

1 DECLARATION OF RICARDO G. SENNO, M.D., M.S., F.A.A.P.M.R.

2 I, Ricardo G. Senno, 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 specializing in brain injury medicine, and I am currently the  
6 Medical Director of Gentiva Health Services, Rehab Without Walls, which provides  
7 neurorehabilitation services. I reside in Evanston, Illinois.

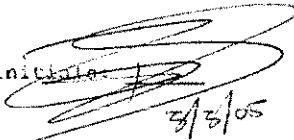
8 2. I am the former Medical Director of the Rehabilitation Institute of Chicago's Brain Injury  
9 Medicine and Rehabilitation Program, where I was a member of the attending medical staff since  
10 1998. I received my Bachelors and Masters Degrees from State University of New York at  
11 Stony Brook, and I completed Medical School at the University of Illinois, Rockford.

12 3. I have not physically examined Ms. Terri Schiavo, nor have I reviewed medical records.  
13 I have, however, observed photographs of her on the Internet. Based on what I have seen, I  
14 believe that she is at least in a Minimally Conscious State (MCS); she does not appear to be in a  
15 Persistent Vegetative State (PVS).

16 4. Judging Ms. Schiavo based on the Rancho Los Amigos Scale, which has ten levels of  
17 cognitive functioning, with level one being representative of coma, I believe she is at worst a  
18 two, if not a three. Again, this is only based on the photographic evidence I have observed.

19 5. I strongly recommend, and I agree to be personally involved if requested, that Ms.  
20 Schiavo receive further medical testing to determine her actual level of cognitive functioning.

21 6. I recommend that Ms. Schiavo receive a Disorders of Consciousness Scale test (DOCS).  
22 This is a detailed mental examination that takes about 30 minutes to one hour to complete. I  
23 have used the results of this clinical tool on patients, and I have been pleasantly surprised by the  
24 results of tests. In this test, 30 objects, or behaviors, are presented to the person, and their  
25 responses are analyzed.

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1 7. Looking at photographs of Ms. Terri Schiavo I saw her mom touching her face and Ms.  
2 Schiavo smiling, basically that is an interaction between a patient and the environment. It is my  
3 medical opinion that that alone would warrant that a full exam be done by a team of specialists in  
4 order to determine her correct status and medical needs.

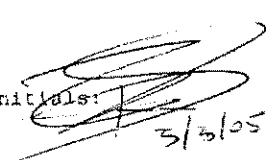
5 8. I recommend that Ms. Schiavo receive an fMRI. A standard MRI or a CAT Scan is not a  
6 sufficient diagnostic tool to determine if she is or is not in a Persistent Vegetative State.

7 9. I believe that proper evaluation is a must on a patient that is at Ms. Schiavo's stage of  
8 recovery; regardless of if they are conscious, minimally conscious, or vegetative. I believe  
9 strongly that her treatment should include the disorders of consciousness scale, which will help  
10 decide what other treatment is appropriate.

11 10. I recommend that Ms. Schiavo also receive a full history and physical exam, including  
12 but not limited to looking at her past medical history, medical records, current medications,  
13 available imaging studies, and current and past laboratory results. For example, it could be that  
14 she is on a narcotic for pain control, and once this medication is removed, she would further  
15 progress. I say this because many medications cause decreased cognitive functioning. A  
16 medical evaluation of that type would likely take 8 or 10 hours of reading through records and a  
17 1 to 2 hour examination of the patient.

18 11. I have developed rehabilitation programs for patients just like Terri Schiavo. Because of  
19 continued advances in medical testing and treatment, even within the past several years, I  
20 believe, from a medical point of view, Ms. Schiavo deserves another evaluation, even if she was  
21 examined just a year ago.

22 12. I have treated patients similar to Terri Schiavo who can swallow minimal amounts of  
23 fluid, but in order to maintain proper nutrition a person needs to ingest a certain amount of fluid  
24 and food per day. Perhaps Ms. Schiavo can't ingest the required amount, but this is something  
25 that could easily be tested. I recommend that she be provided a Modified Barium Swallow

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1 (cookie test) test to assess her swallowing mechanism. This test only takes about an hour.

2 13. In lieu of a Modified Barium Swallow, a Functional Endoscopic Swallow test can also be  
3 done to determine her ability to swallow. Basically, this test puts a camera into the body through  
4 the nose and looks at a person's swallowing function. This test is relatively easy to do, and it  
5 only requires about an hour.

6 14. Again, I am more than happy to assist in this matter by examining Ms. Terri Schiavo,  
7 because I must physically examine her, review medical records, review laboratory results, review  
8 imaging studies, and review current medications in order to provide a medical opinion.

9 15. Leaving all ethical, moral, and legal aspects aside, I believe it is a medical crime not to  
10 evaluate this person.

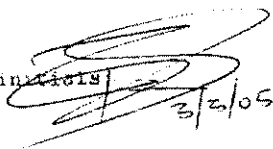
11 16. I have treated patients similar to Ms. Terri Schiavo who have progressed medically. The  
12 speed and level of progression can be very slow. Just because Ms. Terri Schiavo couldn't  
13 physically or mentally do something a year ago, doesn't mean she can't do it today, or tomorrow.  
14 Therefore a complete and proper medical evaluation, based on the most up to date methods, is an  
15 absolute must.

16 17. Over the past several years, the definitions regarding cognitive functioning have been  
17 changing. It used to be that the definition of persistent vegetative state (PVS) was such that a  
18 person did not interact significantly with the environment within a 6 month period, and that is no  
19 longer the current definition. The definition now depends on how they react to their  
20 environment. There are tests to determine the state of someone, such as the DOCS. I believe  
21 that there is a strong possibility that Ms. Terri Schiavo is in at least a MCS state, but this is  
22 something that must be medically tested. Any patient deserves to be tested, and certainly Ms.  
23 Terri Schiavo does also.

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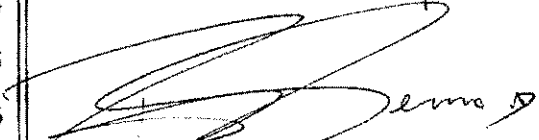
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1 I declare under the penalty of perjury under the laws of the State of Illinois that the foregoing  
2 is true and correct.

3 Executed this 3<sup>rd</sup> day of MARCH 2005, in EVANSTON, Illinois.  
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6   
7 Ricardo G. Senno, M.D, M.S., F.A.A.P.M.R., Declarant  
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