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DECLARATION OF GRETCHEN SCHULTZ

Gretchen Schultz declares:

1. In 1989, when Billy the elephant currently on exhibit at the Los Angeles Zoo was first acquired, I was employed there. I vividly recall his arrival.

2. Each fact set forth in this declaration is known to me of my own personal knowledge. If called as a witness I could and would competently testify to each facts set forth herein.

3. When Billy arrived at the Zoo, with three female Asian elephants, he was young, less than full grown and extremely cute. I recall spending considerable time watching him. I have reviewed the declaration of Jeff Briscoe, representing that Billy exhibited head bobbing and weaving, similar to his current behavior, when he arrived. I do not recall any of these four elephants, including Billy, head bobbing when he arrived.

4. It is my clear recollection that Billy exhibited none of the "stereotypic" behavior he now exhibits on a daily basis.

5. Further, it is my recollection that Mr. Briscoe was not working in the elephant barn at that time. He later returned to the elephants. However, at the time that

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1 Billy arrived, he was working in another part of the zoo.
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5 I declare under penalty of perjury pursuant to the laws of the State California that
6 the foregoing is true and correct.
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8 Dated: January 30, 2008
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10 GRETCHEN SCHULTZ
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