

EXHIBIT “D”

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CAUSE NO. 2026-35830

ANNELISE CAMP, AN INCAPACITATED
PERSON, AND JOY CAMP AND
JOHNSTON CAMP, AS NEXT OF KIN
ON HER BEHALF,

Plaintiffs,

v.

TEXAS CHILDREN'S HOSPITAL and
TEXAS CHILDREN'S HOSPITAL WEST
CAMPUS and DR. MONA
KARIMULLAH, M.D.,

Defendants.

IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

164th JUDICIAL DISTRICT

**DECLARATION OF BRIAN BARNETT IN SUPPORT OF DEFENDANTS TEXAS
CHILDREN'S HOSPITAL AND DR. MONA KARIMULLAH'S RESPONSE TO
PLAINTIFF'S EMERGENCY MOTION TO STAY ENFORCEMENT
OF THE RULE 11 AGREEMENT**

I, Brian Barnett, make the following declaration in support of Defendants Texas Children's Hospital ("TCH") and Dr. Mona Karimullah (collectively, "Defendants") Response to Plaintiffs' Emergency Motion to Stay Enforcement of the Rule 11 Agreement:

1. My name is Brian Barnett. I am over 18 years of age, of sound mind, and capable of making this declaration. The facts stated in this declaration are within my personal knowledge and are true and correct.

2. I am the Director of Transport/Transfer Center for Defendant TCH. I am familiar with TCH's efforts to facilitate Plaintiff Annelise Camp ("Annelise") to another medically appropriate facility per the request of Plaintiffs.

3. Since May 29, 2026, a total of 36 facilities have been formally contacted regarding the potential transfer of Annelise into their care. These 36 facilities are located in and outside of

Texas and include facilities in Arkansas, Louisiana, New Jersey, New Mexico, Missouri, and Oklahoma.

Of the 36 facilities that have been formally contacted regarding Annelise's potential transfer into their care, 35 facilities have declined to accept Annelise's transfer. A transfer request remains pending at one of the 36 facilities that were contacted. This facility cannot consider Annelise as a potential transfer patient without having death by neurologic criteria test results.

6. Additionally, following a telephone conference initiated by the family on the afternoon of June 8th, a second, separate formal transfer request was made to a medically appropriate facility which had already denied a formal physician to physician request for transfer several days ago. This facility has again declined to accept Annelise's transfer.

My name is Brian Barnett, my date of birth is 6/20/1982, and my business address is 6621 Fannin Street, Houston, Texas, 77030, United States. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Harris County, State of Texas, on the 9th day of June, 2026.



Brian Barnett

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Vilma Yanes on behalf of Kevin Yankowsky

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