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4 ATTORNEYS FOR DEFENDANTS  
 5 MARC SAYER AND RENEE BRODEN

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 8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 9 COUNTY OF ORANGE

10 CASE NUMBER: 05 CC 09035

11 GENTLE GIANTS RESCUE AND  
 12 ADOPTIONS, INC. A California Non-Profit  
 Public Benefit Corporation, BURT WARD,  
 13 an individual, and TRACY WARD, an  
 Individual,

DECLARATION OF DEFENDANT RENEE  
 BRODEN IN SUPPORT OF DEFENDANT'S  
 MOTION TO STRIKE THE PLAINTIFFS  
 COMPLAINT AS A STRATEGIC  
 LITIGATION AGAINST PUBLIC  
 PARTICIPATION SUIT  
 {C.C.P. § 425.16 et.seq.}

14 Plaintiffs,

HON: DEREK G. JOHNSON  
 TIME: 1:30 P.M.  
 DEPT: C7  
 DATE:

15 v.

16  
 17 BARBARA LAID, an Individual, MARC  
 SAYER, an Individual, RENEE BRODEN,  
 18 an Individual, JAMIE GARCIA, an  
 Individual, and DOES 1 through 100  
 19 Inclusive,

20 Defendants,  
 21

22  
 23 I, RENEE BRODEN, declare under the penalty of perjury under the laws of the State of  
 24 California that the below is true and correct to the best of my knowledge. I am a resident of the  
 25 City of Granite Bay, in the State of California.

26 1. I am the operator of Great Dane Rescue of Northern California on-line message board  
 27 that permits interested parties to post their messages concerning their experiences and  
 28 opinions related to large breed dogs.

DECLARATION OF RENEE BRODEN IN SUPPORT OF SPECIAL MOTION TO STRIKE COMPLAINT  
 AS A SLAPP

- 1 2. I do not edit or otherwise involve myself with the content of messages.
- 2 3. There is a message board located at danesonline.com of which I am a contributor but  
3 not an owner. The Complaint allegation regarding this web-site is a republication of the  
4 comments of Michelle Giles, and I stated that it was only hearsay on this message board.
- 5 4. As of October 10, 2005, there were just under 2,000 messages on the board.
- 6 5. This web-site and message board is designed to meet the needs of the very large number  
7 of individuals who are concerned about the well-being of large breed dogs such as Great  
8 Danes.
- 9 6. The message board and the internet in general provide a convenient and fast method of  
10 communication which allows us to facilitate the rescue of a Great Dane when time can be  
11 a very important consideration.
- 12 7. The communication that Plaintiffs complain was not posted on the message board.
- 13 8. Ms. Giles raised the issue in an E-mail to me that she had adopted a dog she named  
14 "Amtrak." She claimed to have adopted this dog from Plaintiff Gentle Giant. She further  
15 claimed that the dog was microchipped, and that when she checked the microchip, she  
16 discovered the dog had been reported stolen.
- 17 9. Ms. Giles alleged that the dog she had adopted had been removed from the true owners  
18 yard by a volunteer of Gentle Giant.
- 19 10. I do not know if this is true or not.
- 20 11. Attached to the Notice of Lodgment as Exhibit "B" is a true and correct copy of the  
21 exchange of e-mails I had with Ms. Giles. I do not offer this as proof of what Ms. Giles  
22 says, only for evidence that I received this report from a third party.
- 23 12. The Plaintiffs allege that I libeled them by "publishing" accusations that they stolen and  
24 sold dogs and committed other improper acts.
- 25 13. I have never libeled the Plaintiffs. The publication that they refer to is a third party  
26 statement on the internet.
- 27 14. Ironically, as NOL Exhibit "8" shows, my response to Ms. Giles was that neither  
28 Northern California Great Danes Rescue, nor I wanted any involvement with a dispute

**DECLARATION OF RENEE BRODEN IN SUPPORT OF SPECIAL MOTION TO STRIKE COMPLAINT  
AS A SLAPP**

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between Ms. Giles and the Wards. I suggested she discuss any questions or concerns she had with them.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 11<sup>th</sup> day of October, 2005, in the State of California.

By:  RENE BRODEN

DECLARATION OF RENEE BRODEN IN SUPPORT OF SPECIAL MOTION TO STRIKE COMPLAINT AS A SLAPP