

DECLARATION OF LAURA LEIGH

I, Laura Leigh, state under penalty of perjury under the laws of the United States, the following:

1. I incorporate all statements made in declarations made previously. This Declaration specifically responds to the factual matters stated in Melanie Mirati's declaration.
2. Statements about her experience fail to recognize that her behavior on the ground during the recent Calico roundup this winter demonstrated a disregard for the Intent document issued by state director Amy Lueders, previously presented to this Court. During Calico she hotshot a downed animal and allowed a run to continue after a distressed animal was observed and multiple attempts were made at the trap. Youtube: http://www.youtube.com/watch?v=l_JQZ6W4y-U vimeo video of drive: <https://vimeo.com/34984206>.
3. In paragraph 17 Mirati claims my assertion that body scores of animals is improving is false. BLM notes an improvement in condition on the gather update page on Thursday June 12 only to change back to the original claim after this suit was filed on Friday. I have included an attached photo log of horses from Jackson at the holding corral and the Henneke scale utilized to determine body condition.
4. Paragraph 18 actually established the minimal movement between the two populations that I assert.
5. Paragraph 19 that references distance demonstrates that there are no distance parameters as I assert. It also does not refute that they have no method of confirming any distance these animals travel. Foals do travel in their daily lives but the pursuit by a predator that is unnatural in nature(helicopter) is not part of the foals daily life and her failure to recognize that the anatomy of a wild foal is the same as a domestic foal is alarming.
6. Paragraph 20 confirms that the monitoring of pace and distance is not a known parameter by the COR but left up to the contractor with nothing in place to monitor accuracy.
7. In Paragraph 21 The assertion that animals are not entering the trap sweaty is blatantly false. (See attached photo log)
8. Paragraph 22 is misleading. The claim that care has been take to make sure mares and foals are not separated does not account for the continued breaking up of bands in runs that are done in a manner that require the need to constantly continue to chase animals by horseback and rope the. Two observed instances had foals run a considerable distance by wranglers on horseback and their captures took considerable

