

Joseph D. Satterley, Esq. (C.S.B. #286890)
JSatterley@kazanlaw.com
KAZAN, McCLAIN, SATTERLEY & GREENWOOD
A Professional Law Corporation
Jack London Market
55 Harrison Street, Suite 400
Oakland, California 94607
Telephone: (510) 302-1000

Attorneys for Plaintiffs

SUPERIOR COURT OF CALIFORNIA
COUNTY OF ALAMEDA

<p>DENNIS ZAMPA and PAMELA ZAMPA, Plaintiffs, vs. GEORGIA-PACIFIC LLC FKA GEORGIA PACIFIC CORPORATION, et al., Defendants.</p>		<p>Case No. RG16836998 <i>Assigned For All Purposes To Judge George C. Hernandez, Jr., Dept. 17</i> DECLARATION OF DR. GARY J. GADWOOD, M.D. Trial Date: March, 10, 2017 Action Filed: October 28, 2016</p>
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SUPPLEMENTAL DECLARATION OF DR. GARY J. GADWOOD, M.D.

I, Gary J. Gadwood, declare as follows:

I have personal knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those, I am informed and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein.

I have been a licensed physician in the State of California since 1972. My practice is located at 2150 Appian Way, Suite 206, Pinole, California. I have been a practicing general surgeon in California for over 45 years. My qualifications are attached hereto as Exhibit A.

All of my opinions below are given based on a reasonable degree of medical certainty.

I am Anne Zampa's primary care physician. Mrs. Zampa has been my patient for the last four years. I am familiar with Mrs. Zampa and her family, both through my relationship with Mrs. Zampa as her physician, and because I was also the primary treating physician for her son, Dennis Zampa, until he was referred to oncologists for his mesothelioma.

Mrs. Zampa is 80 years old. She has extreme hearing loss. Even with appropriate hearing aids, her hearing has deteriorated to the point that she is nearly deaf and communication with her is extremely difficult if not impossible.

Mrs. Zampa has been diagnosed with dementia, for which the primary symptoms are severe memory loss and confusion. Dementia is a progressive condition (as Alzheimer's disease) marked by the development of multiple cognitive deficits (as memory impairment, aphasia, and inability to plan and initiate complex behavior).

Mrs. Zampa's dementia and deteriorating memory cause her to confabulate or make up stories to fill gaps in her memory. It is my opinion to a reasonable degree of medical certainty that it would not be possible to discern whether any testimony she has about past events is truthful, given that

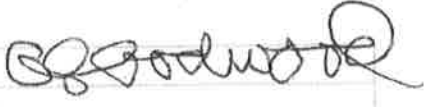
she will make up details to fill in memory loss, without being about to distinguish which details are confabulated and which are in fact based on truthful memories.

Further, given Mrs. Zampa's dementia, severe and permanent hearing loss, her deteriorating memory, confusion, and her severe grief and anxiety over her son Dennis' painful and terminal cancer, if she is required to testify at deposition, the stress of this testimony would exacerbate her problems, and would cause her to become confused to the point that she would be unable to understand if what she was testifying to was truthful or not.

Additionally, given her fragile state, testifying at a deposition would be detrimental to her physical and emotional well-being. Requiring Mrs. Zampa to testify at a deposition or trial would pose a serious risk to her health.

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

Executed March 1, 2017, at Pinole, California.

	 Gary J. Gadwood
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GARY J. GADWOOD, M.D.

**2150 APPIAN WAY, SUITE 206
PINOLE, CALIFORNIA 94564**

Telephone 724-0481

To Whom It May Concern.

RE: CURRICULUM VITAE
GARY J. GADWOOD, M.D.

1. Hastings College, Hastings Nebraska, 1964-1967.
2. University of Nebraska College of Medicine,
Omaha Nebraska, 1967-1971.
3. Highland General Hospital, Oakland, California
Internship, 1971-1972.
4. Highland General Hospital, General Surgical-
Residency, 1972-1976.
5. Private Practice, Family Practice and General Surgery
2727 Macdonald Ave., Richmond, California,
94804, 1976-1986.
6. Private Practice, Family Practice and General Surgery,
2150 Appian Way, Pinole, California,
94564, 1986-Present.