DECLARATION OF RALPH ANKENMAN, M.D.

1. Ralph Ankenman, M.D., have personal knowledge of the facts stated in this declaration and, if called as a witness, I could and would testify competently thereto under oath. I declare as follows:

2. I am a psychiatrist. My practice involves the evaluation and treatment of the brain injured and mentally retarded at Madison County Hospital in London, Ohio.

3. I have been successfully using a new and experimental treatment with my patients, which I believe should be considered for the treatment of Terri Schiavo. We have anecdotal evidence that patients who are in a catatonic state become more functional on this treatment using the medicine, Namenda (memantine). Such patients who were once catatonic and did not move when another person raised their hand became normal in movement, and patients who could not talk well are now able to talk easily.

4. Namenda is a medicine that slightly modifies NMDA (a type of glutamate receptor), which is an amino acid receptor of the brain and, therefore, may cure dissociation in the brain.

5. The treatment is to administer doses of Namenda on an accelerated schedule of increasing the dose from 5 mg every 2 to 4 days up to at least 20 mg a day to see if Ms. Schiavo will be able to make new attempts to communicate with others.

6. Such a treatment is based on the properties of this newly available (only since 2004) medication and is built on several assumptions, which are plausible, but not standard concepts.

7. The long duration lack of speech seen after injury trauma is not always due to destruction of brain structure. Sometimes it is due to a state of brain dysfunction that is reversible. The condition of dysfunction can be considered a state of dissociation, wherein the brain is blocked from certain patterns of organization and thus unable to perform certain routine activities. It is reasonable to consider it a dissociative state since dissociation is one psychological phenomenon which can last years then cease to exist instantaneously. There was a recent case involving Sarah.
Scanlin in Kansas, who started communicating after 20 years. It is easier to consider that she was blocked from speaking by a dissociative process which suddenly resolved than it is to believe that she had an area of neurological injury which somehow rejuvenated after 20 years.

7. Namenda has demonstrated the ability to help recover blocked speech in a variety of situations which might represent dissociation. This is seen in Alzheimer's patient's increasing ability to communicate. It is also seen in the improvement of clarity and clarity of speech of the brain-injured, the increased socialization and attempt to communicate of autistic individuals, and in the rapid improvement in function and verbal communication of patients who have been in catatonia. Namenda also helps individuals with standard dissociative conditions – specifically it can diminish the amount of time that individuals "lose" in conditions such as Post Traumatic Stress Disorders. (Namenda acts on a glutamate receptor mechanism as a partial blocker. It has long been believed that glutamate is related to dissociation since the two powerful medicines which cause dissociation are strong complete glutamate blockers – PCP and ketamine.)

Namenda is quite free of major side effects.

8. Unfortunately, there is as of yet no published literature validating these assertions. The American Journal of Psychiatry and the publication Current Psychiatry have accepted articles about the use of Namenda in Catatonia for future publication.

9. I understand that this is a presumptive treatment; it has not been proven to work in any case of post-injury mutism. If it were to work, it would demonstrate that Ms. Schiavo has intact facilities. However, failure to obtain a response does not indicate that she is incapable of functional thinking.

10. The idea of using a medicine to spark brain function in a brain is not a standard concept – however, its proven rapid benefit in several patients with catatonia provides a reason to believe it is worthwhile trying it for Ms. Schiavo.

11. I would be pleased to make myself available to assist in the evaluation and treatment of
Terri Schiavo. I strongly believe that she deserves the chance to benefit from all new treatments, programs, including the possible use of Namenda.

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

Executed this ___ day of March 2005, in ______, Ohio.

Ralph Ankenman, M.D.
Ralph Ankenman, M.D., Declaring