IN THE UNITED STATES DISTRICT COURT 1 FOR THE WESTERN DISTRICT OF WASHINGTON 2 3 Jayakrishnan Nair, et al. 4 Plaintiffs, **DECLARATION OF** 5 RAJAKUMARI SUSHEELKUMAR v. 6

Channa Copeland, et al.,

Defendants.

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DECLARATION

- 1) I am Omana Thankamma's daughter whom she adopted when I was 3 months old. I am now 59 years of age, and living in Thiruvananthapuram, Kerala, India where I own a two-story home and have enough financial stability (I had worked for 35 years at the prestigious Mathrubhumi Printing and Publishing Company - one of India's oldest and largest circulating newspapers, and my husband Mr. Susheelkumar owns and runs a handicrafts exports business.) to take care of my mother at my home, and adequately provide for her medical expenses in India.
- 2) Contrary to what Commissioner Velategui has stated, India is the world's fifth largest economy, and has plenty of high quality hospitals and care facilities. As a matter of fact, many Americans come to India for treatment due to the high cost of medical care in the USA. His assertion that Omana cannot be moved to India because he "did not believe that poor country has any hospitals or nursing homes" can only be respectfully categorized as blatantly ignorant. 1.3 Billion people are not living without access to medical care, as he apparently wants to believe.
- 3) One such top-rated hospital (by international standards) near my home is Ananthapuri Hospital¹ where she can get care on par with any US hospital. We plan to admit her there upon her return to India, which she has stated to me as her "last, dying wish to see my homeland & family again".

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¹ https://www.ananthapurihospitals.com/

- 4) The only reason she has had anything to do with the United States is her incredibly profound love for her son, her only remaining child out of her three biological children. That is the reason she has been visiting the USA, but otherwise she is very close to her home and family in India.
- 5) On 6/13/2019, when I visited her at "Paramount Shelter Home", I was terrorized to see her covered in gruesome blisters, delirious & running a fever, and neglected to die in the filthiest conditions possible. Paramedics were called due to my intervention, and their statements and medical evidence corroborate that she was not receiving any nutrition or medicine for days. She had lost 20lbs of her weight, and her glucose was over 400, as was every other of her vitals.
- 6) Fearing that she would be returned to Paramount, I filed a complaint with Seattle Police on July 3rd 2019. The next day my brother and I spent several hours with her without any incident, but on the day after that, our visits were abruptly stopped with some ridiculous allegation of a floating substance found on her food- which was a pathetic attempt at inventing an excuse.
- 7) Since that day, for almost 5 months to date, neither I nor any of my family, or any of her local friends, have been allowed any visits or contact (even by phone) with our mother. I stayed in USA for several weeks hoping to see my mother, but has now had to return home to India to take care of my other commitments. I was never allowed to visit my mother after July 5th, and I had to leave in terrible pain and emotional agony not knowing if (or when) I could see her again.
- 8) There is absolutely no logical or legal reason to continue this torture for our poor mother or to our family, as she no longer has any reason to be in the United States if she is not permitted to live with her son, the only motivation for her to even be in the country in the first place.

 Therefore, I wish to bring her back to live the rest of her life in peace and happiness spending time with her most loving family in India under the best medical care possible, as she desires.

DATED this 19th day of November, 2019.

Rojaka

Rajakumari Susheelkumar

Mookambika, WSRA-189, West Fort, Thiruvananthapuram, Kerala, India