

STATE OF MAINE
CUMBERLAND, ss

SUPERIOR COURT
CIVIL ACTION
DOCKET NO.

PORTLAND REGIONAL CHAMBER OF)
COMMERCE; ALLIANCE FOR ADDICTION)
AND MENTAL HEALTH SERVICES, MAINE;)
SLAB, LLC; NOSH, LLC; GRITTY)
MCDUFF’S; and PLAY IT AGAIN SPORTS)

Plaintiffs)

v.)

CITY OF PORTLAND; and)
JON JENNINGS, in his official capacity as City)
Manager for the City of Portland,)

Defendants)

**AFFIDAVIT OF PLAY IT AGAIN
SPORTS IN SUPPORT OF JOINT
MOTION FOR RELIEF FROM
COURT ORDERS RELATED TO
COVID-19, FOR AN EXPEDITED
SCHEDULE, AND FOR RELIEF
FROM MANDATORY ADR
PURSUANT TO M.R. CIV. P.
16B(b)(9)**

I, Scott Rousseau, being first duly sworn, state as follows:

1. I am the Owner of Play It Again Sports of Portland, Maine (“PIAS”). PIAS is the assumed name of Viscount Sporting Goods, Inc., a Maine Business Corporation organized under the laws of the State of Maine, with its principal place of business at 315 Marginal Way, Portland, County of Cumberland, State of Maine.

2. I make this affidavit based on my own personal knowledge, including based on my review of PIAS’s business records.

3. As owner of PIAS, I have custody of or access to such records. It is PIAS’s regular practice to make such records, and such records are kept in the regular course of PIAS’s business. The records are made at or near the time of the acts, events, or conditions referenced therein by persons with actual knowledge or from information transmitted by persons who have actual knowledge, kept in the course of PIAS’s regularly conducted business, and it is PIAS’s regular practice to keep such records.

4. PIAS employs thirteen part-time Employees who are high school and college students working to gain employment experience and obtain money to pay for their education.

5. As a direct result of the requirement that PIAS increase the hourly rates of pay as required by the Emergency Provision of the Minimum Wage Ordinance as amended by the Initiative, PIAS will lay off at least seven and possibly eight of its thirteen part-time Employees on or shortly after December 5, 2020 because of the added cost of operating its business.

Dated: Nov 30, 2020



Scott Rousseau
Owner
Play It Again Sports

STATE OF MAINE
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Personally appeared before me the above-named Scott Rousseau, Owner of Viscount Sporting Goods, Inc., d/b/a Play It Again Sports, and made oath that the above-stated facts are true based upon his personal knowledge as described above.

Dated: 11/30/2020



Notary Public
My commission expires:

DENISE M. PLOURDE
Notary Public, Maine
My Commission Expires April 1, 2021