

This the 22<sup>nd</sup> day of July, 2008

  
Hannah Mathers Prichard (Seal)

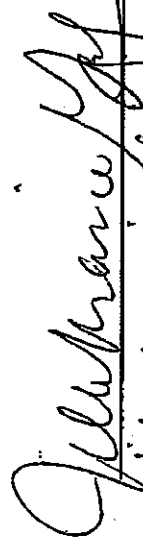
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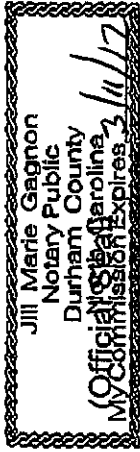
STATE OF NORTH CAROLINA

WAKE COUNTY

Sworn to and subscribed before me this day by Hannah Mathers Prichard. I have seen satisfactory evidence of the principal's identity, by a current state or federal identification with the principal's photograph in the form of a Pennsylvania Driver's License

Date: 8/22/08

  
Jill Marie Gagnon Notary Public  
(Printed Name)



My commission expires: 3/11/2012

NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE  
DISTRICT COURT DIVISION  
08 CVD 12310

WAKE COUNTY

GARRY D. RENTZ AND DONNA A. )  
RENTZ AND KRISTA C. LISTER, )  
Plaintiffs, )

v. )

AFFIDAVIT OF  
CLEA MORWICK

BRADLEY COOPER, )  
Defendant. )

Clea Morwick, being duly sworn, deposes and says:

1. I am over eighteen years of age and competent to testify to the matters set forth in this Affidavit.
2. Nancy Cooper was one of my best friends. I met her in March of 2005. We spoke daily, saw each other several times a week and vacationed together each summer. We (Nancy and the girls) had planned to be on vacation together during the first week of August this year.
3. Nancy was the primary care giver to Katie and Bella. She adored her girls and had an amazing capacity to make every day special for her daughters. She was the homemaker who did all the cleaning, laundry, cooking and shopping for the family. She got minimal help from Brad who was typically busy with work, his MBA program and training for Ironman events.
4. Over the years I have spent time with Brad Cooper as well. He has been very absent in the relationship with Nancy and the girls (Katie & Bella) until more recently (the last two months in particular). He is socially awkward and does not engage many people in conversation typically. He did not involve himself in many social and neighborhood events that Nancy and the girls went to. In the first couple years that I knew Nancy I saw her as a single mom because Brad was constantly unwilling or unavailable to help with the house or the children. Last year he was supposed to be at the beach with Nancy and the girls and our family and never made it to the beach all week.
5. Not long after Katie was born Brad had a business trip in Europe for two weeks and he did not call once to check on the family. Regardless of the fact that Nancy had been trying to contact him the whole time to discuss the children and other family matters. Despite the fact that he had a new born baby, nursing mother and toddler at home Brad was not concerned enough about the family to stay in contact.
6. Brad had an affair with \_\_\_\_\_, previously Nancy's best friend, and denied it for over a year despite the evidence against him. He was verbally abusive

and exhibited aggressive language and posture to Nancy during this time and continually turned the conversation back on her saying she was a terrible person for believing the stories of his infidelity. Nancy told me that he would yell at her in front of the children as well and that was very hurtful to them too. Even after it was confirmed by that she had an affair with him Brad still denied it. After a year of lies and aggressive heated arguments over the affair, Brad admitted it had occurred and that he had been in love with at the time. This was the final slap in the face for Nancy. She had been ridiculed, verbally badgered and humiliated again and again by Brad.

7. On another occasion Nancy had been contacted by a woman who said that she had had a sexual relationship with Brad as well. This indiscretion happened during a time when Brad was supposed to be working on a project for school where he was away for a weekend researching boat companies. Brad did not contact Nancy to let her know where he was or when he was coming home.

8. Nancy and Brad went on a trip with Brad's family this last year. While on this trip Brad's mother did everything possible to undermine Nancy's parenting. She told Nancy that she had very little to do with the upbringing of her grandchildren and the only reason that the kids were okay at all was because of Brad. Brad did nothing to defend Nancy in this case (and had not in the past when his mother had been verbally abusive to Nancy). Brad's mother did not want Nancy to go out with them for this "family" outing. Nancy had been sick at the time and she agreed to let Brad and his parents take the girls to the zoo that day, as long as they all got back in time to all have an early dinner together. She also asked Brad to call her during the day to check in and see how the girls were doing. Brad never called once, despite numerous calls and messages from Nancy. The group got back late in the evening after having eaten and never respected any of Nancy's requests. This was typical of Brad's behavior when his parents were around. His mother continually disrespected and belittled Nancy in front of the children and Brad stood by and did nothing.

9. Prior to the end of April, Brad and Nancy had decided to separate and that they would get the house ready to sell. Brad did very little to help in this process. Nancy and her sister Krista were repainting the kitchen/hallway area and Brad came in on multiple occasions after they were done to spackle areas that were already finished. Nancy felt that this was a way for Brad to keep in control and slow down the process of Nancy and the girls being able to get home to Canada.

10. In the last few months Brad had been more attentive to the family. Nancy said that she felt that this was in response to Brad not wanting to have to pay child support and alimony and now wanting to "play the good dad" in order to gain custody rights over the girls. Nancy was certain that Brad just didn't want to pay the money and that was the only reason he really wanted to pursue the child custody issue. Since prior to that he been fine with Nancy taking the children back to Canada (and this had been his suggestion earlier). When Nancy first told Brad that she wanted a divorce it was Brad who pushed for Nancy to move back to Canada with the children and move in with

Nancy's sister Krista and brother in law Jim. He was not concerned enough with what was best for the children to entertain any other options that Nancy suggested. He was so adamant about it that he was not willing to consider letting the Bella finish her school year out and pushed to have the three of them leave by April 26<sup>th</sup>.

11. Brad had made it very apparent to Nancy that he was the bread winner in the family and that was of utmost importance. Brad reminded her continually that she had a secondary role in the family at best. Nancy always referred to Brad as the "Budget Nazi" and he held the purse strings tight for as long as I can remember. Most recently Brad had cut Nancy off of all credit cards, bank accounts and common household utilities accounts. The water had gotten cut off at the house and Nancy tried to pay the over due balance with money from their shared bank account. She came to find that Brad had cut off all her access to money. Nancy could not pay the water bill, or access any money to buy food or necessities for her or the girls. Brad decided that he would give Nancy enough money to buy food, gas, necessities for the girls and no more. He said Nancy had no right to the family money and he would decide what amount of money needed per week. But at a moment's notice he would decide that he was holding back money for having a cell phone bill that he said was too high. Brad held Nancy hostage with his control over the family's money. He would randomly deny her this "allowance" on a whim, depending on his mood. Nancy would have to borrow money from friends and family to take care of some of the girl's basic needs.

12. When Nancy went to Hilton Head with her family recently she worked hard to get the house in order and cleaned before she left. She came home to a disgusting mess that Brad had created and had not found necessary to clean up. There was food left out and ants had started to accumulate in the kitchen area. There was filth in the bathroom that Nancy then had to clean up when she returned home. Brad had not replenished any food for the house so there was nothing for Nancy and the girls to eat when they returned home. Nancy was very angry over this situation and spoke of how disrespectful Brad had been and how unwilling he was to change this type of behavior.

13. In private conversations with Nancy she had shared with me that if anything ever happened to her that she wanted to be sure that her children would be raised by Krista and Jim Lister with the help of her parents. (I believe that they may have drawn up a will that speaks to this request) I believe that the girls would be best raised by Nancy's family which was her wish and intent. Brad has not chosen to be very involved in his children's lives for most of the time that I have know him and I do not believe that he is prepared or equipped to care for the girls on his own.

14. Further affiant saith not.

This the 23<sup>rd</sup> day of July, 2008

NORTH CAROLINA  
WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE  
DISTRICT COURT DIVISION  
08 CVD 12310

GARRY D. RENTZ AND DONNA A. )  
RENTZ AND KRISTA C. LISTER, )  
Plaintiffs, )

v. )  
MICHAEL MORWICK )

AFFIDAVIT OF  
MICHAEL MORWICK

BRADLEY COOPER, )  
Defendant. )

Michael Morwick, being duly sworn, deposes and says:

1. I am over eighteen years of age and competent to testify to the matters set forth in this Affidavit.
2. Nancy Cooper was one of my best friends. I met her in March of 2005.
3. We saw each other several times a week (our children were boyfriend/girlfriends) and vacationed together each summer. We (Nancy and the girls) had planned to be on vacation together during the first week of August this year.
4. Brad was very rarely part of the picture. He was usually absent during social events as he was busy with his Ironman training or completing his MBA program. Those outside activities consumed his time and left very little if any time for family. Because of my relationship with Nancy I have spent time getting to know Brad. He is socially awkward and typically does not engage many people in conversation. He did not involve himself in many social and neighborhood events that Nancy and the girls went to. In the first couple years that I knew Nancy I saw her as a single mom because Brad was constantly unwilling or unavailable to help with the house or the children. He has been very absent in the relationship with Nancy and the girls.
5. Over the years we have been very active with the Coopers. Together at neighborhood gatherings, dinners and vacations. If there at all, Brad usually left early to go home. He would occasionally take the children to put them to bed, but usually it would fall upon Nancy. Last year Brad was supposed to be at the beach with Nancy & the girls and our family for our yearly vacation. He had promised to make it down mid-week, and every day after but he never did find time to join us for the family vacation.
6. Brad is quiet, contemplative and socially awkward. He keeps to himself and has few friends.
7. Nancy was the primary care giver to Katie and Bella. She adored her daughters. She was the homemaker who did all the cleaning, laundry, cooking and

shopping for the family. She got minimal help from Brad who was typically busy with work or his MBA or training.

8. Brad had denied having an affair for over a year with Nancy's previous best friend despite the evidence against him. After a year of lies Brad admitted it had occurred (Nancy had told me of other affairs that have not been substantiated). A woman who said that she had had a sexual relationship with Brad as well had contacted Nancy. This indiscretion happened during a time when Brad was supposed to be working on a project for school where he was away for a weekend researching boat companies. Brad did not contact Nancy to let her know where he was or when he was coming home. Nancy had been humiliated again and again by Brad.

9. Nancy had started the divorce proceedings and prior to the end of April Brad and Nancy had decided that they would get the house ready to sell. Brad did very little to help in this process. Nancy packed their belongings and painted the entire house herself. Nancy told me Brad came in on multiple occasions after they were done to Spackle areas that were already finished.

10. Since March/April of 2008 Brad had been more attentive to the family. Nancy said that this was because Brad did not want to have to pay child support and alimony (as outlined in the proposed divorce papers) and now wanting to "play the good dad" in order to gain custody rights over the girls. Nancy was certain that Brad just didn't want to pay the money and that was the only reason he really wanted to pursue the child custody issue.

11. When Nancy first told Brad that she wanted a divorce it was Brad who pushed for Nancy to move back to Canada with the children and move in with Nancy's sister Krista and brother in law Jim. He wanted the three of them leave by April 26<sup>th</sup>. A few days before they were to leave, he changed his mind and made them stay.

12. Brad controlled the finances in the home. In the past year, he has denied money for basic necessities, removed her from joint bank accounts, canceled her credit cards and taken away cell phones. Nancy was given an allowance to buy food, gas, necessities for the girls and no more. He would randomly deny her this "allowance" on a whim depending on his mood. Nancy would have to borrow money from friends and family to take care of some of the girl's basic needs.

13. Brad was never a family man. His priorities were always first, be it training for an Ironman event, his higher education pursuits or unexplained absences. Brad took care of himself first. He has proven this time and time again.

14. Further affiant saith not.

This the 23<sup>RD</sup> day of July, 2008

  
Michael Morwick (Seal)

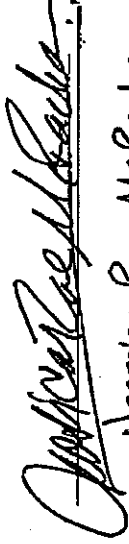
STATE OF NORTH CAROLINA

Wake COUNTY

Sworn to and subscribed before me this day by Michael Morwick. I have seen satisfactory evidence of the principal's identity, by a current state or federal identification with the principal's photograph in the form of a NC DL.

Date: 07-23-2008



  
Jessica Rae McRackan  
(Printed Name), Notary Public

My commission expires: My Commission Expires 4-20-2013.

Clea Morwick (Seal)  
Clea Morwick

STATE OF NORTH CAROLINA

Wake COUNTY

Sworn to and subscribed before me this day by Clea Morwick. I have seen satisfactory evidence of the principal's identity, by a current state or federal identification with the principal's photograph in the form of a NC DL.

Date: 07-23-2008



Jessica Rae McRackan, Notary Public

Jessica Rae McRackan  
(Printed Name)

My commission expires: My Commission Expires 4-20-2013.



NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE  
DISTRICT COURT DIVISION  
08 CVD 12310

WAKE COUNTY

GARRY D. RENTZ AND DONNA A. )  
RENTZ AND KRISTA C. LISTER, )  
Plaintiffs, )

v. )

BRADLEY COOPER, )  
Defendant. )

AFFIDAVIT OF  
TIMOTHY SIMMONS

Timothy Simmons, being duly sworn, deposes and says:

1. I am over eighteen years of age and competent to testify to the matters set forth in this Affidavit.
2. I met Nancy and Brad for the first time as dinner guests during December 2007. During this gathering of the families, I observed complete deferral of child-care responsibility to Nancy. In one instance, Bella and Katie were misbehaving and Brad slapped Nancy on the leg to indicate that she should resolve the situation rather than attend to it himself. At the end of the evening, I was left with the impression that Nancy performed most of the parental duties exclusively.
3. For a period of time, Brad was working full time, attending night school to complete the MBA program, and training for an Ironman Triathlon. He explained his schedule to me which consisted of a day that began at 5:00 a.m. and ended at 1:00 a.m. the next day. He would go to work, attend his MBA classes, and end his night with a two hour workout. During this time, he did not see his family. Also, on weekends he would train for twelve to thirteen hours per day.
4. Brad took away Nancy's mobile phone which endangered Nancy as well as the kids in the event of an emergency.
5. Brad withheld money from Nancy on several occasions which prevented her from buying food and supplied for their daughters.
6. Brad travelling to Ireland without his family for a week on business and he extended the trip over the weekend for pleasure. During this time, he left insufficient funds for Nancy to care for their daughters. Nancy had to sell personal items in a garage sale at our home to ensure she had money.
7. Further affiant saith not.

This the 23<sup>rd</sup> day of July, 2008

[Signature] (Seal)  
Timothy Simmons

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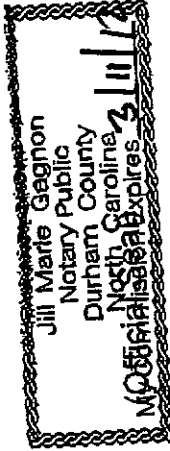
STATE OF NORTH CAROLINA  
WAKE COUNTY

Sworn to and subscribed before me this day by Timothy Simmons. I have seen satisfactory evidence of the principal's identity, by a current state or federal identification with the principal's photograph in the form of a WAL.

Date: 7/23/08

Jill Marie Gagnon Notary Public  
Jill Marie Gagnon  
(Printed Name)

My commission expires: 3/11/12



NORTH CAROLINA

WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE  
DISTRICT COURT DIVISION  
08 CVD 12310

GARRY D. RENTZ AND DONNA A. )  
RENTZ AND KRISTA C. LISTER, )  
Plaintiffs, )

v. )

BRADLEY COOPER, )  
Defendant. )

AFFIDAVIT OF  
MICHELLE SIMMONS

Michelle Simmons, being duly sworn, deposes and says:

1. I am over eighteen years of age and competent to testify to the matters set forth in this Affidavit.
2. I was a close friend of Nancy Cooper. I have personal knowledge regarding the circumstances surrounding Nancy Cooper and Brad Cooper's marital situation.
3. At the end of December 2007, I recall Brad yelling at Nancy. He told her that he hated her in front of their children. Bella began to cry and said "why does Daddy hate you?"
4. A few months ago Nancy was supposed to come by my house with the girls. Nancy was at a play-date and was planning to come to my house after the play-date. She called me after her play-date and said Brad was angry and yelling at her to come home. I was still on the phone with her as she pulled into her driveway. Nancy told me Brad was waiting outside for her. When she got out of the car he took her cell phone away from her. That was done in front of Bella and Katie. He hid her phone for several days until Nancy found it and took it back. Nancy and I talked about the fact that he was wrong not letting her have a phone in the event she ran into car trouble or something and had the girls with her. This was the first time I told Nancy how afraid I was for her. My husband and I begged her and the girls to move into our home.
5. Several months ago, Bella's nose was broken. Nancy took her to the doctor and the doctor wanted to do the procedure to correct her nose the very next day. The doctor said he did not know if Bella would be awake or asleep for the procedure. Brad did not take off work to attend the procedure. Nancy had to hold Bella while it was being done. At the same time Katie was with her at the doctors' office. Nancy said it was very upsetting for her to watch Bella during the procedure. I had offered to watch Katie for her and she had declined because she thought Katie would be napping in her stroller at that time. Nancy and I talked about how unbelievable it was that Brad never offered to be there for his child.

6. Nancy was always on the go with her girls. She would take them everywhere with her. I would ask her how she did it and she said she had no choice and knew no other way.
7. Until a few months ago, Brad had never met Bella's preschool teachers. After he retained his divorce attorney, he decided to be more hands on with the girls. Nancy called me one morning and said that Brad would not let her take Bella to school. She was upset and said Brad had told her she was not going anywhere with Bella. Nancy said Bella was upset and confused by that whole situation.
8. Until this year Nancy told me Brad never attended Bella's birthday parties.
9. I saw pictures from the Cooper's family beach trip last year. I asked Nancy why Brad was not at the beach with her and the girls and she said he was supposed to join them, but then decided not to. She did not have a reason why he did not come out for the weekend portion.
10. Nancy told me Brad had sexual relations with \_\_\_\_\_ as Bella slept in the room.
11. Brad travelled to Ireland in June. Nancy told me his work there would only take a day or so. Brad told her it was his company that wanted him to stay for a week since they had spent a lot of money on the plane ticket. That never made sense to us and we talked about how we could not understand why he would not want to get back to the kids as soon as possible.
12. When Nancy told Brad the marriage was over, he told her he wanted to spend the summer with the girls and then for her to take them and for him to never see them again. At a later date he told Nancy they could go their separate ways and each take one child.
13. Nancy sat down with Brad to discuss the custody and arrangements. She said they decided on June so that Bella could finish school. He was fighting with Nancy a lot and being pretty awful to her, while the girls were at home. He then told her one day he wanted her and the girls out as soon as possible. He said he wanted to put the house on the market and wanted them moved out by the time it was listed. The date was changed to the end of April. He would fight with her on a regular basis about when she was leaving and around 3 weeks before she was scheduled to go in April he tried telling her to be out with the girls in a few days. I would talk to her about how unbelievable it was that he was so eager to get her and the girls out.
14. Diana Duncan and I offered to make the drive to Canada with her so that she would have help with the girls on the drive. We did not want Nancy to have to drive alone. She always did everything alone.

15. He refused to allow her to leave for Canada and we couldn't believe it since this was a man who kept trying to kick them out sooner and moving up the dates. It was also a surprise because Brad had never been very involved as a father before.

16. He took her off the bank account and took away her credit cards. Nancy and I would talk about how awful it was that she had to go inside the gas station to pay in cash because she had no bank/credit cards to use at the pump. She almost always had the girls with her when she would get gas, so it was an extra hassle for her and them. She would ask Brad to set up an account that gave her a debit card for those types of situations, but that was never done.

17. She was home with the girls and had the water turned off. He was in total control of the funds and Nancy, Bella, and Katie were at home with no water waiting for Brad to pay and have it turned back on.

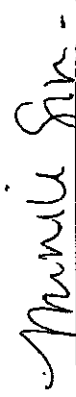
18. I had a garage sale while Brad was in Ireland and Nancy asked to join me. Nancy was alone with the girls for the week and had to do all the work associated with a garage sale. She needed the garage sale money to pay for gas, etc. while Brad was away. When he got back she was out of all money. She kept asking him for some. We wanted to take the kids to a movie. He kept saying he forgot to stop at an ATM. He finally told her to take the foreign money he brought back from Ireland and cash it in for American money. Rather than stop at an ATM for her, Nancy had to take Katie with her down to the airport and exchange the money. She and I talked about how difficult he made everything for her and we could not believe he was not more accommodating for his children to see a movie.

19. Brad controlled all money. Nancy had to buy food and gas with the money he gave her. She spent many, many nights at our home for dinner because she was always running out of money. He gave her such little money that it was hard for Nancy to buy food, items for the girls or even birthday presents for the girls to bring to parties they were invited to.

20. Nancy told me that she did not have a good relationship with Brad's family. She said that his parents were no longer welcome in their house and that it was Brad who told them so. Nancy told me that Brad was not close with his family and never told them of the divorce. She also told me that Brad's parents were harsh with Bella and Katie and that the girls did not like them. From what Nancy told me, it was a very cold relationship between Nancy, Brad, the children and Brad's parents.

21. Further affiant saith not.

This the 23 day of July, 2008

  
Michelle Simmons (Seal)

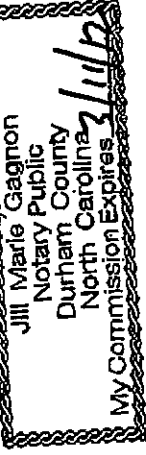
STATE OF NORTH CAROLINA

WAKE COUNTY

Sworn to and subscribed before me this day by Michelle Simmons. I have seen satisfactory evidence of the principal's identity, by a current state or federal identification with the principal's photograph in the form of a WAL.

Date: 7/23/07

Jill Marie Gagnon Notary Public  
Jill Marie Gagnon  
(Printed Name)



My commission expires: 3/11/2012

NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE  
DISTRICT COURT DIVISION

WAKE COUNTY

08 CVD 12310

GARRY D. RENTZ AND DONNA A. )  
RENTZ AND KRISTA C. LISTER, )  
Plaintiffs, )

v. )

BRADLEY COOPER, )  
Defendant. )

AFFIDAVIT OF  
DAMIA MICHELLE TABACHOW

Damia Michelle Tabachow, being duly sworn, deposes and says:

1. I am over eighteen years of age and competent to testify to the matters set forth in this Affidavit.
2. I knew Nancy Cooper for five years prior to her death. I met Nancy when she was pregnant with Bella. For the first two years, we were friendly neighbors and after attending dinner parties with Craig and Diana Duncan (and my son and Bella being in the same preschool class), we grew closer over the past three years.
3. Nancy shared a number of stories with me about her marriage and pending separation. I am sharing the stories below in hopes that it will bring awareness to the type of person Brad Cooper is and that Bella and Katie should remain in custody of Nancy's family (Sister/Parents) permanently.
4. I was with Nancy at a party at The Duncan's on Friday, July 11, 2008. I spent the last hour and a half of the party talking to Nancy. During that time she told me that she and Brad were "back in hate mode." That "playing nice" as advised by his attorney was over. She told me that she had been painting at Jessica Adam's house that week to make a little extra money because her current allowance from Brad was not enough for the basics for her and the girls. Once Brad found out that Jessica was paying her for this work, he stopped her allowance.
5. I do not know Brad very well. In the five years of knowing Nancy, I had maybe seen Brad fifteen times and he never seemed to recognize who I was each time I saw him. He did come with Nancy and the kids to a cook out at my home on Memorial Day 2008. At this time, he was "playing nice" and was actually friendly to me. However, also at this party, Nancy explained to me that she had recently found out that Brad had had multiple affairs. It had recently come out in their discussions about their separation and Nancy was very sad about this. She said she could not believe that this was the man she had married; she could not believe it could get to such a sad and disturbing point.

6. I knew of the affair with \_\_\_\_\_ as \_\_\_\_\_ told me all about it and that opened the conversation between me and Nancy. Nancy explained that she had found out about \_\_\_\_\_ and that she and Brad were in counseling and trying to work on their marriage. However earlier in 2008, Nancy told me that she simply could not forgive him. It took him months in counseling to even admit that he had an affair with \_\_\_\_\_ even though Nancy knew all of the details. He continued to lie throughout the entire process.

7. In the time that Nancy decided to begin the separation process and was planning to move back to Canada, she shared more stories of Brad's lack of respect for her, lack of care for the well-being of the girls and his controlling nature. When she first decided to move to Canada, he helped her pack and called the moving van and could not seem to be rid of her and the girls quickly enough. She was basically going to be gone within 2 weeks. I had planned to attend her going away party but was unable to as I was out of town but I received a call that it was no longer a going away party as Brad would not let her leave once he found out that he would have to pay her money for supporting the girls.

8. At this point, things really seemed to be rough. He cut Nancy off financially and would do things like follow her to the gas station to fill her car with gas so she was unable to get cash back as he did not want her to have any money. Nancy also mentioned that he was not careful when arguing in front of the girls. I got the impression that he often put Nancy down in front of the girls and used inappropriate language in their arguments with no regard for the girls being present.

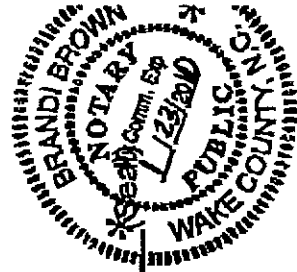
9. As for the affair I know about, Nancy told me that \_\_\_\_\_ and Brad had sex while Bella was asleep in the bed in the same bedroom. This total lack of care that Bella could wake up and see them is so upsetting.

10. I feel very strongly it is in the best interest of Bella and Katie to remain with Nancy's family.

11. Further affiant saith not.

This the 23<sup>rd</sup> day of July, 2008

  
Damia Michelle Tabachow



STATE OF NORTH CAROLINA

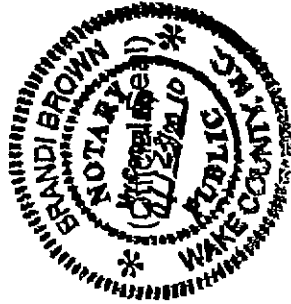


Wake COUNTY

Sworn to and subscribed before me this day by Damia Michelle Tabachow. I have seen satisfactory evidence of the principal's identity, by a current state or federal identification with the principal's photograph in the form of a NC DRIVER'S LICENSE.

Date: 07/23/2008

Brandi Brown, Notary Public



Brandi Brown  
(Printed Name)

My commission expires: 01/23/2010

NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE

WAKE COUNTY

DISTRICT COURT DIVISION

08 CVD 12310

GARRY D. RENTZ AND DONNA A. )  
RENTZ AND KRISTA C. LISTER, )  
Plaintiffs, )

v. )

BRADLEY COOPER, )  
Defendant. )

**AFFIDAVIT OF  
GINGER C. CALLOWAY, PHD**

Dr. Ginger C. Calloway, being duly sworn, deposes and says:

1. I am over eighteen years of age and competent to testify to the matters set forth in this Affidavit.
2. I am a licensed psychologist, licensed to practice psychology in the State of North Carolina, and I have been licensed continuously since 1972 at the masters' level and since 1981 at the Ph.D. level. My license number is 935.
3. I have been in an independent private practice for 25 years in Raleigh, N.C., as a clinical and forensic psychologist. At the present time, my practice is primarily forensic in nature. Plaintiff's counsel in this case approached me about service as an expert witness.
4. In my capacity as forensic psychologist, I have performed hundreds of evaluations for the Court, have been qualified as an expert witness over a hundred times in multiple District, Superior, and Federal Courts, and have served as consultant to numerous attorneys as an expert.
5. The evaluations I have conducted for the Court include but are not limited to comprehensive child custody evaluations. I have conducted hundreds of comprehensive child custody evaluations to the Court for roughly 22 years. Many of these evaluations include allegations of domestic violence and child abuse, about which I am required as the Court's expert to fully investigate and to reach conclusions.
6. A review of my Curriculum Vitae is attached and provides documentation of continuing education I have received in this area of family relations.
7. In my practice, I have evaluated and treated victims of trauma of varying types, including children of divorce, battered women, emotionally and psychologically abused adults and children, victims of sexual abuse, and victims of attempted homicide.
8. The facts as I know them in the current case include that there are two female children, ages 2 and 4, who are the subject of the current custody action.

Custody action was begun in the spring of this year with ongoing negotiations between the biological mother and biological father of these children regarding their custody. A determination of custody was not arrived at as a result of these negotiations. The mother of the children is recently deceased, her death has been classified as a homicide, and there have been no charges filed against any suspect(s). The maternal grandparents and maternal aunt have filed an emergency action for custody and were awarded emergency, temporary custody. I understand that these third parties would like to have temporary custody of the two children. I understand that there will be a hearing for temporary custody on Friday, July 25, 2008. At this time, the Court will decide what custodial arrangement is appropriate under the circumstances. I have met none of the parties in this action.

9. In the Findings of Fact issued by the Court in its Ex Parte Emergency Custody Order, the order notes that a neighbor and not the biological father of the children reported his wife missing. The father also did not contact his wife's family regarding her disappearance. The order states the father attempted suicide as a teenager and threatened to commit suicide in the winter of 2008. The order notes that the father has a history of emotional instability and faces intense scrutiny as a result of the ongoing criminal investigation of his wife's death. In the Order, the court notes that the father of the children has acted inconsistently with his constitutionally protected status as a parent to the minor children.

10. I was asked my opinion about an appropriate custodial environment for children who have experienced similar traumas to these children.

11. I have reviewed the following documents in preparation of this Affidavit:  
Complaint and Motion for Emergency Custody Order  
Ex Parte Emergency Custody Order

12. For children who have suffered the kind of loss these children have suffered, a major consideration is their safety. This kind of loss is traumatic to children and confusing to children of the age of these children. They simply must be in a custodial environment where they are safe. This includes their physical safety where they will not suffer harm or threat of harm of any type. They also need a safe, trusting emotional environment where they are safe to disclose their fears and knowledge about the death of their mother. Without further investigation and evaluation, it is not known at the present time what the children may have witnessed or heard regarding the death of their mother. This is important to know for the long term adjustment of the children to this obviously significant loss and trauma. It is also important that the court provide the children with a physically and emotionally safe environment in the meantime such that the children can feel safe to disclose what they know.

13. In a general way, children suffering from traumatic events require stable, nurturing and supportive custodial environments where caregivers are open to trauma specific interventions. Such interventions require that caregivers also understand their own feelings and behaviors that are a result of the trauma and how these affect or may

affect the children. Trauma specific interventions are provided by experts in trauma and will, in most if not all cases, involve active participation by caregivers.

14. In addition, children suffering from traumatic events require caregivers who can give them complete and undivided attention to their needs, fears and other behaviors that result from the trauma. This means that caregivers must be willing to educate themselves about trauma related behaviors through immersion in trauma specific interventions. They must also have the time to devote to children such that they are not distracted by their own life circumstances and/or emotional states. They must not be distracted by circumstances and from a personality perspective, they should be sensitive to children's needs and feelings.

15. If the facts are as I know them to be from my review of records, I have concerns for the safety, well being and welfare of these young children that include the following.

16. It is not known what if anything the children may have witnessed about their mother's murder. An emotionally safe, supportive environment is essential for potential disclosures. In addition, a carefully planned, professional forensic evaluation of the children is in order.

17. If the father of the children is under intense scrutiny because of the criminal investigation and attendant media scrutiny, I am concerned that he will of necessity be overly attentive to his own defense and not able to adequately attend to his children's needs and feelings as they require. Especially as these are young children, their behaviors indicating effects of trauma may not be obvious or make sense. Because they are young children, their demands and needs require immediate attention. Appointments with a trauma expert or trauma specific team of professionals may of necessity not be a priority or even possible for this father. Further, absent his involvement in her death, the death of his wife may be sufficiently distressing to him to make him emotionally unavailable to his children.

18. If relatives of the father are also intensely concerned with the scrutiny of him regarding the criminal investigation, I am concerned that the children will not receive complete attention to their needs. If the children have witnessed or remember any details just prior to their mother's death that would be useful in their treatment by a trauma specialist, this same information could be damaging or incriminating to their father, even if he is not found guilty of his wife's murder. The children's memories could be confusing for family members and upsetting, without a complete understanding of the mechanisms of children's memory and trauma. Therefore, for them to be in the custody of their paternal grandparents places them at potential risk for not fully disclosing memories if the children perceive these could harm their father or if family members perceive these could harm the children's father.

19. The court has found that the father of these children has a prior history of suicide attempts. If this is true, I am concerned with the emotional well being of the

father to which he would of necessity need to attend. This would make his complete emotional availability to his children very unlikely. I am also concerned that the criminal investigation, media scrutiny and murder of his wife may make him generally less emotionally robust than usual. If that were the case, his stability for the children would be at risk. From what I have read and reviewed, a forensic evaluation of the father with comprehensive, psychological testing would assist the court in determination of permanent custody.

20. In my opinion and if the facts are as I believe them to be, a mental health evaluation of the father should precede contact with the children. This is a conclusion I draw because of risk to the children in the ways I have previously outlined, particularly as regards memories the children may have that would be helpful for their recovery from trauma.

21. From what I have read and reviewed and given the recent murder of their mother, more information about the children and any caregivers are needed prior to determination of permanent custody.

22. It is my understanding from the Complaint and Motion for Emergency Order that Plaintiff Garry Rentz previously served as the executive director for Alberta Social Services for five years in Alberta, Canada. If this is factual information, then he is most likely in a position to obtain services necessary for a trauma specific intervention for these children.

23. In my professional opinion, for the children's welfare, safety and well-being, their caregivers need to be emotionally accessible to them, sensitive to their needs, and willing to engage in a trauma focused intervention, especially when this requires their active participation. They should have the time to devote to the children with minimal distractions and should be emotionally stable, physically and emotionally supportive and highly nurturing.

24. Further affiant saith not.

This the 23 day of July, 2008

23

  
Ginger C. Calloway, PhD  
(Seal)

STATE OF NORTH CAROLINA

WAKE COUNTY

Sworn to and subscribed before me this day by Ginger C. Calloway, PhD. I have seen satisfactory evidence of the principal's identity, by a current state or federal identification with the principal's photograph in the form of a NCSL.

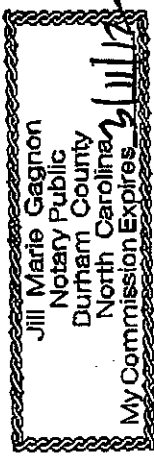
Date: 7/23/08

Jill Marie Gagnon Notary Public

Jill Marie Gagnon  
(Printed Name)

My commission expires: 3/11/2012

(Official Seal)



NORTH CAROLINA

FILED

IN THE GENERAL COURT OF JUSTICE  
DISTRICT COURT DIVISION

2008 JUL 23 PM 3:46

WAKE COUNTY

08 CVD 12310

WAKE COUNTY, C.S.C.

GARRY D. RENTZ AND DONNA A. RENTZ AND KRISTA LISTER,

Plaintiffs,

v.

BRADLEY COOPER,

Defendant.

AFFIDAVIT OF  
DESIREE JACKSON

Desiree Jackson, being duly sworn, deposes and says:

1. I am over eighteen years of age and competent to testify to the matters set forth in this Affidavit.
2. I was a close friend of Nancy Cooper. I have personal knowledge regarding the circumstances surrounding Nancy Cooper and Brad Cooper's marital separation.
3. While married with 2 daughters, Brad maintained an ongoing affair with Nancy's best friend,
4. While married to Nancy, Brad engaged in sexual intercourse with in the children's home with his daughter Bella present in the same room.
5. Brad told Nancy he hated her at Christmas time (2007) in the presence of Bella. Not surprisingly Bella was very upset and cried uncontrollably.
6. Brad did not buy Nancy a Christmas present (2007). This led Bella to ask why Santa didn't bring anything for Mommy.
7. Brad unreasonably restricted his wife and daughters financially:
  - (i) Brad did not provide Nancy with a car for the first year they were in North Carolina.

(ii) Approximately January or February of 2008, Brad began to restrict Nancy's access to money. Nancy said he gave her \$50 and said "make it work."

(iii) Brad did not pay the water bill on time, causing the water to the house to be turned off. Nancy had no access to money, and was unable to pay the bill to restart running water.

- (iv) Brad took Nancy's cell phone away from her, even though Nancy provided the majority of the transportation for his daughters. This could have been significant had there been an emergency while Nancy was driving the girls around.
- (v) Nancy suffered from Crohn's disease, which required her to follow a special diet. When Brad cut off her access to money, she was unable to purchase these specific items. In fact, she and the children often ate dinner at friends' houses as a result.
- (vi) Forced to earn extra money to supplement Brad's minimal allowance, Nancy began painting friends houses so she could make some extra cash. When Brad found out, he refused to give her an allowance. She also began selling some of her personal clothing in order to meet living expenses.
8. On three different occasions, Brad and Nancy had appointments to get the children's passports issued. Brad repeatedly did not show up for these appointments. When they did finally obtain the children's passports, Brad stole them out of her car.
9. Brad rarely, if ever, bathed his children or put them to bed.
10. Brad rarely attended Bella's school or dance functions.
11. Brad rarely, if ever, cared for his daughters when they were sick, even when he was home from work.
12. Brad maintains a website [www.adventuresofbrad.com](http://www.adventuresofbrad.com) that describes the important events of his life but does not ever mention his children or wife, nor are there any photos of his children.
13. Very recently, July 2008, Nancy, Bella and Katie went to Hilton Head to visit family while Brad stayed back at home. During the entire week, Brad never called to speak to his daughters. When Nancy and her daughters returned from Hilton Head, they came back to a filthy home. There were ants all over the kitchen because Brad had left food out and never cleaned up after himself.
14. Brad has not attended many events to support his daughters and deceased wife. This demonstrates that Brad lacks the emotional strength and stability that Bella and Katie so desperately need as they move forward in life without their loving mother Nancy.
14. Brad did not attend numerous press conferences about his missing/murdered wife.



15. Brad did not attend the candlelight vigil to honor Nancy. While countless friends and family members shared memories, grieved, and celebrated her life, Brad could not summon the strength to even attend and honor his own wife.
16. Brad did not attend his own wife's Memorial Service. He was literally "not there for his daughters" during their mother's memorial service.
17. Brad did not attend the reception at the Umstead hotel for family and close friends, although both of his daughters were there.
18. I would fear for the girls' safety if they were left with Brad unsupervised.
19. Further affiant saith not.

This the 23 day of July, 2008

*Desiree Jackson* (Seal)  
Desiree Jackson

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STATE OF NORTH CAROLINA

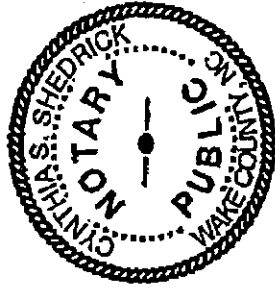
Wake COUNTY

Sworn to and subscribed before me this day by Desiree Jackson. I have seen satisfactory evidence of the principal's identity, by a current state or federal identification with the principal's photograph in the form of a NC Drivers License

Date: July 23, 2008

*Cynthia S Shedrick*, Notary Public  
(Printed Name)

(Official Seal)



My commission expires: July 24, 2010