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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON FOR KING COUNTY

In re the Marriage of:

SOLOMON METALWALA,

Petitioner,

and

JULIA BIRYUKOVA,

Respondent.

No. 10-3-04039-4 SEA

DECLARATION OF JULIA BIRYUKOVA  
IN STRICT REPLY

My name is Julia Biryukova. I am over 18 years old and am competent to testify as a witness in this matter. I am writing this declaration in strict reply to Solomon Metalwala's response to my cross motion for temporary orders.

Mental Health Allegations

I do not suffer from severe OCD and I never have. Dr. Sholl is a Founding Fellow of the Academy of Cognitive Therapy, the only certifying organization for cognitive therapists. Cognitive therapy is an evidence-based method of treating anxiety, obsessive-compulsive disorder, depression, and other conditions. He is trained specialist in all these areas. His letter of declaration states " Ms. Biryukova's obsessive-like-behavior was, I believe, a response to the severe stress she was placed under by trying to cope with marital and financial difficulties which she couldn't understand and which made no sense to her." Solomon does not know what OCD is and the behaviours he claims are OCD are not due to that condition. I am a clean and organized person and always have been. When I am stressed, I am more controlled about my environment, not as a product of OCD, but in an effort to feel in control of my life and to please people. Solomon forced me to go to psychiatrist and was present at all of my psychiatric appointments. He became my spokesperson. I began to

DECLARATION

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Seattle, Washington 98102  
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1 believe what Solomon was saying. I believed that Solomon knew me better than I knew myself.  
2 Solomon has used me since the day he met me when I was 15 years old and he was 21. I believe  
3 that Solomon was planning this for a long time. He wanted to leave me and get the children and I  
4 never saw it coming.

5 I never engaged in the behaviours that Solomon alleges that I did. I am attaching a  
6 photograph of my kitchen, in our small condominium that clearly shows food in the house and dirty  
7 dishes in the sink. I am attaching another photo of the children taken in my home that clearly  
8 demonstrates that the children are in no way malnourished. Finally, I am attaching a letter from  
9 CPS where they do not find that I subjected the children to any abuse or neglect. According to my  
10 psychological evaluator, Dr. Stephen J. Cummings I never should have been committed in any  
11 hospital, he states "Frankly, it is remarkable to this evaluator that this woman was initially  
12 committed to a hospital and finally voluntarily admitted under spousal duress to UW Hospital's  
13 psychiatric ward." I never should have been placed on the types of medication that Dr. Riabova had  
14 prescribed for me. Dr. Cummings continues by saying "I am extremely familiar with the use and  
15 abuse of psychiatric power in this country to exaggerate an individual's life difficulties into major  
16 mental illnesses, which require inpatient hospitalization and powerful psychotropic medication.  
17 Unfortunately, Julia had seen a particularly authoritarian Russian psychiatrist who gave her a host of  
18 diagnoses that coincided with Solomon's claims of mental instability".

19 My mother is submitting a declaration explaining why she sent me the email that Solomon  
20 attached to his responsive declaration.

#### 21 Dr. Waling's Declaration

22 Last I know, Dr. Waling was dating a friend of Solomon's. He is a naturopath whom I saw  
23 in 2006 when I was pregnant with Maile. I had severe complications. I had been to the Overlake  
24 emergency room several times. I was bleeding heavily and there was a concern that I might  
25 miscarry. I saw Dr. Waling during that time for IV treatments. I do not doubt that Solomon was  
26 doting during that time as I was pregnant with our first child. Otherwise everything Dr. Waling has  
27 to say is hearsay based upon what Solomon told him. Things between me and Solomon changed a  
28 lot since I last saw Dr. Waling.

DECLARATION

1 Visitations with Maile

2 I have visited Maile much more often than is reflected in the sign in sheets. I did not sign in  
3 every time that I visited Maile at her preschool. I was never told that I had to sign in, nor did I  
4 realize that the sign in logs would be used for court. If I had been aware of that, then I would have  
5 been careful to be very accurate in my writings and recordings. There are two separate entrances to  
6 the day care. I would sometimes sign in when I went through the main entrance. I sometimes  
7 entered through the other entrance and went directly into Maile's class. Other times I would find  
8 Maile outside and I would go directly to her. The daycare did not want me to visit until after the  
9 afternoon nap and snack due to their schedule. I would have been there every day but sometimes I  
10 had to attend necessary doctor visits, DSHS and other professional appointments. I also relied on  
11 the kindness and availabilities of my mother and my friend Sue Jewett for transportation. I live on  
12 the Talus Mountain in Issaquah where there is no bus service. I desperately miss Maile and this  
separation has been almost unbearable for me.

13 Dr. Cummings Bill

14 My mother paid for Dr. Cummings evaluation of me. The bill he sent to Solomon's attorney  
15 that I attached to my motion was for counselling sessions that I had with him while Dr. Sholl was  
16 away on vacation. This court ordered Solomon to pay for my uninsured counselling expenses.  
17 Solomon can likely be reimbursed from the insurance company after he pays the bill. Dr.  
18 Cummings just does not bill the insurance company directly.

19 Rental Car

20 My mother rented a car for me for a short time. I am including my brother's declaration  
21 regarding the accident and the condition of the vehicle. He explains it better than I can. I do not  
22 have a vehicle.

23 Domestic Violence

24 I am including a declaration from my friend Shelbi Owen that describes how Solomon  
25 treated me when I was in the hospital and after I left the hospital. It also describes how Solomon  
26 treated her and her family. I am also including a Police report from the Renton Police Department  
27 Case Number: 2010-00005604, where Solomon's brother has threatened to shoot me. This is the  
28 same brother Solomon and my children are living with.

1 Financial Issues

2 Solomon has given me \$200 that was ordered by the court since the last time we were in  
3 court. He has never paid me \$400 per month.

4 I declare under penalty of perjury pursuant to the laws of the State of Washington that the  
5 foregoing is true and correct to the best of my knowledge

6 DATED this 23 Day of September, 2010

7  
8   
9 Julia Biryukova



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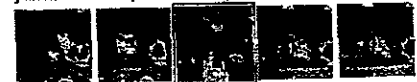
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Julia Metalwala

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