

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
DISTRICT COURT DIVISION

NO. 07. WD 17739

2007 OCT 31 P 3:34

WAKE COUNTY, CSC

ANIMAL LEGAL DEFENSE FUND,
WAKE COUNTY, A North Carolina Body
Politic, and KELLI FERRIS, D.V.M.,

Plaintiffs,

v.

JANIE CONYERS,

Defendant.

**AFFIDAVIT OF MICHAEL WILLIAMS IN
SUPPORT OF PETITION FOR COSTS OF
CARE**

NOW COMES Michael Williams, being first duly sworn and says as follows:

1. I am Michael Williams and I am over the age of 18 years and competent to make this Affidavit and do so of my own personal knowledge.
2. I have personal knowledge of or am informed of and believe the facts set out in this declaration. If called upon, I could and would testify about the facts stated here.
3. I am the director of the Wake County Animal Care, Control, and Adoption Center ("the Shelter"). In this capacity, I am responsible for the day-to-day management of the Shelter, including executive decisions regarding the expenses undertaken by the Shelter.
4. The shelter charges eight dollars per day to board a dog. These charges include food, water, shelter, and basic maintenance.
5. The shelter does not generally board birds, but in my estimation the expenses for boarding a bird would be roughly equivalent to those for boarding a dog.
6. On October 19, 2007, 106 dogs and nine birds were brought to the Shelter.

7. In caring for the 106 dogs and nine birds seized from Janie Conyers, the Shelter incurred, received estimates for or was invoiced for the following expenses:
 - a. \$6536.00 based on 817 days of boarding care. This number is based on the number of total dog-days of care provided by the Shelter, prior to the transfer of multiple dogs to (1) veterinarians for necessary medical care and (2) foster homes;
 - b. 115 initial examinations at \$10 each, for a total of \$1150;
 - c. Eighty-three rabies vaccines at \$5 dollars, for a total of \$415;
 - d. Eighty-three distemper vaccines at \$2.50, for a total of \$207.50;
 - e. Eighty-five Capstar flea treatments at \$1, for a total of \$85;
 - f. Eighty-six topical heartworm preventative and flea, dandruff mite and ear mite treatment at \$3.50 each, for a total of \$301;
 - g. Ninety deworming treatment at \$1 each, for a total of \$90;
 - h. Necessary and ongoing medical care, including but not limited to dentistry, surgery for tumor removal, jaw repair, uterine infection, ear infection, and treatment of eye and skin diseases, for a total of \$45765.00;
 - i. Twenty microchips at \$5.95 each for a total of \$119; and
 - j. Overtime for shelter and animal control employees on 10/19/2007 and 10/20/2007 for a total of \$1619.89.
8. The total costs of “reasonable expenses” pursuant to N.C.G.S. § 19A-70, as summarized in Paragraph 7, is \$56288.39. This number is based on invoices received, the costs of medications and treatments, and estimates of the costs of

treatment received to date from veterinarians caring for the animals seized from Defendant's house.

9. Since costs are continuing to mount and the animals need additional treatment, I will provide a revised amount at the hearing on Wake County's petition.

I declare under penalty of perjury that the foregoing is true and correct. Signed this 30 day of October, 2007, in Raleigh, North Carolina.

FURTHER THE AFFIANT SAYETH NOT.



Michael Williams

Sworn to and subscribed before me this the 30 day of October, 2007.



CINDI ARNOLD
[Notary's Typed or Printed Name]

Notary Public

CINDI S. ARNOLD
NOTARY PUBLIC
WAKE COUNTY, N.C.
My Commission Expires 7-15-2009.

My Commission Expires: 7-15-2009

SF\ 9032029.1