

STATE OF NEW YORK
SUPREME COURT COUNTY OF NEW YORK

-----x
In the Matter of a Proceeding under Article 70 of the
CPLR for a Writ of Habeas Corpus,

The Nonhuman Rights Project, Inc.,
on behalf of Tommy,

Petitioner,

-against-

PATRICK C. LAVERY, individually and as an officer of Circle L
Trailer Sales, Inc., DIANE LAVERY and CIRCLE L TRAILER
SALES INC.,

Respondents.

-----x
VERIFIED PETITION

Exhibits Annexed to the Verified Petition dated December 2, 2015

Exhibit 1

Order dated December 17, 2013 of Honorable Joseph M. Sise
Incorporating by Reference Transcript of Oral Argument
Attachment: Transcript of Oral Argument dated December 2, 2013

Exhibit 2

Letter dated May 1, 2014 from Arthur Carl Spring, Esq., Attorney for
Respondents, to Appellate Division, Third Department

Exhibit 3

Appellate Division, Third Department Order dated July 9, 2014
Granting Petitioner's Motion for Preliminary Injunction

Exhibit 4

Appellate Division, Third Department Order dated January 30, 2015
Denying Motion for Permission to Appeal to Court of Appeals

Exhibit 5

Court of Appeals Order dated September 1, 2015
Denying Motion for Leave to Appeal to the Court of Appeals

Exhibit 6

Letter Brief of Amicus Curiae Laurence H. Tribe dated May 8, 2015

In Support of Motion for Leave to Appeal to the Court of Appeals

Exhibit 7

Letter Brief of Amicus Curiae Justin Marceau dated April 14, 2015
In Support of Motion for Leave to Appeal to the Court of Appeals

Exhibit 8

Appellate Division, Second Department Order dated April 3, 2014
Dismissing Appeal

Exhibit 9

The Nonhuman Rights Project, Inc. Trust for Tommy, Kiko, Hercules,
and Leo dated November 15, 2013

Affidavits Annexed to the Verified Petition dated December 2, 2015

Affidavit of Molly Polidoroff sworn to December 5, 2014

- Exhibit: A. Photographs of "STC" Sanctuary
- B. Standards for Great Ape Sanctuaries

Affidavit of Steven M. Wise sworn to January 21, 2015 (*Stanley*)

- Exhibit: A. Printout of "Announcement of Agency Decision: Recommendations on the Use of Chimpanzees in NIH-Supports Research" dated June 26, 2013
- B. Brazilian Decision in Portuguese dated September 28, 2005 in *In favor of Suica, a Chimpanzee*
- C. English Translation of Brazilian Decision dated September 28, 2005 in *In favor of Suica, a Chimpanzee*
- D. Excerpts from Brief filed in Appellate Division, Fourth Department on behalf of Kiko
- E. Excerpts of Oral Argument of Steven M. Wise, Esq. in Appellate Division, Fourth Department
- F. Excerpts of Memorandum of Law filed in Supreme Court, Niagara County on behalf of Kiko dated December 2, 2013
- G. Verified Petition filed in Supreme Court, Niagara County on behalf of Kiko dated December 2, 2013

Affidavit of Steven M. Wise sworn to December 2, 2013 (Fulton)

- Exhibit: A. Disc of Video of Tommy
- B. Photographs of Tommy

Affidavit of James R. Anderson sworn to November 20, 2013

Affidavit of Christophe Boesch sworn to November 19, 2013

Affidavit of Jennifer Fugate sworn to November 22, 2013

Affidavit of Mary Lee Jensvold sworn to November 21, 2013

Affidavit of James King sworn to November 21, 2013

Affidavit of Tetsuro Matsuzawa sworn to November 23, 2013

Affidavit of William C. McGrew sworn to November 21, 2013

Affidavit of Mathias Osvath sworn to November 19, 2013

Affidavit of Emily Sue Savage-Rumbaugh sworn to November 22, 2013

Original Affidavits Annexed to the Verified Petition dated December 2, 2015

Supplement Affidavit of James R. Anderson sworn to November 18, 2015

Supplemental Affidavit of Christophe Boesch sworn to November 14, 2015

Affidavit of Jane Goodall sworn to September 21, 2015

Supplemental Affidavit of Mary Lee Jensvold sworn to September 29, 2015

Supplemental Affidavit of William C. McGrew sworn to October 9, 2015

Supplemental Affidavit of Emily Sue Savage-Rumbaugh sworn to
December 1, 2015