

SUPERIOR COURT OF WASHINGTON
IN AND FOR KING COUNTY

MARTHA SCUDDER, a single individual,
Plaintiff,

vs.

LARRY GALLOWA, a married individual
Defendant

NO.: 04-2-04721-8SEA

DECLARATION OF ROBIN A.
SCUDDER

I, Robin A. Scudder, make the following Declaration under Penalty of Perjury under the laws of the State of Washington:

1. I am over the age of 18, am competent to testify and make this Declaration based on my knowledge of the facts;

2. I left my birds:

a. A pair of Umbrella Cockatoos (Hen wildcaught, Male domestic);

b . A pair of Senegal parrots (Hen wildcaught, Male domestic);

c. Two pairs of Sun Conures (One pair wildcaught, One pair domestic);

d. A pair of Dusky parrots (both domestic);

e. A pair of Red Throated Conures (both domestic);

f. A pair of Goffins Cockatoos (Hen wildcaught, Male domestic);

g. A pair of Rosie Breasted Cockatoos (both domestic);

h. Two pair of Blue Fronted Amazons (both wildcaught);

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DECLARATION OF ROBIN SCUDDER- 1

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- 1 i. A pair of Orange Winged Amazons (both wildcaught);
- 2 j. A pair of Lilac Crowned Amazons (both wildcaught);
- 3 k. A pair of Red Lored Amazons (both domestic);
- 4 l. One single Red Fronted Macaw (domestic but crippled), in the care of Martha Scudder;
- 5 3. I left the above listed birds, on breeder loan, in the care of Martha Scudder and Bob

6 Vincent's farm, on or about the 1st of August, 2002. Breeder loan is a situation that entails
7 breeding and boarding birds, and when the babies hatch, the owner gets half the production of
8 the birds or 1/2 of the babies;

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10 4. On December 27th, 2004, I returned to the State of Washington to take the birds from
11 Martha Scudder and Bob Vincent's care because I received a letter on December 18th, 2004, from
12 Mr. Vincent demanding that I remove my birds, and stating that the birds were no longer on
13 breeding loan. I am now being charged \$1500.00 for the care of my birds, for the time the birds
14 were in the care of Martha Scudder and Bob Vincent at Scudder's Parrot Depot., on breeder loan.
15 It was never in the agreement between Martha and John Scudder Sr., Martha's late husband, that
16 I would be charged for care of these birds. Mr. Vincent took it upon himself to change the
17 original agreement of breeder loan to boarders;

18 5. When I arrived at the farm of Martha Scudder and Bob Vincent on December 27th,
19 2004, some of my birds had been removed from the shelter of the aviary and placed on
20 sawhorses outside, in front of the main house. As I inspected my birds, I found that they were in
21 terrible condition. The cages hadn't been cleaned and feces was piled up high. Many of the birds
22 had no perches, and their food dishes were empty. The birds' feathers were in really bad shape;
23 the feathers did not lay against the body and were dull, not bright as they should be. This was
24 caused from the birds not getting the proper care that they should have, while my birds were in
25 the care of Martha Scudder and Bob Vincent. Over the past couple of years, I have lost several
26 of the pairs of birds, listed above due to the care they received while at the farm;

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2 6. This is a list of the birds that have died since August 2002, while left in the care of
3 Martha Scudder and Bob Vincent at the Scudder's Parrot Depot:

4 2 pair of Red Throated Conures

5 1 pair of Umbrella Cockatoos

6 1 pair of Senegal Parrots and one single female

7 1 pair Sun Conure and one single male

8 No necropsies were ever performed on these birds;

9 7. Due to the care and condition of my birds, they are now in the care of Kathy and John
10 Scudder Jr., and must be quarantined and medicated for 45 days. My birds must be kept separate
11 from the rest of John Scudder Jr's., birds, till the quarantine is complete. The moving of the birds
12 is very stressful, and if they have any condition, the move will bring out any illness, due to the
13 stress of moving them;

14 8. After moving the birds to John and Kathy Scudder's, I had the opportunity to really
15 look at the birds and their cages. My inspection of the nest boxes showed they were horrific.
16 Several of the nest boxes were wet and had mold in them. Others had signs of mice living in the
17 boxes. It was apparent that the nest box material hadn't been changed in quite sometime;

18 9. On several occasions, I have spoken with John and Kathy Scudder and my birds are
19 doing much better now. Their feathers have straightened out and they are starting to look better
20 as the days go by. They are eating well and starting to talk and sing again;

21 10. While I was taking my birds from Martha Scudder and Bob Vincent's farm, I had the
22 opportunity to view the condition of the farm and the other animals including the birds, in Bob
23 and Martha's care. I saw bird cages that were very filthy, and had no perches. I also witnessed a
24 dog kennel with a pair of miniature dachshunds, kept in there for breeding purposes. The kennel
25 where the dogs were kept, appeared to have not been cleaned in months. The feces in the kennel
26 was so deep that the dogs had to walk through it to get anywhere, and the smell was horrible. I

1 mentioned this to Martha Scudder, and she stated that she knew it was dirty and has been going
2 to clean it for sometime;

3 11. Upon going into the home of Martha Scudder and Bob Vincent, I witnessed several
4 10 gallon fish tanks full of mice and babies. The smell in the house was worse than any pet store
5 I had ever been in. There was everything from bird feces to dog urine and feces all over the
6 floor. Cages of baby birds were not cleaned and the birds were not kept in any order;

7 12. Being the animal lover that I am, this made me sick to my stomach. I don't know
8 how anyone could force any animal to live in conditions like this. No animal should have to live
9 in the conditions I witnessed at Bob Vincent's and Martha Scudder's farm.

10 Signed this ____ day of _____, 2005, at _____, Alaska,

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12 Robin A. Scudder
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