTES

Case No: 23 CV 2763D

Myntora Aguilar, Michelle Hester, &)
 Nicholas Schindler, Homeless Individuals)
 On Hunnell & Clausen Roads, City of Bend,)
 On Behalf of Themselves & Other Homeless)
 Individuals on Hunnell & Clausen Roads)
 & Charles Hemingway, Homeless Advocate,)
 All Pro Se)
)
)
 v.)
)
)
 Eric King, City Manager, City of Bend;)
 Melanie Kebler, Mayor, City of Bend; Megan)
 Perkins, Mayor Pro Tem & Anthony)
 Broadman, Barb Campbell, Ariel Mendez,)
 Megan Norris & Mike Riley, City Councilors,)
 City of Bend; David Abbas, Director,)
 Transportation & Mobility, City of Bend &)
 Mike Krantz, Chief of Police, City of Bend)

PROPOSED
SETTLEMENT

FILED
CIRCUIT COURT
2023 JUL 17 AM 8:53
DESCHUTES COUNTY
OREGON

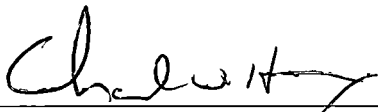
OFFER OF SETTLEMENT

In the spirit of providing equity, justice and humanity for Plaintiffs and in recognition of the Defendant's interest in changing Hunnell and Clausen Roads from a location where unhoused persons congregate outdoors in large numbers living in RVs, trailers and tents, Plaintiffs offer the Proposal:

1. Plaintiffs and Defendants will meet to determine a mutually agreed-upon date by which Hunnell and Clausen will be cleared of existing residents, allowing enough time for service

providers to work individually with each resident on relocation plan. Plaintiff's propose December 31, 2023.

2. Effective August 1, 2023 the numbers of Hunnell/Clausen residents will be frozen. A by-name list of residents in place on that date will be drawn up. No new persons camping or in RVs, cars or trailers will be permitted. Anyone attempting to move onto Hunnell/Clausen after that date will be considered in violation of Time, Place and Manner restrictions and will be issued a Notice to vacate by the City.
3. Once a resident leaves Hunnell/Clausen the resident is not permitted to return.
4. Residents will be provided the opportunity to participate in a relocation program that will be administered by service providers. Any resident not agreeing to participate in the relocation program will be served with a Notice to vacate and will not be eligible to remain on Hunnell/Clausen any longer. Only residents agreeing to participate in the relocation program will be permitted to remain after August 1, 2023.
5. Any registered resident after August 1, 2023 who is charged with a violent crime will be issued an immediate Notice to vacate.
6. Defendants will continue to work to find a place where residents can relocate to.
7. After the agreed-upon closure date the City will re-initiate closure of Hunnell/Clausen and all remaining residents will be given a final date by which they must have moved.



Charles Hemingway, Plaintiff, Pro se
On behalf of Plaintiffs Aguilar, Hester and Schindler