

1 **DECLARATION OF DR. JILL JOYCE, Ph.D., LMFT, SLP-CCC**

2 I, Jill Joyce, Ph.D., 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 dually licensed as both a psychotherapist and a speech/language pathologist. I have
6 worked with severely brain-damaged people for over twenty years, did research, wrote a book,
7 about memory loss and taught university classes over the last ten years.

8 2. I have not physically examined Terri Schiavo, however I base my opinions on my
9 extensive knowledge and experience working with patients in a similar condition. I have also
10 read articles and seen videotapes of Ms. Schiavo on the internet, from which I am able to render
11 an educated opinion.

12 3. Based on my observations and experience, it is my opinion that Ms. Schiavo would be
13 able to learn how to swallow if given the proper therapy. I have personally treated stroke
14 patients, and other patients with severe brain damage similar to Ms. Schiavo's, that have
15 regained their ability to swallow after being given the proper therapy.

16 4. I have seen several patients that are in a persistent vegetative state. I have also seen other
17 patients that were diagnosed as being in a persistent vegetative state, and I saw several of those
18 patients come back to a cognitive state when given proper therapy. Based on my experience, I
19 know the difference between someone in a persistent vegetative state and someone who is not in
20 this state. It is my opinion that Ms. Schiavo is not in a persistent vegetative state.

21 5. Based on my own professional experience, along with the video of Ms. Schiavo, it is my
22 opinion that she is already swallowing her own saliva.

23 6. I believe that Ms. Schiavo would improve with aggressive swallowing therapy. There are
24 many new therapies available that would help Ms. Schiavo dramatically over time.

25 7. In my professional opinion, Ms. Schiavo has not been given the proper therapy. I am

Declarant initials: JJ

1 willing to personally evaluate and administer therapy to Ms. Schiavo because I believe she can
2 learn to swallow if given the proper stimulation.

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

5 Executed this 31st day of March 2005, in Margate, Florida.

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Dr. Jill Joyce
Dr. Jill Joyce, Ph.D., LMFT, SLP-CCC, Declarant

Declarant initials: JJ