

[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 ROBERT VINCENT
Operations Manager of Scudders Parrot Depot

I, Robert Vincent, 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 from the United States Navy, I am a Disabled Viet Nam Veteran.

3. I was asked to join the Scudder Farm operation in August, 2003 to help Martha handle some management and logistic concerns.

4. Within two months, Martha had trained me to recognize and understand the unique manner a person must conduct themselves around breeding birds, species identification, and observation techniques useful in determining the health and welfare of the flock.

1 5. During the first or second week, Martha had me read the contents of
2 the observations reportedly written by Dr. Tracy Bennett. Our discussion of
3 the document included the areas of disagreement and further discussion about
4 the suggested recommendations.

5 6. Shortly after my arrival at the farm, I became aware of the web page
6 and e-Mail postings of Mr. Gallawa on the internet. These postings became a
7 concern.

8 7. AT NO TIME Did Mr. Gallawa ever contact myself or Martha Scudder, or
9 visit the farm to verify his allegations.

10 8. Between August and November, 2003 I started to study the impact of
11 the interruption by Dr. Tracy Bennett and the Pierce County Health
12 Department, during the breeding season of the flock. During this time frame,
13 Mr. Gallawa's e-mails and web postings escalated in more false statements and
14 in the number of people and organizations he contacted regarding Martha
15 Scudder and her breeding facility

16 9. In January 2004, the Tacoma/ Pierce County Health Department
17 inspected all breeding houses and drew blood samples from ten breeder birds
18 for testing for the parrot disease Psittacosis. I personally observed mate
19 caused deaths of 7 -8 birds within a week of the inspection. I removed each
20 dead bird because Martha would break down in tears at the sight of each
21 killed bird.

22 10. During an inventory of the breeding flock, I noted an additional
23 six or seven single birds in the breeding houses. When I asked Martha about
24 them, she told me that the birds in question had killed their mates during
25 the two inspections conducted by Dr. Tracy Bennett and the Humane Society.

1 11. Additional review of the farm records indicated that Martha had
2 hatched out and raised 97 chicks in 2002, the year her husband passed away,
3 and that number dropped significantly in 2003 to only 29 chicks in 2003. the
4 years prior to 2002 had some incomplete records, but appeared to be
5 consistent with over 100 chicks a year. In 2004 we limited the inspections in
6 the breeding houses and the number of chicks rebounded to 55. Although the
7 2005 season is not yet complete we anticipate the year total to be between 60
8 and 65.

9 12. It is my understanding the hatch records were copied by the defense
10 and has been at their disposal since summer 2004, defense counsel met at this
11 time with plaintiff for the purpose of rechecking discovery in June 2005.
12 Defense counsel was shown the copies of the hatch books and plaintiff was
13 told that defense was not sure if the records were on file, but defense had
14 not read all of the file yet.

15 13. FOR CLAIRTY I WILL STATE NOW, it is my opinion the current losses
16 due to loss of breeding animals exceed \$100,000.00. The current loss from
17 decreased production will exceed \$100,000.00. Future loss due to reduced
18 production will easily exceed \$200,000.00. The cost of borrowing money
19 against the farm, to make up for the existing losses exceed \$50,000.00. The
20 mental stress, emotional distress, financial distress this has caused Martha
21 in my opinion would exceed \$600,000.00 in the eyes of any reasonable jury.

22 Signed this 5 day of AUGUST, 2005, at ROY, WASHINGTON

23 
24 _____
25 ROBERT L VINCENT

[*EdNote:* Reading Mr. Vincent's Declaration (alongside Martha Scudder's Declaration, just above) gives one a strong sense of who might have driven this law suit and what the motives might have been.

Mr. Vincent arrives on the scene and within two months, is a self-professed expert on the husbandry of breeding parrots. Within a few weeks, he seems to have turned litigious, somehow blaming all declines in the number of hatchlings at the farm since at least 2002 on Mr. Gallawa (but not on the death, for example, of John Scudder, which coincided temporarily with the decline). Data prior to 2002 are not provided nor are data about deaths from diseases—THE core issue—except for the testing of 10 birds for psittacosis (chlamydiosis). Nor is mention made of fights at the Parrot Depot leading to the need for restraining orders against family members (see [Deposition, Kathy Scudder](#)). Nor does Mr. Vincent mention other outsiders allowed to walk through the Farm, details which are clear in court testimony and will be presented on this website. However, Mr. Vincent is sure that all wounds can be healed for a mere... **\$600,000** ...or more. The judge felt that \$0.00 was a more appropriate settlement.

There appears to be a certain transparency here; but if the reader doubts this, read on through the evidence.]