

July 8, 2009

VIA E-MAIL

IRA D. GLICK, M.D.
PROFESSOR OF PSYCHIATRY & BEHAVIORAL SCIENCES

Re: Estate of James Chasse Jr. v. Christopher Humphreys et al.
USDC No. 07-189 HU
Risk Mgmt No. G2007-0094-01 MS

Dear Dr. Glick:

This letter is to confirm your agreement to assist the City of Portland and its employees in the above-captioned litigation filed in the United States District Court for the District of Oregon.

This suit stems from an incident which occurred on September 17, 2007, when two Portland Police officers and a Multnomah County Deputy Sheriff came into contact with James Chasse, Jr. The officers observed Chasse urinating in public, and due to his body posture believed Chasse may have injected drugs into his hand. Chasse had the outward appearance of a transient and was dressed in filthy clothing with urine and feces in the material. The officers called out to Chasse who looked in their direction and immediately began to run. A short foot pursuit followed and one of the officers caught up to Chasse and knocked him forward causing Chasse to fall to the pavement. During Chasse's fall to the pavement, Officer Humphreys lost his footing and tumbled and fell on Chasse. Chasse was very thin, approximately 5'9" and 145 lbs. Officer Humphreys was approximately 230 lbs and his uniform and duty belt added another 20 lbs.

After a strenuous struggle Chasse was cuffed and placed on his side. The Officers called EMTs to the scene thinking Chasse may have been unconscious after the struggle. EMTs checked Chasse's vital signs which were determined to be within normal limits. Chasse was then taken to the Multnomah County Detention Center [jail] approximately 1 mile from the scene. At the jail Chasse may have lost consciousness and an in-take nurse examined him and she refused to admit him to the facility. Chasse was carried to a police car and driven to Portland Adventist Hospital. While in route the officers saw Chasse slumped in the back seat of the vehicle. The officers pulled off the freeway at the first exit, removed Chasse from the vehicle and immediately began

Dr. Ira Glick
July 8, 2009
Page 2

CPR. EMTs arrived and took Chasse via ambulance to the Portland Adventist Hospital where ER failed to revive him.

The State Medical Examiner lists Blunt Force Trauma as the cause of death. The autopsy revealed numerous fractured ribs, bruised, abrasions and internal bleeding [300 ml] in the chest cavity.

Chasse had a longstanding history of Schizophrenia. Chasse had not been taking his medication and was living alone in deplorable circumstances involving body waste. We believe Chasse, age 42, had limited family contact even though family lived in the area. The local mental health outpatient program likewise had limited involvement/treatment for Chasse's Schizophrenia.

Your assistance is sought as an expert witness to:

1. Review a file that consists of psychological records, medical records, the autopsy, deposition testimony and statements given to the Portland Police from eye witnesses and officers involved.
2. Assist our office with interpreting the records we have received.
3. Assist our office with analyzing and explaining Chasse's strength, willingness and ability to fight the three police officers.
4. Provide insight into how pain affects an individual diagnosed with Schizophrenia when the individual is not taking medication.
5. Provide analysis with respect to Chasse's relapse from his prescribed medication.
6. Provide analysis regarding how family contact, or lack thereof, impacts an adult afflicted with Schizophrenia.
7. Provide additional background information and opinions on matters you discover during the file review.
8. To testify at trial if the opinions you arrive at help the jury to understand the series of events. The trial is set to commence on April 28, 2008. The defendants' case would commence some time in early May.

Your professional fee for working on this matter is \$600 per hour and the City defendants agree to compensate you accordingly.

Dr. Ira Glick
July 8, 2009
Page 3

Please advise me regarding your willingness to assist the City defendants with this litigation. I believe your background as a practicing Psychiatrist in academics and research in the field of Schizophrenia would be most helpful to providing guidance to the lawyers and educating the jury on the topics in this litigation.

Sincerely,

/s/ James G. Rice

James G. Rice
Deputy City Attorney

JGR:plk

c. Mark Stairiker
Mike Hefley