

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
MARGARET HEALY,

Index No.: 21646/11

plaintiff,

- against -

AFFIDAVIT OF JAMES
O'HANLON

SLANEY O'HANLON and SUSAN McCARTHY,

defendants,

-----X

STATE OF NEW YORK)

) ss.:

COUNTY OF NEW YORK)

JAMES O'HANLON, being duly sworn, deposes and says:

1. I am the husband of the defendant Susan McCarthy, and the father of defendant Slaney O'Hanlon. Emmett O'Hanlon is my son. I have personal firsthand knowledge of all matters herein stated.

2. On August 28, 2009, defendant Susan McCarthy abruptly left our marital home after she served me with divorce papers that very same day. At that time, she took our then minor daughter Slaney with her and since then, she has alienated Slaney against me.

3. On August 28, 2009, Ms. McCarthy and Slaney completely, willfully and deliberately abandoned the two (2) dogs, Lucy and Lady. They made absolutely no arrangements for the dogs and, for over two (2) years, never again concerned themselves with the dogs. In October 2009, Ms. McCarthy complained about the two (2) dogs causing damages, urine smell and feces to the marital home. She never, however, expressed any concern for their welfare, and did not do anything to take care of them.

4. Since I was working full-time working long hours to support my children, as I have always done, I could not properly care for the abandoned dogs. During the day Lucy was

kept in a cage too small for her and Lady was confined in a small passageway since Ms. McCarthy bitterly complained about the urine and feces. The dogs simply had no quality of life because they had been abandoned and, aside from complaining about them, Ms. McCarthy did absolutely nothing to help them. She never fed, cared for or walked the dogs she now claims to be so concerned about. Accordingly, I gave ownership of the dogs to my sister, Ms. Margaret Healy, who for over two (2) years has taken care of all their needs, including their veterinary care, feeding, grooming, bathing, walking, and attending to their social needs.

5. At absolutely no time did I ever abuse Ms. McCarthy and/or my children. All such allegations are false and malicious. I never told my son that Lucy would be returned because Lucy now belongs to Ms. Margaret Healy, who has had sole and exclusive ownership, custody and possession of Lucy, and has exclusively taken care of Lucy for over two (2) years.

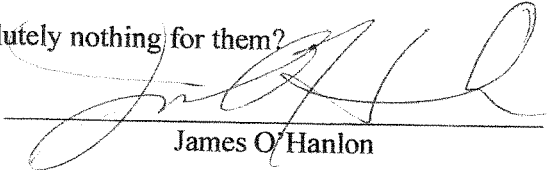
6. I have absolutely nothing to do with Ms. Margaret Healy's instant lawsuit. I in no way motivated or orchestrated this lawsuit. The Healys are not my puppets and any reasonable person would conclude that Lucy's best interests are served by her continuing as a member of the Healy family.

7. The Healys are devoted to Lucy and since both are retired, they focus their full attention on Lucy's care, health and well being.

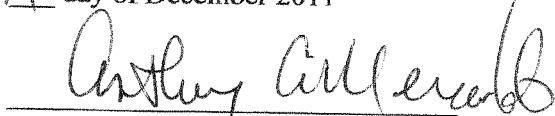
8. Despite her claims to the contrary, my daughter Slaney is a recent 18 year old high school graduate and not in a position to care for Lucy. She has never asked for the return of Lucy until now and has never notified me how she is going to be able to take care of Lucy.

9. In addition, the evidence demonstrates that Ms. McCarthy is obviously an angry person with an anger management problem. She also is not stable enough to properly care for

Lucy. If she was so concerned about Lucy, where was she the last two (2) years when she had no contact with either one of the dogs, and did absolutely nothing for them?


James O'Hanlon

Sworn to before me this
14 day of December 2011


Notary Public

ANTHONY A. MERCALOO
NOTARY PUBLIC, State of New York
No. 4945392
Qualified in Nassau County
Commission Exp. 12/19/2014