

~~CONFIDENTIAL~~

1. DECLARATION OF DR. PAUL R. PATEK, PH.D.

2 My name is Dr. Paul R. Patek. I make this following
3 declaration under the penalty of perjury.

4 I hold the degree of Doctor of Philosophy (Ph. D.)
5 in anatomy and biological sciences, graduating from the University
6 of Southern California in 1938.

7 I am presently Professor and Chairman of the Department
8 of Anatomy in the University of Southern California School of
9 Medicine, 2025 Zonal Avenue, Los Angeles, California.

10 In addition, I am currently active and have been
11 active in the past in research in the ^{field} ~~field~~ ^{of Gross} ~~of Gross~~ Anatomy
12 and have published numerous papers dealing with that subject.

13 In my capacity as Professor and Chairman of the Depart-
14 ment of Anatomy in the School of Medicine in the University of
15 Southern California, I am familiar with all of the Courses of
16 our department, and have become familiar with other courses in the
17 department of Biology at the University of Southern California,
18 particularly those which deal with Human Anatomy.

19 The only course at the University of Southern California
20 which involves students dissecting individual Human Cadavers is
21 Anatomy 501, Gross Human Anatomy, which is a complete dissection of
22 the Adult Human Body. In this Course, 4 (four) students are
23 assigned to one cadaver; and in this course personally dissect
24 the Human Body. The assignment of 4 (four) students to a body
25 is a standard assignment throughout the Medical Schools in the
26 United States, a fact with which I am personally familiar. I know
27 of no standard recognized course in Human Gross Anatomy, other than
28 in perhaps individual research in Human Gross Anatomy, where the
29 individual dissection is conducted by the students where as few
30 as only 2 (two) students dissect on each body; such 2 (two)
31 students per body dissection would not be in keeping with efficient
32

1 and economical use of cadavers, which are, at least periodically,
2 in short supply in many areas of the United States.

3 I have, at the request of Roger S. Hanson, Attorney
4 at Law, examined the undergraduate University of Southern California
5 academic transcript of one DE WAYNE ALLEN WOLFER, and I note
6 thereon a course he completed in the 1949-1950 academic year
7 entitled Zoology 312, a four (4) semester credit course, called
8 Human Anatomy, for which he received a grade of B.

9 I have examined the appropriate pages of the 1949-1950
10 general catalog of the University of Southern California, setting
11 forth course offerings of the Department of Zoology. I note at
12 page 86 (see attached Xeroxed pages) Zoology Course 312, "Human
13 Anatomy". This is the course completed by Mr. Wolfer. It
14 consisted of lectures and perhaps four (4) or five (5) demonstrations
15 each year, conducted by graduate students in the anatomy department.
16 This course was taught at that time by Professor Baldwin, now
17 deceased.

18 In support of the above, I append to this declaration
19 all relevant materials that I have consulted in arriving at my
20 statements contained above and below.

21 There appears to be no other course on Mr. Wolfer's
22 academic record dealing with Human Gross Anatomy other than
23 Zoology 312, and I am personally familiar with the contents of
24 the other courses connected with the Biological sciences for
25 which he has received credit during his undergraduate career at
26 the University of Southern California. None others deal with Human
27 Gross Anatomy. This course that he completed, Zoology 312, was
28 given primarily for physical education majors. It was a
29 superficial, cursory course compared to the standard dissection
30 course 501 Gross Human Anatomy given under my direction at the
31 University of Southern California Department of Anatomy. The
32 501 course is the customary course given to Medical Students and

1 graduate students in the field of Anatomy. A single cadaver
2 was used for the ENTIRE class in Zoology 312, and usually about
3 30 students enrolled, although this amount varied. In this course,
4 Zoology 312, individual class students such as Mr. Wolfer did
5 not personally participate in the dissection of that single
6 cadaver. In no sense would "two students" be assigned to dissect
7 that single cadaver in Zoology 312.

8 In this respect, I have personally examined page
9 8375, lines 10-18 of People v. Jack Kirschke, and can state
10 that the testimony given by Mr. Wolfer where he claims "two men
11 were assigned a cadaver and we dissected the entire cadaver
12 from top to bottom," is FALSE and not TRUE and is contrary
13 to my personal knowledge of the content of Zoology 312 as
14 taught by Professor Baldwin in 1949-1950.

15 In fact, the single cadaver used in Zoology 312
16 was never totally dissected, being used for two or more years.

17 All dissections in Zoology 312 were done by Dr.
18 Baldwin's graduate students ONLY, and these graduate students
19 did most of the demonstrations for the students enrolled in that
20 course.

21 In addition, I have personally examined the testi-
22 mony adduced in the Reporter's Partial Transcript at pages 13-15
23 of People v. Albert Maurice Hodge, Number 92475, Santa Barbara
24 County Superior Court, given by Mr. Wolfer. This document is
25 herewith appended. I find this testimony FALSE for the same
26 reasons set forth above, viz:

27 (1) Never were 2 (two) students only assigned
28 to the Human Body for dissection purposes (lines 12-28, page 13).

29 (2) The dissection was not done in a six (6)
30 foot by two (2) foot room, and there was no need nor opportunity
31 for the undergraduate students such as Mr. Wolfer to "go to lunch
32 with embalming fluid on their hands;" these students in Zoology

1 312, the previously mentioned course completed by Mr. Wolfer,
2 did not personally participate in the dissection of the single
3 cadaver used in this course, Zoology 312.

4 There are, furthermore, no rooms of size six (6)
5 feet by two (2) feet designed and used for dissecting of
6 cadavers. In Zoology 312, the room was sufficient in size to
7 allow and to accomodate numerous students in a demonstration
8 surrounding.

9 Further, I have examined the testimony given
10 under oath by De Wayne Allen Wolfer in his deposition taken in
11 the case C-8080, Wolfer v. Blehr, a copy of which is being
12 lodged with this Court as an Exhibit, and I find much of the
13 testimony false at pages 72-78 which was given by Mr. Wolfer,
14 for the foregoing reasons which I have heretofore set forth.

15 In conclusion, it appears to me that the person
16 Mr. Wolfer who is testifying to procedures used in Human Gross
17 Anatomy courses alledgedly taken by himself at the University of
18 Southern California is quite unfamiliar with the methods and
19 techniques used in those dissection/ and/ or demonstration
20 courses, or he otherwise wilfully proffers false testimony
21 whenever he has testified.

22 It is my opinion that Mr. Wolfer never participated
23 in a Human Gross Anatomy Course at the University of Southern
24 California where he, along with another student, personally
25 dissected a Human Cadaver.

26 Under the penalty of perjury I declare the foregoing
27 to be true and correct this _____ day of June, 1972.

28
29
30 _____
31 Paul R. Patek

32 Professor of Anatomy and Chairman of
the Department

University of Southern California
School of Medicine