



**Affidavit #2
of Donna Palamarek
Sworn October 15, 2010**

**Action No. 08-0327
Action No. 07-3415
Victoria Registry**

IN THE SUPREME COURT OF BRITISH COLUMBIA

**IN THE MATTER OF THE *PATIENTS PROPERTY ACT*
R.S.B.C. 1996, c. 3249 AND AMENDMENTS THERTO**

- AND -

IN THE MATTER OF KATHLEEN PALAMAREK, PATIENT

AFFIDAVIT

I, DONNA LEE PALAMAREK, retired Insurance Corporation of British Columbia employee, of 10324 Bowerbank Road, Sidney, British Columbia, MAKE OATH AND SAY THAT:

1. I am the wife of Ralph James Palamarek (“Ralph”), and daughter-in-law of Kathleen Palamarek (“Mom”) and as such have personal knowledge of the matters hereinafter deposed to except where the same are said to be on information and belief, in which case I verily believe the same to be true.
2. I make this affidavit in response to portions of Affidavit #8 of Lois Sampson (“Lois’ Affidavit #8”) and Affidavit # 1 of Gil Sampson.
3. In response to paragraph 7 of Lois’ Affidavit #8, Lois statement is inaccurate. My father was my mother’s primary care giver during the time she was ill. Ralph and I visited my parents frequently during the last few years of my mother’s life and at one point my parents’ stayed for 6 months with Ralph and me in our home where I helped dad cope with my mother’s condition. I say this not to diminish my sister’s contribution as she also participated in assisting dad to cope with my mother’s condition.
4. In response to paragraph 8 of Lois’ Affidavit #8, I refer to the statement made in paragraph 14 of my Affidavit #1. While I have tried to be a positive factor in the family and have tried to keep on good terms with Lois, it is necessary to be careful around Lois as she often exhibits sudden bursts of anger and rage.

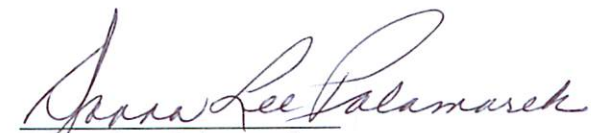
5. In addition in response to a portion of paragraph 8 of Lois' affidavit #8, Lois' statement that she stayed at our home and assisted me for about 10 days after I was released from hospital after surgery to remove my appendix is not accurate. Lois did stay at our home but only after Ralph bargained and pleaded with her to do so, and she did not remain for 10 days as she left to tend to her cat. Ralph arranged for a friend to come look in on me for the remainder of the time Lois was supposed to be there along with the nurse through VIHA who came to change my bandages.

6. In response to paragraph 9 of Lois' Affidavit #8, I refer to the statement made in paragraph 21 of my Affidavit #1. My statement is accurate and Lois' statement of the event is not.

7. In response to the statements in paragraphs 17 – 21 of Lois' Affidavit #8, and paragraph 6 of Affidavit #1 of Gil Sampson, I have reviewed emails which are representative of communications between Ralph and me and Lois and Gil prior to Mom taking up residence in Broadmead Lodge. Lois statement of events is inconsistent with those emails and to the best of my recollection with remarks and statements made by her in many phone calls about that time. Gil's statement that we did not consult and that we acted in a covert manner are not accurate. We genuinely tried to keep Lois and Gil and indeed the rest of the family informed about what was going on with Mom and believed that Lois and Gil were supportive of the decision (as noted in their e-mails to us) to have Mom move into Broadmead Lodge. These emails are referred to as Exhibits "B" of Ralph's Affidavit #8 sworn on today's date.

8. Lois' and Gil's statements in paragraph 63 of Lois' Affidavit #8 and paragraphs 8 and 9 of Gil's Affidavit #1, even if they accurately reflect Gil's and Lois' intentions are not realistic. The conduct of this matter has fractured the family relationships. Gil and Lois are pursuing control over Mom and will not accommodate the concerns of the family. If Lois is appointed Committee, she and Gil will carry out their plan to remove Mom from Broadmead Lodge and will then control all access to Mom with the result that the loving and caring relationship she has with her sons will be ended.

Sworn before me at the City of)
 Victoria, in the Province of)
 British Columbia this 15th day of)
 October, 2010)
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 Donna Lee Palamarek

A commissioner for taking affidavits
 within British Columbia

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