

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 SLAB, LLC 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, Matthew Moran, being first duly sworn, state as follows:

1. I am an owner of Slab, LLC (“Slab”). Slab is a limited liability company organized under the laws of the State of Maine operating a restaurant business at 25 Preble Street, Portland, County of Cumberland, State of Maine.

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

3. As an owner of Slab, I have custody of or access to such records. It is Slab’s regular practice to make such records, and such records are kept in the regular course of Slab’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 Slab’s regularly conducted business, and it is Slab’s regular practice to keep such records.


4. As a direct result of the requirement that Slab increase the hourly rates of pay as required by the Emergency Provision of the Minimum Wage Ordinance as amended by the Initiative, Slab is highly likely to discontinue all on-site dining and offer only curbside pickup on or shortly after December 5, 2020 because of the added cost of operating its business.

5. As a direct result of eliminating on-site dining, Slab will lay off three kitchen staff Employees.

6. As a direct result of eliminating on-site dining, Slab will lay off four Service Employees.

7. Slab customarily schedules its kitchen staff for overtime but because of the requirement that it increase hourly rates of pay as described above, Slab will eliminate all opportunity for overtime rather than pay \$27.00 per hour as would be required.

Dated: 12/1/20



Matthew Moran
Owner
Slab, LLC

STATE OF MAINE
CUMBERLAND, SS

Personally appeared before me the above-named Matthew Moran, Owner of Slab, LLC, and made oath that the above-stated facts are true based upon his personal knowledge as described above.

Dated: 12/1/2020



Notary Public
My Commission Expires:

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