

DECLARATION OF CAROLYN HERON, M.D.

1
2 I, Carolyn Heron, have personal knowledge of the facts stated in this declaration and,
3 if called as a witness, I could and would testify competently thereto under oath. I declare as
4 follows:

5 1. I am a medical doctor, and I am currently teaching physical diagnosis and treatment to
6 students at Pilsen Family Medicine in Chicago. I have done extensive work with brain injured
7 patients.

8 2. I am completely licensed as a Physical, Medical and Rehabilitation (PMR) doctor, by the
9 American Board of PMR. I have been practicing medicine since 1978, and I did my
10 rehabilitation residency at Schwab Rehabilitation Center in Chicago. I have done extensive
11 teaching and lecturing, and I have written several articles.

12 3. I have not physically examined Terri Schiavo, however I base my opinions on my
13 extensive knowledge and experience working with patients in a similar condition, as well as my
14 limited knowledge regarding Ms. Schiavo's actual condition. I have seen videotapes of Ms.
15 Schiavo on the news and judged her behaviors and facial expressions. I have also read a number
16 or articles regarding her situation.

17 4. Based on my opinion, Ms. Schiavo is not in a persistent vegetative state (PVS). Someone
18 in a vegetative state does not respond to stimuli around her, and does not move voluntarily. A ^{appropriately} CH,
19 PVS patient may have a following with the eyes, but it does not translate into a facial response.
20 There is no processing of the information. Ms. Schiavo does show appropriate facial response to
21 stimuli. She also sits up independently. These behaviors are not consistent with someone in a
22 vegetative state. Therefore, she is at least in a minimally conscious state (MCS). I believe she is
23 better than minimally conscious.

24 5. Ms. Schiavo does not choke on her saliva, therefore she has some swallowing function.
25 This is also inconsistent with PVS. It cannot be assumed that Ms. Schiavo will not be able to

Declarant initials: CH.

1 live without the feeding tube. There are techniques for learning how to swallow. Furthermore
2 she may have some ability now. There is also a method to swallowing without aspirating. If the
3 patient sits up straight and swallows using a thick substance she may be able to learn to swallow.
4 Thickening substances can be given to Ms. Schiavo to create a milkshake consistency, for easier
5 swallowing. It is possible that with certain substances Ms. Schiavo can learn how to swallow.

6 6. I believe that Ms. Schiavo needs to be evaluated and examined. There are therapies
7 available to treat her. She needs aggressive rehabilitation.

8 7. A specialist in physical medicine and rehabilitation, extensively trained in brain trauma,
9 should do an exam on Ms. Schiavo that will be able to determine her ability to respond to
10 stimulation and show cerebral awakensness. An MRI is not sufficient. If Ms. Schiavo has appropriate
11 neurological response to exams administered by a ^{physiatric team.} neurologist, that would prove that she is not a ^{et.}
12 vegetable. ^{CH}

13 8. I would not use the term "vegetative" in describing Ms. Schiavo. She is at least stage
14 two, possible three, on the Rancho Los Amigos Scale.

15 9. I would be able and willing to evaluate and examine Ms. Schiavo if possible.

16 I declare under the penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct.

18 Executed this 3rd day of March, 2005, in Chicago, Illinois.

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20
21 Carolyn Heron M.D., PH.D.
22 Carolyn Heron, M.D., Declarant
23
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Declarant initials: CH

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CURRICULUM VITAE

CAROLYN R. HERON, M.D., PM&R

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Chicago, IL 60607
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EDUCATION

RESIDENCIES:

Schwab Mount Sinai Hospital
Chicago, Illinois
Program in Physical Medicine and
Rehabilitation, completed in 1986.

1980-1986

Mount Sinai Hospital
Chicago, Illinois PEDIATRICS

St. Josephs Hospital
Chicago, Illinois PEDIATRICS

1978-1981

University of Pisa, Italy
Pediatric Residency completed

MEDICAL SCHOOL:

University of Pisa, Italy
M.D. degree, 1978

EXTERNAL CLERKSHIP:

Kohnhospital
Zurich, Switzerland

Virginia Mason Clinic
Seattle, Washington

GRADUATE:

University of Illinois
Chicago, Illinois

UNDERGRADUATE:

Roosevelt University
Chicago, Illinois
Bachelor of Sciences, 1969

LICENSES

-LICENSE to Practice Medicine and Surgery
States of Illinois and Minnesota (IL #036065728-1)

-LICENSE to Practice Medicine and Surgery
EUROPEAN UNION

-CERTIFICATIONS:

FLEX
ECFMG
AMERICAN BOARD OF PM&R PART 1 & PART 2
EU Board of Pediatrics

PROFESSIONAL STAFF HISTORY

2003-2005	Clinical Diagnosis/Treatment Instructor Rush Medical Students Pilsen Family Center
2004	Supervising Attending/Instructor PADS Program Loyola University Residents Oak Park, Illinois
2000-2002	Clinic, Dr. Mario Cornali Massa, Italy Attending Staff
1986-2000	Ravenswood Hospital Chicago, Illinois Attending Staff
1986-1998	Schwab Hospital Chicago, Illinois Attending Staff
1986-1998	Mount Sinai Hospital Chicago, Illinois Attending Staff
1986-1998	Edgewater Hospital Chicago, Illinois Attending Staff
1986-1996	Resurrection Hospital Our Lady of Resurrection Hospital Alexian Brothers Hospital Chicago, Illinois Attending Staff
1986-1999	Norwegian American Hospital Sacred Heart Hospital Chicago, Illinois Consulting Staff

LECTURES AND PRESENTATIONS

- Association of Foramen Secundum with Mitral Prolapse in Pediatric Population
- Muscular Dystrophy
- Bladder Management in SCI
- AK Amputee
- Anatomy and kinesiology of the hand

- Common Ventricle
- Acute Rehabilitation Management
(Teaching Video for R.N.'s)
- Concept of Rehabilitation
- Bladder Rehabilitation
- Sexual Dysfunction and Disability
- Treatment of Decubitus Ulcers
- Lower Extremities Orthotics
- Positioning of the Disabled Patient
- Bed Rest
- Beginning a New Practice as a Physiatrist
- Exercise Program for The Cardiac Patient
- Stay Healthy as You Age
- Dysphagia
- Head Trauma: Options after Phase II
- The Day Hospital
- Reflex Sympathetic Dystrophy
- Prognosticators for Return of Function on Physical Examination
- The Decision for Rehabilitation
- Concept of Rehabilitation
- Pain Management
- Cardiac Rehab
- Multiple Sclerosis
- Guillan-Barre'
- Locomotion Mechanics
- Scoliosis
- Cancer Rehab
- Stroke
- Cerebral Palsy
- Burn Rehab
- Some Basic Principles of Lower Extremity Orthotics
- Osteoporosis
- Arthritis
- Spinal Cord Rehab
- Energy Cost in Ambulation
- Joint Replacement and Rehab
- Rehab of Head Trauma
- Muscular Dystrophy
- Sexual Function
- Parkinson's Disease Rehab
- Neurogenic Bladder
- Systemic Lupus
- Scleroderma
- Polymyositis
- Pulmonary Rehab
- Common Problems in Sports Medicine

COURSES ATTENDED

- TRACHEAL PHARYNGEAL INTUBATION
Children's Memorial Hospital; Chicago, Illinois
- INFANT INTENSIVE CARE
Woodstock, Illinois
- LOWER AND UPPER PROSTHETICS AND ORTHOTICS COURSES
Northwestern University Medical School; Chicago, Illinois
- SEXUALITY AND DISABILTY COURSE
Schwab Mount Sinai Hospital; Chicago, Illinois
- ADVANCED CARDIAC LIFE SUPPORT PROVIDER COURSE

St. Lukes Hospital; Chicago, Illinois
-EMG DR. ERNIE JOHNSON
Baylor University; Houston, Texas

RECENT COURSES ATTENDED (2000-2005)

- Psychical Medicine and Rehabilitation Review
- Failure To Thrive
- Neuralgic Exam
- Geriatric Rehabilitation
- The Living Brain
- Diagnosis and Management of Seizure Disorders
- Adult and Pediatric Infectious Disease
- Metabolic Syndrome
- Thyroid Disease Management
- Osteoporosis-Osteoporotic fractures
- Cognitive Depression
- The challenges of managing COPD
- Improving quality of life: Managing Migraine and Herpes
- Effectively Timing the Treatment of Hypertension
- Diabetes Update
- NEW FRONTIERS IN ANXIETY AND BIPOLAR DISORDERS
- SPINAL CORD INJURY
- VICTORY WITH VACCINES
- FAMILY PRACTICE BOARD REVIEW
- LIFE CYCLE OF ALZHEIMER'S DISEASE
- PRACTICAL APPROACH TO TREATMENT OF PARKINSON'S DISEASE
- LONGTERM MOOD STABILIZATION IN THE BIPOLAR PATIENT
- BETTER MANAGEMENT OF PSYCHOSIS IN THE ELDERLY
- STROKE AND REHABILITATION: UNDERSTANDING SPASTICITY
- MANAGING MIGRAINE
- MANAGING HERPES
- IMPROVING THE QUALITY OF LIFE IN COPD
- ADHD - ADVANCES IN MANAGEMENT
- TODAY'S WOMAN DURING THE REPRODUCTIVE YEARS
- MANAGING EPILEPSY
- LONGTERM MANAGEMENT OF SCHIZOPHRENIA
- EXCELLENCE IN JOINT REPLACEMENT
- MEDICAL MANAGEMENT OF OSTEOARTHRITIS
- CURRENT CLINICAL ISSUES IN PRIMARY CARE
- MAXIMIZING ONCOLOGIC THERAPY
- SOLUTIONS IN COMPLEX DEMENTIA
- VALUE OF MANAGING ASTHMA
- PATHOGENESIS OF POST-OPERATIVE ADHESIONS
- TO BREATHE FREELY - NEW CONCEPTS IN ASTHMA AND COPD
- TAKING CONTROL OVER STRESS - URINARY INCONTINENCE
- MANAGING GENITAL HERPES
- EMERGING ANTIBIOTIC RESISTANCE
- YEARLY PRI-MED CONFERENCES
- MANAGING MIGRAINE
- BREAK-THROUGHS IN MANAGING STRESS INCONTINENCE

- B-TYPE NATRIURETIC PEPTIDE: CLINICAL UTILITY IN THE EMERGENCY DEPARTMENT AND IN-HOSPITAL SETTING
- INSULIN RESISTANCE AND TYPE II DIABETES
- AEDS AND WOMEN
- NEW CONCEPTS IN CARDIOVASCULAR MANAGEMENT
- THYROID DYSFUNCTION AND ITS TREATMENT

-COMMITTEES:

ADVANCED LIFE SUPPORT
CONTINUING MEDICAL EDUCATION
PM&R REVIEW; University of Washington
Seattle, Washington

ARTICLES

"REHAB OFFERS HOPE TO THE STROKE PATIENT", Lerner Newspapers, 1989.

PRIMARY CAREER ACCOMPLISHMENTS

- ESTABLISHMENT OF REPUTATION "Doctor of Last Resort"-20 YEARS PRACTICE DEVOTED TO PATIENTS WITH SEVERE CEREBAL TRAUMA
- ESTABLISHMENT OF PHYSICAL REHABILITATION UNIT AT RESURRECTION HOSPITAL
- ESTABLISHMENT OF SUB-ACUTE REHABILITATION UNIT AT RAVENSWOOD HOSPITAL
- INSTRUMENTAL IN ESTABLISHING SCHWAB PEDIATRIC REHABILITATION UNIT and PRESENCE AT LARABIDA HOSPITAL