

Stephen T. Janik, OSB #741538  
Jack L. Orchard, OSB #721888  
[sjanik@balljanik.com](mailto:sjanik@balljanik.com)  
[jorchard@balljanik.com](mailto:jorchard@balljanik.com)  
Ball Janik LLP  
101 SW Main St., Ste. 1800  
Portland, OR 97204-3219  
(503) 228-2525  
Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

PORTLAND GENERAL ELECTRIC  
COMPANY, an Oregon corporation,

Plaintiff,

v.

STATE OF OREGON, by and through  
THE OREGON DEPARTMENT OF STATE  
LANDS, and +/- FIVE ACRES OF  
UNIMPROVED LAND ALONG THE  
WILLAMETTE RIVER NEAR WEST  
LINN, OREGON,

Defendant.

Case No.: 3:22-cv-00533-SB

**DECLARATION OF PATRICK  
GAYLORD IN SUPPORT OF  
PORTLAND GENERAL ELECTRIC  
COMPANY'S RESPONSE TO GRAND  
RONDE MOTION FOR INTERVENTION**

I, Patrick Gaylord, declare as follows:

1. I am an Oregon licensed surveyor, License No. 2767.
2. I was retained by PGE to prepare a legal description of certain areas of the

Willamette River bank and related rock outcroppings for purposes of PGE filing a condemnation  
action.

1- DECLARATION OF PATRICK GAYLORD IN SUPPORT OF PORTLAND GENERAL  
ELECTRIC COMPANY'S RESPONSE TO GRAND RONDE MOTION FOR INTERVENTION

3. PGE filed an action in U.S. District Court, Case No. 3:22-CV-00533 and attached to that Complaint as Exhibit B is the metes and bounds legal description that I prepared.

4. The metes and bounds legal description identifies the boundary line between the property to be condemned and property owned by the Confederated Tribes of Grand Ronde as follows: "...and being bounded as follows: ...On the right bank on the north by the south line of that tract of land granted to the Confederated Tribes of Grand Ronde deed Document No. 2019-048467, Clackamas County Deed Records". The purpose of this reference to the above-described Deed was to exclude from the area being condemned any portion of the land owned by the Confederated Tribes of Grand Ronde.

*I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.*

DATED: June 10, 2022

/s/ Patrice Gaylord  
Patrick Gaylord