



**SCHWABE, WILLIAMSON & WYATT**  
ATTORNEYS AT LAW

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March 5, 2009

[REDACTED]  
c/o David E. Hull  
720 SW Washington Street, #210  
Portland, OR 97205

Re: Doug and Traci Greenberg  
Our File No.: [REDACTED]

Dear [REDACTED]

I represent Doug and Traci Greenberg. They have retained me to stop a pattern of inappropriate behavior on your part which has continued from time to time for the past 17 months and appears to have escalated recently.

Specific instances of unwanted and threatening conduct include:

- 1) In October, 2007 you called Traci on her work cell phone and told her that she should be careful about dating Doug. [REDACTED]
- 2) In November, 2007 you drove your car threateningly and aggressively toward Traci while she was standing in front of a house Doug and Traci were considering buying. [REDACTED]
- 3) In August, 2008 you sent a negative email to Traci making slanderous accusations about Doug. Traci asked you not to send any more emails and your response was to send another one a few days later with additional slanderous statements.
- 4) In September, 2008 you sent another negative email to Traci about Doug.
- 5) In October, 2008 at a football game, you were pointing and gesturing at Traci and Hannah in a way that was designed to intimidate and threaten them.

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PDX/107005/120124/GR/3452721.1

6) On February 19, 2009, you were parked in their driveway when Traci arrived home from work. [REDACTED]

7) On February 19, 2009, you sent another negative email to Traci. She asked you to stop emailing [REDACTED]

8) On February 20, 2009, you sent another negative email to Traci [REDACTED]

9) You have "jogged by" Doug and Traci's home on multiple occasions and have also driven by their home. [REDACTED]

10) You have initiated and engaged in conversations with Traci's ex-husband, and various friends including the mothers of her children's friends, again for the purpose of stating negative things about Doug and Traci.

Your behavior has to stop. Our first choice is to give you an opportunity to stop engaging in this petty, childish and yet threatening and serious behavior without making it part of the public record. If you do not do so, we will proceed to initiate a request for a stalking order which will be enforced by the appropriate police department if you violate it.

Specifically, you must agree that:

1) You will not make any telephone calls to Traci Greenberg at her work, at her home, or on her cell telephone.

[REDACTED]

3) You will not send any letters, emails or packages to Traci Greenberg.

4) At public events, you will not stare, point or gesture at Traci Greenberg or her children or do anything else which would cause a normal person to be alarmed, threatened or concerned.

[REDACTED]

6) You may not drive or jog by Doug and Traci's [REDACTED]

7) You will not contact Traci's former husband or any of Doug and Traci's friends for the purpose of stating negative or threatening things about either of them.



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As I stated previously, your conduct must stop immediately. If it does not, Doug and Traci will file an action to obtain a stalking order and a permanent injunction preventing continuation of your conduct. The injunction will be a permanent public record and all state and local police departments will have a copy of it in their file so that it will be enforced promptly.

I encourage you to discuss this with your personal attorney so that you may be fully advised of the seriousness of your actions.

Very truly yours,

SCHWABE, WILLIAMSON & WYATT, P.C.



Gary Roberts

GR:dc

cc: Doug and Traci Greenberg (via email)  
Peter Bunch (via email)