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4 IN THE CIRCUIT COURT OF THE STATE OF OREGON
5 FOR THE COUNTY OF MARION

6 BRUCE STARR,

7 Plaintiff,

8 v.

9 KATE BROWN, Secretary of State of the
10 State of Oregon,

11 Defendant.

Case No. 12C13485

DECLARATION OF SCOTT RYDER

ORS 20.140 - State fees deferred at filing

12 I, Scott Ryder, declare as follows:

13 1. I have personal knowledge of the following matters.

14 2. I am the general manager at Ryder Election Services, LLC, ("Ryder") a ballot
15 printing company located in Bend, Oregon. Ryder is a family business that was started by my
16 great grandfather in 1902. Ryder has been printing ballots for Oregon elections since the early
17 1900s. Because Ryder is a family business, I have been around the printing business, and ballot
18 printing, my whole life. I began officially working at Ryder in 1990, as a production employee,
19 and was promoted to my current position in 1993.

20 3. Ryder currently has contracts to create and print elections ballots for 32 of
21 Oregon's 36 counties. The only Counties we do not print ballots for are Yamhill, Curry,
22 Clackamas, and Marion.

23 4. Printing ballots for the counties is a multi-step process. The counties provide us
24 with the information that has been certified for the ballot by the Secretary of State. We design a
25 sample ballot, and work with the County to format and arrange the ballot to their specifications.
26 This typically involves at least one, and often multiple, rounds of samples and proofs. Designing

1 each County's ballot using the ES&S system, including the back-and-forth with the counties,
2 takes approximately 15 hours per County. Each County has a different ballot, and there are often
3 multiple ballot styles (listing races specific to a particular district in the County) per County. We
4 bill each County individually for their ballot design and printing costs.

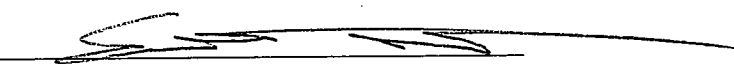
5 5. Ryder creates all election ballots for its 32 counties using software from a
6 company called Elections Systems & Software (ES&S). Ryder has been using the ES&S system
7 since 1991, and I have worked on generating and printing ballots using the ES&S system since
8 that time. Ryder is the only certified ES&S printer in Oregon. Being a certified ES&S printer
9 means that we are licensed to use the ES&S software to design ballots for our client County
10 clerks. We then print those designs using our printing presses.

11 6. In order to get the ballots to the counties in order to meet the March 31st deadline
12 for mailing ballots to overseas and military voters, Ryder has already started printing ballots.
13 We have completed printing ballots for 9 counties, and have another 16 counties lined up in the
14 print queue. Any delay in the process at this point will make it impossible to have the ballots
15 printed in time to meet the March 31st deadline.

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

19 DATED March 20, 2012.

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Scott Ryder
General Manager, Ryder Election Services