

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

Jayakrishnan Nair, et al.)	CASE # C19-1296-MJP
)	
Plaintiffs,)	
)	DECLARATION OF PEGGY CHONG
v.)	
)	
Channa Copeland, et al.,)	
)	
Defendants.)	

I being over the age of 18 and competent to testify herein,
make the following declaration based on my personal
knowledge:

SEE MY ATTACHED STATEMENT.

I certify that the above is true and correct under
penalty of the perjury laws of Washington State.

Dated Feb 13, 2020 at Summerville, South Carolina

Signature: /s/Peggy Chong



From: Peggy Chong hhponyfarm@gmail.com
Subject: Re: Medical Transportation of Omana Amma
Date: Feb 12, 2020 at 11:52:22 PM
To: Jayakrishnan Nair jknair@gmail.com

To whom it may concern:

I am a US citizen, formerly employed by Jay Nair to care for his mother, Omana Thankama at her home in Redmond, WA. I was a live-in caregiver, attending to her nutrition and physical care, as well as accompanying her with her son, Jay to doctors' appointments. He is a devoted son, who cares deeply about his mother. Being separated from her will cause both of them extreme emotional distress. She speaks limited English. As a teacher of English as a second language, I know how important it is to be able to communicate. Jay and Thanka are her favorite family members. Omana clearly needs their love and support at this time. If Omana is able to travel to India she will be overjoyed! Please do everything possible to allow this to take place. At the very least, do not continue to cruelly isolate her from her loving family.

Sincerely, Peggy Chong

Peggy Chong 2/13/2020
Sent from my iPhone

On Feb 12, 2020, at 11:28 PM, Jayakrishnan Nair <jknair@gmail.com> wrote:

FYI. Omana is still alert and conscious, she is in deep distress wanting to escape and be with family. Please see attached.

If either of you could help stating that Omana is close with her children and that we should be allowed to be with her at this time when she is in ICU (they are claiming she is too sick right now to be able to go back to India) that would help to let me spend as much as time with her. As you know they got a VAPO against me so I have been able to see her only once in the last 8 months that too when she has the tube on (see attached)