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

7 DOUG LEEN

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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14 PLAINTIFF, Doug Leen, brings this complaint against DEFENDANT, Michael F. Baggetta, by
15 and through his attorney, William J. Macke & Associates, 4411 NE Tillamook St. Portland, OR
16 97213.

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18 **Claim I -- Conversion**

19 1.

20 In the late 1990s Richard Powell loaned two original Don Powell (his father) National
21 Parks posters to Michael Baggetta for an archiving project Baggetta represented he was
22 undertaking.

23 2.

24 In late 2014, Richard 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 Richard Powell.

4.

Thereafter, Richard Powell passed away leaving his property, including rights to the prints to his wife, Nancy Powell.

5.

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

6.

Nancy Powell transferred the rights to the prints to Doug Leen.

7.

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

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WHEREFORE plaintiff prays as follows:

- 1) For Judgment against Baggetta ordering Baggetta to return the prints to Leen for donation to the National Parks Archives, 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

William J. Macke, OSB #091793
Attorney for Plaintiff
william.j.macke@gmail.com