

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

MARGARET HEALY,

plaintiff,

INDEX NO.
21646/11

- against -

AFFIDAVIT
IN SUPPORT

SCANNY O'HANLON AND SUSAN MCCARTHY,
defendants.

MARGARET HEALY, of full age,
being duly sworn deposes and says:
I am the plaintiff in the
above matter. As such, I am fully
familiar with all matters stated
herein based on personal knowledge.

(2)

I submit this affidavit in support of the within order to show cause seeking emergent relief for a temporary restraining without notice to defendants.

2. Plaintiff could not give notice of this order to show cause seeking the temporary restraining order to both defendants because she does not know how to get in contact with them and in addition to contact them would put my safety in jeopardy.

3

3. The reason I am concerned for my physical safety is because defendants have acted unlawfully in stalking me and harassing me.

4. Specifically, on Friday September 16, 2011, both defendants came to my apartment building and told our doorman that they had an appointment with ^{me} I had not seen a text from either defendant in two years. Defendant Ms. McCarthy threatened the doorman

④

and he called the police, defendant
Ms. McCarthy lied to the police
and tried to get them to take my
dog Lucy.

5. That very same night of
September 16, 2011, Ms. McCarthy
followed me in her car to the
police department and she tried
to forcibly stop my car. I felt
very threatened and afraid.

6. On September 21, 2011, Ms. McCarthy
appeared again with two different
police officers and again tried

(3)

to get them to give her my dog
Lucy. I was afraid, threatened
and intimidated.

7. On September 16, 2011, defendant
Ms. McElroy left me a voice, pre-recorded
phone message in which she
cursed at me and notified me that
Lucy was not our dog. (The transcript
of the phone message is annexed
to the Verified Complaint as Exhibit

(4).

8. I fear for my safety and
unless defendant is restrained

(6)

from coming near me, I believe they will continue to stalk and harass me.

WHEREFORE, I respectfully request that your Honor grant this order to show cause seeking temporary restraint.

Margaret Healy
MARGARET HEALY

Sworn to Before
me this ^{23rd}
day of September 2011

~~Notary Public~~
Notary Public