

Paul Carlos Southwick (OSB 095141)
TRIAL ATTORNEY
Religious Exemption Accountability Project
Paul Southwick Law, LLC
8532 N. Ivanhoe St. #208
Portland, OR 97203
Email: paul@paulsouthwick.com
Phone: 503-806-9517

Timothy R. Volpert (OSB 814074)
Tim Volpert PC
2111 NE Hancock St. Ste. 2B
Portland, OR 97212
Email: tim@timvolpertlaw.com
Phone: 503-703-9054

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION**

Elizabeth HUNTER; et al., on behalf of)
themselves and all others similarly situated,)
)
) Plaintiffs,)
)
) v.)
)
) U.S. DEPARTMENT OF EDUCATION and)
) Suzanne GOLDBERG, in her official capacity as)
) Acting Assistant Secretary for Civil Rights,)
) U.S. Department of Education,)
)
) Defendants.)

Case No. 6:21-cv-00474-AA
**DECLARATION OF AUDREY
WOJNAROWISCH IN
SUPPORT OF
MOTION TO AMEND
MOTION FOR
TRO/PRELIMINARY
INJUNCTION**

I, Audrey Wojnarowisch, declare:

1. I am over 18 years of age and have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.
2. I am a current student at George Fox University, a religiously affiliated university in the small rural town of Newberg, Oregon. I am beginning the school year in a divisive climate. George Fox is part of the local Newberg Friends Quaker church, which just split a few years ago, divided around the issue of acceptance or lack thereof of LGBTQ+ individuals.

3. Since the case was filed, some students and faculty have reached out to express support, but many have displayed a sudden coldness towards me. I anticipated this to some degree, as I know other students who have come out publicly and had similar experiences. We have become microcelebrities. From queer and queer positive students, we are met with affirmation, as they thank us for helping them to feel safer in their own community. From others, we are greeted with stares and glares, treated like a zoo animal in our own spaces. It can make campus feel very hostile, and I am constantly on guard about who is in the room with me and when.
4. The experience of walking into a room and feeling like I have to assess who is around and what my level of safety is are feelings of paranoia that accompany the trauma of my sexual assault.
5. I have been on the front page of the local newspapers and I am often approached at work where I serve tables, as people ask me personal questions about my life and the case. The spotlight is strong on me wherever I go.
6. The Newberg school district just banned pride and BLM flags from all local public schools. Protests are taking place all over town, ultimately alternating between LGBTQ+ prides, Proud-Boys who gather, and counter demonstrations either for or against the activism that I have become the face of.
7. I am eager to begin my senior year but I am nervous about the potential repercussions of going back to campus. Any situation where my physical safety may genuinely be at risk is nerve wracking. I weigh the pros, cons, and potential risks of attending campus events and LGBTQ community groups before I attend. My mental health has absolutely suffered because of these concerns.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 24th day of August, 2021.

By: s/AudreyWojnarowisch
Audrey Wojnarowisch