

C-6

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

ELIZABETH DIANE DOWNS )  
 )  
 Petitioner, )  
 )  
 v )  
 )  
 ROBERT SCHIEDLER, Superintendent )  
 Oregon Womens Correctional Ctr.)  
 )  
 Defendant. )

No. 87-C-11753  
AFFIDAVIT  
VIRGINIA ANDRESEN

STATE OF OREGON )  
 ) ss.  
County of Marion )

I, Catherine Conrad, being first duly sworn on oath depose  
and say:

That I am the law clerk for Petitioner's Post Conviction  
Attorney in the above entitled action.

I called Mrs. Andresen at 6:20 on December 9, 1990 and told  
her who I was. I had tried to see her in person at her Junction  
City address but found she had moved and not left a forwarding  
address. I went to Jack Shannon's address at 94825 Hwy 99W and  
spoke with a couple of her children who gave me her address as  
2032 Ohio. I told Mrs. Andresen that I had spoken with Mark and  
Martha and that Mark had confirmed the picture incident while  
Martha had denied any knowledge. Mrs. Andresen told me that  
Martha had told her that she had seen the picture Christie drew  
of the person who shot her but "may or may not want to talk about  
it". Mrs. Andresen told me that Christie and Martha went to

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1 school together and were close. She repeated that it wasn't true  
2 that Martha didn't know what I was talking about but "that she  
3 was into protecting Christie". They'd talked about what she  
4 should do and said she'd only tell us if she talked to Christie  
5 first but they hadn't seen each other since 6th grade. I said  
6 "so what she told me yesterday wasn't true then and she said no."

7 I asked her what Martha had told her about the picture-at  
8 first all she said to me was that Martha told her she'd seen a  
9 picture. When pressed she said "I guess it was a man".

10 I make this affidavit in support of Petitioner's Post  
11 Conviction attached Statement of Facts as ordered by the Court.

12  
13 Catherine Conrad  
Catherine Conrad

14 Subscribed and Sworn to before me this 7<sup>th</sup> day of January, 1991.

15  
16 Atty. H. H. H.  
Notary Public for Oregon  
My Commission expires: 12/3/91