

**25CV08937 MANGUM/OR BOARD TAX PRAC**

13 messages

Karpinski Seth T

Apr 17, 2025 at 12:

Ms. Healy,

Thank you for your email this afternoon regarding the pending motion for a preliminary injunction. We intend to file an opposition to the motion. However, we will request a two-week extension of time to do so for the reasons set forth below.

Neither I, our General Counsel attorney, nor our client have seen these motion papers until you provided them today. Over the past month, I have had a few exchanges with Mr. Mangum and he has written various emails to the Board with no mention of this pending preliminary injunction motion. That said, I understand that this motion and the related papers were filed on March 3, and they appear to have been served on our main office that day. I am unable to determine why the moving papers did not make it to either the General Counsel attorney or me, when the case was ultimately assigned to me. In addition, I am not sure why I overlooked the motion papers in the court's online (OECI) register of actions. That was a mistake on my part.

I have copied Mr. Mangum on this email and will reach out to him tomorrow regarding a possible extension of time to respond to the preliminary injunction motion. I will advise the court of Mr. Mangum's position in any filing we submit to extend time for a response.

Mr. Mangum filed another action against the Oregon Board of Tax Practitioners over a public records request. The second complaint, 25CV16660, is currently pending before Judge Queen. Notably, Mr. Mangum seeks this same injunction ("prohibiting [the Board] from requiring licensure for tax preparers with no physical presence in Oregon") as part of his prayer for relief in the public records case. See Complaint in Case No. 25CV16660, Section VI.C., p. 5. No preliminary injunction motion has been filed in the public records case.

Thank you for contacting me regarding the overdue response to the motion. I apologize to the court and Mr. Mangum for our delay.

Seth Karpinski

Seth T. Karpinski

Senior Assistant Attorney General | Trial Division | Civil Litigation Section

Oregon Department of Justice

From: Mitzi

ent: Wednesday, April 16, 2025 4:02 P

o: Karpinski Seth T

Mr. Karpinski- this case appears on my aging report following Plaintiff *Pro Se*'s Motion for Preliminary Injunction, filed 3/3/25. As a courtesy, I've attached those documents for you. Proof of Service appears to show the AG's agent was served 3/5/25.

Judge Bennett would like to know if you intend to respond, or shall he grant the motion? Please advise before Noon Friday, 4/18/25.

Best,

Mitzi Healy


Judicial Assistant

Honorable Channing Bennet

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3 attachments

 Motion - Preliminary Injunction - MOPI.pdf
195K

 Memorandum - Support Motion - MMSM.pdf
349K

 Exhibit - EB.pdf
2204K

Mitzi Healy
Karpinski Seth

Apr 17, 2025 at 9:48

All: Judge Bennett has reviewed this email and the case that was assigned to Judge Queen, and these are my directives:

Mr. Karpinski's request for 2 weeks to response to the motion for preliminary injunction is GRANTED. Any objection by Plaintiff *Pro Se* is noted.

Under our local business process regarding "assigned first in time/one family, one judge", the case that was assigned to Judge Queen should have automatically been assigned to Judge Bennett. Given that it was not, I am pulling it, and the case will be assigned to Judge Bennett by end of day. Please consider this email your official Notice of his judicial re-assignment to 25CV16660.

Per Judge Bennett, Mr. Karpinski's objection to preliminary motion is due by end of day 5/2/25. I further assume oral argument will be requested and that parties can argue this in 90 minutes or less. I have time:

May 2 at 1:30p

May 5 or 7 at 9/9:30/10/10:30a OR 1:30p

Everyone appears in person. Please let me know what works.

For Mr. Magnum's benefit: unrepresented parties are not to use my email for the submission of documents, requests, or replies, or to file pleadings in their case. Because Mr. Karpinski added you to my email string, you may reply regarding preference for hearing date only. All other communications must be done in writing, filed conventionally [paper form] or via eFile as our local business dictates.

Thank you.

Best,

Mitzi Healy

Judicial Assistant

Honorable Channing Bennet

Mitzi Healy

Apr 17, 2025 at 10:37

All: My apologies.

I spelled Mr. Mangum's last name wrong.

And May 2 is NOT a valid date for hearing.

These are valid dates/times:

May 5 or 7 at 9/9:30/10/10:30a OR 1:30p

May 8 at 1:30p