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5 **IN THE CIRCUIT COURT FOR THE STATE OF OREGON**  
6 **FOR THE COUNTY OF CLACKAMAS**

7 NANCY POWELL,

8 Plaintiff,

9 v.

10 MICHAEL F. BAGGETTA,

11 Defendants.

CASE NO.

COMPLAINT  
(Conversion)

Filing Fee: \$252  
(ORS 21.160(1)(b))

DEMAND: \$45,000; specific performance

SUBJECT TO MANDATORY  
ARBITRATION

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15 PLAINTIFF, Nancy Powell, brings this complaint against DEFENDANT, Michael F. Baggetta,  
16 by and through her attorney, William J. Macke & Associates, 4411 NE Tillamook St. Portland,  
17 OR 97213.

18 **Claim I -- Conversion**

19 1.

20 In the late 1990s Richard Powell loaned two national parks posters to Michael Baggetta  
21 for an archiving project Baggetta represented he was conducting.

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23 In late 2014, Mr. Powell contacted Baggetta to inquire as to the status of the prints.  
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3.

In a letter dated January 20, 2015, Baggetta represented that he had donated the prints to the National Park Archives in Harper's Ferry, consistent with prior directions from Mr. Powell.

4.

Thereafter, Mr. Powell passed away leaving his property, including rights to the prints, to Mrs. Powell.

5.

Ms. Powell contacted the National Park Archives and received information that there was no record of the prints having been donated.

6.

Baggetta wrongfully exercised dominion and control over the prints depriving Mrs. Powell of their entire value, alleged at \$45,000.

**WHEREFORE plaintiff prays as follows:**

- 1) For Judgment against Baggetta ordering Baggetta to return the prints, otherwise, for judgment in the amount of \$45,000;
- 2) For reasonable costs and fees; and
- 3) For whatever other remedies the court finds just and reasonable.

Dated: \_\_\_\_\_

WILLIAM J. MACKE & ASSOCIATES

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William J. Macke, OSB #091793  
Attorney for Plaintiff  
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