

1                                    **DECLARATION OF KYLE LAKAS, M.S., C.C.C., S.L.P.**

2            I, Kyle Lakas, 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 Speech Language Pathologist (S.L.P), and I currently work in hospitals and  
6 nursing homes in Abilene, Texas, assisting adults; mainly stroke victims. I spend a large amount  
7 of time providing swallowing therapy and treatment.


8            2. I have a Masters in Science (M.S.), and I also have a Certificate of Clinical Competence  
9 (CCC).

10           3. I have not physically examined Terri Schiavo, however I base my opinions on my unique  
11 knowledge and experience working with patients in a similar condition, as well as my limited  
12 knowledge regarding Ms. Schiavo's actual condition. I have experience working with another  
13 patient in the same condition as Ms. Schiavo, however her therapy began immediately.

14           4. It is my opinion that a patient can never have too much therapy, at any stage. Without  
15 giving Ms. Schiavo therapy, she does not have a chance to improve. She deserves at least six  
16 months of five day a week therapy to see if she can progress at all. The changes in a patient  
17 during this time period may be slight, and therefore extensive documentation is required.  
18 However, even a slight change in condition is a great improvement. After aggressive therapy a  
19 decision can be made regarding the appropriate treatment for Ms. Schiavo.

20           5. I believe Ms. Schiavo needs both a speech assessment and a swallowing assessment.

21           6. There is a relatively new swallowing therapy called VitalStim. It is an electro-therapy  
22 used to re-strengthen the throat muscles. It trains the throat muscles to function again, by using  
23 small electrical currents to stimulate the muscles responsible for swallowing. The success rate  
24 for VitalStim has been huge. This therapy was approved by the FDA in 1997, however, it has  
25 only been widely publicized and recognized as very successful treatment within the past several

Declarant initials: 

1 years

2 7. I was certified to use VitalStim in October of 2004, and I use this therapy on a number of  
3 the patients I work with at the hospital and in residential care. The success rate is overwhelming.

4 8. I am willing to assess Ms. Schiavo and evaluate what happens when food is placed in her  
5 mouth. I then could recommend a course of therapy. Perhaps VitalStim would be beneficial for  
6 Ms. Schiavo as well.

7 9. I believe that Ms. Schiavo needs a chance to be evaluated and treated before her chance is  
8 taken away.

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

11 Executed this 4 day of March 2005, in Abilene, Texas.

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Kyle Jakas M.S.  
15 Kyle Jakas, M.S., Declarant

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