

IN THE CIRCUIT COURT OF THE THIRTEENTH JUDICIAL CIRCUIT  
IN AND FOR HILLSBOROUGH COUNTY, STATE OF FLORIDA  
GENERAL CIVIL DIVISION

ESTATE OF LISA McPHERSON, by and  
through the Personal Representative,  
DELL LIEBREICH  
Plaintiff,

vs.

Case No. 97-01235  
Section "H"

CHURCH OF SCIENTOLOGY FLAG  
SERVICE ORGANIZATION, INC.,  
JANIS JOHNSON; ALAIN KARTUZINSKI;  
and DAVID HOUGHTON  
Defendants.

AFFIDAVIT

STATE OF MICHIGAN  
COUNTY OF MACOMB

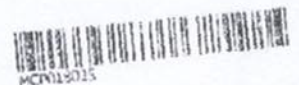
BEFORE ME, the undersigned authority, personally appeared WERNER SPITZ, M.D., who after being duly sworn by me, deposes and says:

1. That affiant is a medical doctor licensed and practicing medicine in the State of Michigan and the attached curriculum vitae is incorporated herein.

2. The affiant has been called upon to express opinions concerning the physical condition and cause of death of Lisa McPherson during her stay at the Fort Harrison Hotel from November 18, 1995, to December 5, 1995. I have reviewed the autopsy photographs, microscopic slides and protocol from the medical examiner's office, the caretaker logs from the Fort Harrison Hotel, the emergency room records of Morlon Plant Hospital, the emergency room records of New Port Richey Hospital, as well as the depositions of Robert Davis, M.D., Joan Wood, M.D., Bonita Portilano, Flynn Lovett, M.D., David Minkoff, M.D., and nurses from the New Port Richey Hospital, i.e., Theresa A. Kilmaszewski, R.N., Richard Pemberton, R.N. and head nurse, Barbara Schmid, R.N.

3. Based upon reasonable medical probability and after review of the above information, affiant has reached the following opinions:

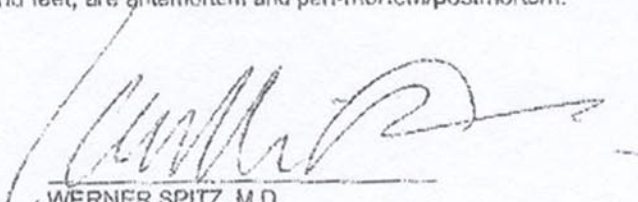
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- (a) That Lisa McPherson was in a coma for at least five to six days prior to her death pronounced on December 5, 1995;
- (b) That Lisa McPherson died as a result of severe dehydration;
- (c) That during the last five to six days of Lisa McPherson's life, it would have been obvious to a person of average intelligence that Lisa McPherson was in need of urgent medical care;
- (d) That the death of Lisa McPherson was not sudden nor accidental;
- (e) That there is no evidence that Lisa McPherson sustained any injury in the motor vehicle accident of November 18, 1995;
- (f) That Lisa McPherson did not die as a result of a pulmonary embolism;
- (g) That the physical condition of dehydration of Lisa McPherson was entirely preventable and reversible had she been taken to competent medical healthcare providers; and
- (h) That the insect bites appearing in the autopsy photographs of Lisa McPherson, and in particular, on her hands and feet, are aitemortem and peri-mortem/postmortem.

FURTHER AFFIANT SAITH NOT

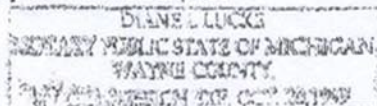
  
 WERNER SPITZ, M.D.

BEFORE ME, personally appeared WERNER SPITZ, M.D., to me well known to be the person described in and who executed the foregoing instrument, and who acknowledged having executed same for the uses and purposes therein set forth.

WITNESS my hand and official seal at St. Clair Shores Michigan, this 30<sup>th</sup> day of August, 1999.

  
 NOTARY PUBLIC

My commission expires:



*Active in Macomb County*

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