

DECLARATION OF DAVID L. COULTER, M.D.

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2 I, David L. Coulter, M.D., have personal knowledge of the facts stated in this declaration
3 and, 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 currently work at Children's Hospital in Boston. I am an
6 Associate Professor of Neurology at Harvard Medical School.

7 2. Whether or not Terri Schiavo is in a persistent vegetative state at this time is not clear
8 from the facts that are available to me at this time. I have reviewed many of the documents and
9 videos and am unable to reach a conclusion from them.

10 3. As a member of the Multi-Society Task Force on Medical Aspects of PVS, which
11 reported our findings in the New England Journal of Medicine in 1995, I am knowledgeable
12 about this question, and if called, I would be able to conduct an examination for this purpose.

13 4. New technology has made it possible to discover more clearly and with more certainty
14 what brain functions are preserved in patients like Terri Schiavo, and thus to learn what her
15 current condition is.

16 5. Therefore I call for more diagnostic tests and examinations utilizing the best available
17 knowledge and technology to discover Terri Schiavo's current neurological status.

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

20 Executed this eight day of March, 2005, in Boston, Massachusetts.

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24 David L. Coulter, M.D., Declarant

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Declarant initials: _____