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13 **IN THE UNITED STATES DISTRICT COURT**
14 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

15 Jonee Fonseca, an individual parent and) Case No.: 2:16-cv-00889 – KJM-EFB
16 guardian of Israel Stinson, a minor,)
17 Plaintiff,)
18 Plaintiffs,) **DECLARATION OF DR. ALAN**
19) **SHEWMON**
20 v.)
21 Kaiser Permanente Medical Center)
22 Roseville, Dr. Michael Myette M.D., Karen)
23 Smith, M.D. in her official capacity as)
24 Director of the California Department of)
Public Health and Does 2 through 10,)
inclusive,)
25 Defendants.)

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DECLARATION OF ALAN SHEWMON, MD

I, Alan Shewmon, MD, am not a party to the above-encaptioned case and if called upon, I could and would testify truthfully, as to my own person knowledge, as follows:

1. I am a pediatric neurologist with triple board certification: in Pediatrics, Neurology (with special competence in child neurology), and Electroencephalography. I have had a particular interest in brain death and have published and lectured extensively on the topic, nationally and internationally. I recently retired as Professor of Neurology and Pediatrics at the David Geffen School of Medicine at UCLA and Chief of the Neurology Department of Olive-UCLA Medical Center (a county hospital affiliated with UCLA), while remaining clinically active.
2. I am willing to testify as to my expertise in brain death in this case.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 6th Day of May, 2016.

S/ Alan Shewmon, MD
Dr. Alan Shewmon, Plaintiff