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DECLARATION OF LAURIE BARCLAY, M.D.

I, Laurie Barclay, 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:

1. I am a neurologist in private practice in Tampa, Florida. I am also a medical writer and neurological consultant. I was trained as a medical student, intern, and neurology resident and chief resident at New York Hospital-Cornell by Doctors Fred Plum and Jerome Posner, authors of the classic "Diagnosis of Stupor and Coma" and coiners of the term "persistent vegetative state."

2. A copy of my curriculum vitae is attached.

3. Based on my training, experience and expertise as a neurologist, as well as on review of video clips, articles, and other publicly available materials concerning Terri Schiavo, I am of the following opinions:

4. Terri Schiavo reacts with emotionally appropriate facial expressions, behavior, and attempted vocalizations to her relatives, and she discriminates in these responses in that they are different toward beloved relatives than they are to strangers. These responses are not consistent with someone in a persistent vegetative state, and suggest a level of consciousness of at least "minimally conscious state" as recently defined by the American Academy of Neurology, if not even a higher level of consciousness.

5. Terri Schiavo deserves a complete, multidisciplinary evaluation by a team of specialists to define and quantitate as accurately as possible her level of brain function and conscious state. At minimum, this should include thorough record review, physical examination, neurological examination, neuropsychological testing using specialized tests geared to patients with communication impairments, speech therapy evaluation, swallowing evaluation, physical therapy evaluation, functional MRI, and SPECT scanning.

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1       6. Based on this multidisciplinary evaluation, this team of specialists should collaborate to  
 2 devise a therapeutic plan designed to rehabilitate Terri Schiavo and improve her level of function  
 3 to the extent possible. In my opinion, a plan based on a thorough evaluation as indicated above  
 4 has an excellent chance of at least limited success. Her ability to engage in meaningful, albeit  
 5 largely nonverbal, interaction with her family and her environment despite only very limited, if  
 6 any therapy, is a testament to her strong will to live and her potential to improve further.

7       7. A thorough evaluation and treatment plan of this type would improve Terri Schiavo's  
 8 ability to swallow and perhaps even to eat without the aid of a feeding tube. To withhold feeding  
 9 without such an evaluation, and to allow this woman to dehydrate and starve, would inflict  
 10 suffering and death by cruel means, and would, in my opinion, amount to murder.

11       8. I am also of the opinion that tube feeding is merely a way to provide nourishment to  
 12 someone with a swallowing impairment, not an extraordinary measure.

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

15 Executed this 22 day of March 2005, in Tampa, Florida.

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 18 Laurie Barclay MD  
 19 Laurie Barclay, M.D., Declarant

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