AFFIDAVIT

My name is Harold Weisberg. I reside at 7627 Old Receiver Road (Route 12) Frederick, Maryland.

- 1. For a month beginning the middle of September 1980, I was in Georgetown University Hospital. On September 16 I was operated on to correct an arterial obstruction. In this operation an artificial artery was implanted from my groin to the left knee.
- 2. The day I was released I had to return to the hospital for a second operation. Blood clots had broken loose and entered my left leg and foot. Surgery could cleanse the artery in the leg, but I was informed that the vessels in the foot are inaccessible. I was kept in the hospital for approximately two weeks after this second surgery. During this time I was given anticoagulants and other medication intravenously.
- 3. I live on anticoagulants now, as I have for most of the past five years. After discharge from the hospital, the clotting factor of my blood altered. Until today I was kept at a dosage that is dangerous because I hemorrhaged at that level in April 1979.
- 4. My physical capabilities are considerably reduced now. I can stand without moving for the briefest periods only. My foot and leg remain numb. This creates an additional problem and danger for one of 67 years of age, particularly because of the anticoagulant. The danger is from falling. I can walk but little and I am almost always in varying degrees of pain. An uninterrupted night's sleep is presently impossible. After 30 to 45 minutes, the pain in the foot awakens me. After I have it dependent and then walk around for a bit, I am able to fall asleep again until 30 to 45 minutes later when there is a repetition.
- 5. When I am not abed, my day is even more interrupted because I am to walk more frequently and for short periods, and I do. This further limits what I am able to do. It also interferes with concentration.
- 6. My driving is severely limited. When no other means are available to me, I am permitted to drive to my local doctor's office and to the laboratory at which my blood is tested. The one time I tried this, my leg swelled up an inch and a half in less than 15 minutes,

- 7. On Wednesday, October 29, I was again examined at Georgetown University Hospital. It was then indicated to me that, while I may expect varying degrees of recovery from some of the symptoms indicated above, it will take time.
- 8. The trip to the hospital tired me excessively, even though I did not drive.
- 9. After the first of these recent operations, I suffered further venous thrombosis. The first of these of which I am aware was diagnosed in October 1975, when I was informed that the main veins in both legs and thighs had been damaged, some beyond repair. This, earlier, did limit what I was able to do.
- 10. That I have impaired circulation in both the veins and the arteries causes additional medical problems because what is indicated for one condition is contraindicated for the other condition.
- 11. Still other circulatory problems impose other limitations on me.

 Prior to the recent surgery, I had to be careful in bending over and straightening up because of a balance problem. In addition, I was not able to cope with more than one flight of stairs at a time. In practice and for the present and the immediate future, this and the other medical limitations reported in the precedings paragraphs effectively deny me access to most of my records. They are filed in the basement of our home. They are accessible to me now only when others can get them for me.

HAROLD WEISBERG

FREDERICK COUNTY, MARYLAND

Before me this 31st day of October 1980 Deponent Harold Weisberg has appeared and signed this affidavit, first having sworn that the statements made therein are true.

My commission expires July 1, 1982.

NOTARY PUBLIC IN AND FOR FREDERICK COUNTY, MARYLAND