

[Annotated at end of document]

**SUPERIOR COURT OF WASHINGTON
IN AND FOR KING COUNTY**

MARTHA J. SCUDDER, A single individual,

Plaintiff,

vs.

LARRY GALLAWA, A married individual, Defendant

Case No.: 04-2-04721-8 SEA

DECLARATION OF MARTHA SCUDDER

I, Martha 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 am retired and I own and operate Scudders Parrot Depot.

3. I have been involved in the animal breeding industry for a majority of my life. My family raised dogs through my youth. My husband and I started raising parrots more than a quarter of a century ago.

4. Shortly after my husband died, a man named Larry Gallawa started to write untrue statements about me and my farm, contacted clients of mine, and he filed some complaints with the Pierce County Humane Society causing them to come to my farm. I have always welcomed the humane society, as well as

1 most anyone who had a need for knowledge about birds. As a result of
2 Gallowa's complaints, Dr. Tracy Bennett came with the humane society to
3 investigate the complaints.

4 5. After the visit I had 7 birds die from being killed by their mates.
5 Interruption of the breeding cycle and loss of production also occurred.

6 6. Dr. Bennett made five recommendations to the Humane Society, which I
7 attempted to implement.

8 7. After following Dr. Bennett's recommendations, the breeding cycle
9 was further interrupted and my breeding production declined to literally
10 nothing.

11 8. It was only because of Dr. Bennett's recommendations, which I
12 believed I had to carry out, that my breeding stock suffered, and I incurred
13 tremendous economic loss, loss of reputation and severe emotional distress.

14 Dated this _____ day of August, 2005.

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16 _____
17 **MARTHA SCUDDER**
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[One of the bases of Mrs. Scudder's suit is financial loss, the other being defamation of character. However—something even difficult for even the lawyers to sort out—is that under examination even in her initial deposition, Mrs. Scudder had vanishingly little knowledge of the most basic aspects of the finances of the farm, let alone of alleged financial losses related to Mr. Gallawa's actions. As the court Record and other documents show, the financial decline of Parrot Depot, and continuing decline of the condition of the parrots there, can far more reasonably be attributed to:

- a decline in husbandry at the farm following the death of Martha Scudder's husband;
- disease, starvation, and exposure to environmental toxins leading to the deaths of birds and loss of eggs—based on the Record and documentation outside the court case;
- a marked increase in family violence—both verbal and physical—directly coinciding with the arrival of Mr. Robert Vincent, as testified to in the Record by members of Martha Scudder's own family.

—*Editors.*]