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8 Attorney for Petitioners Elizabeth Hueg, an individual; SAFE Rescue Team, a 501(c)(3) no-profit
9 corporation; Cats in Need of Human Care, 501(c)(3) no-profit corporation

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SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE - CENTRAL

11 Elizabeth Hueg, an individual; SAFE Rescue
12 Team, a 501(c)(3) non-profit corporation; Cats in
13 Need of Human Care 501(c)(3) non-profit
14 corporation,

14 Petitioners,

15 vs.

16 OC Animal Care, OC Community Resources and
17 Does 1-25, inclusive,

18 Respondents.

) Case No.: 30-2022-01282419-CU-
) WM-CJC

) DECLARATION OF DEBBIE ROBIN
) FRIEDMAN IN SUPPORT OF PETITIONERS'
) EX PARTE APPLICATION FOR
) TEMPORARY RESTRAINING ORDER AND
) ORDER TO SHOW CAUSE RE:
) PRELIMINARY INJUNCTION

) Date: November 1, 2022
) Time: 8:45 a.m.
) Place: Dept. C-31

) Honorable Martha K. Gooding

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21 The Declaration of Debbie Robin Friedman is hereby submitted in support of Petitioners' Ex
22 Parte Application for Temporary Restraining Order and Order to Show Cause Re: Preliminary Injunction
23 which is scheduled for November 1, 2022 at 8:45a.m. in Department C-31 of the above-entitled court.

23 Dated: October 31, 2022

23 Respectfully submitted,

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26 M. Taylor Katz, Attorney
27 For Petitioners

28 Dec of M. Taylor Katz in support of Pets' Ex Parte App for TRO and OSC
Re Prelim Injunction

DECLARATION OF DEBBIE ROBIN FRIEDMAN

I, Debbie Robin Friedman declare:

1. I have personal knowledge of the following facts, and if called would competently testify that:
 1. I am an Officer of Cats in Need of Human Care, a California non-profit 501(c)(3) corporation ("Cats in Need", "CIN") and in said capacity am one of the Petitioners herein.
 2. Cats in Need is devoted to the rescue and placement of kittens and cats into homes.
 3. Animal rescue organizations, such as ours, work together with the common goal of helping kittens and cats find homes.
 4. There are three categories of cats with which Cats In Need work:
 - a. Feral. These cats are wild, live strictly outdoors and neither welcome nor seek human contact. Feral cats require capture in order to spay/neuter them (TNR) to reduce their population which unchecked can spread diseases, increase public nuisances, such as spraying, yowling, fighting, going through trash, etc. and reduce the number of kittens that die horrible deaths outside. CIN also arranges for any medical intervention, when necessary;
 - b. Neighborhood Cat. Without a specific home, they roam and live in the neighborhood. Often these cats referred to as "stray" cats are dumped into a neighborhood or left behind. These cats are approachable and welcome human contact; CIN traps them, vet checks, neuters, vaccinates, etc. and places them in loving, permanent homes; and
 - c. Owner Surrenders. These cats are friendly, loving "house cats" that only know indoor living and being fed by humans. They are surrendered due to circumstances

1 such as: the owner is relocating and cannot take their animal, when a person dies
2 and there is no family available or willing to take the cat, or allergies develop, or
3 the cost is prohibitive due to loss of job or inflation, etc.

4 6. Cats in Need learns of cats that fall into one of the above categories by phone calls or emails
5 from members of the community seeking help.

6 7. Currently and for the past year, OC Animal Care refuses to accept any of the above types
7 of cats.

8 8. When the Covid pandemic struck, in or about March 2020, OC Animal Care eliminated
9 animal welfare services such as Trap, Neuter and Release, also known as "TNR". TNR is
10 a program that would provide spay and neuter services without charge for feral cats. TNR
11 is a humane, effective and proven program to control the population. Feral cats would be
12 captured in traps and released back into the neighborhood, by individuals, or rescue groups,
13 where it lived prior to capture. OCAC would spay/neuter the cats at no charge..

14 9. Despite repeated written and verbal requests by Cats in Need, and other animal welfare
15 advocates who have attended countless meetings and sent emails to OCAC, OC
16 Community Resources and the Orange County Board of Supervisors office, OCAC refuses
17 to re-instate TNR and owner relinquished cats.

18 10. As a result of OCAC's refusal to accept cats and reinstate animal welfare services and
19 programs such as TNR, the viability of Cats in Need is threatened in that our funds and
20 resources are being depleted at an alarming rate. We are not sure how much longer we can
21 sustain the volume of activity caused by OCAC's failure to provide animal services which
22 are paid for, but not provided to, the taxpayers. CIN has been a non-profit since 1990.
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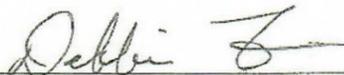
1 11. Cats in Need is fortunate to have caring and supportive individuals who have come forward
2 to foster kittens and cats until homes are found. However, since OCAC refuses to accept
3 cats, our fosters' capacity is literally bursting at the seams. And since Cats in Need
4 provides food and shelter until the animals are adopted, are resources are being depleted.

5 12. Without TNR at OCAC, Cats in Need has paid for the spay and neuter of animals at private
6 veterinary hospitals. Although we have been fortunate to partner with and obtain a
7 "discounted" rate at various veterinary hospitals, the volume of necessary spay and neuter
8 of animals has caused a significant depletion of funds; at a rate that cannot be sustained.

9 13. In summary, our rescue is rendering the services that OCAC should be providing. And I
10 am informed and believe and thereon allege that Cats in Need is not the only rescue that is
11 doing the heavy lifting to provide services to feral, neighborhood and owner surrendered
12 kittens and cats.

13 14. Based on the foregoing, I submit this Declaration to ask the Court to intervene and order
14 OCAC to a)accept adoptable cats and place them up for adoption to the public and
15 b)reinstate TNR. Without the Court's intervention, the future of Cats in Need is threatened.

16 I declare the foregoing to be true and correct under penalty of perjury. Executed at
17 Orange, California on October 31, 2022.

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23 DEBBIE ROBIN FRIEDMAN, Declarant