

Unofficial Copy Office of Martin Burgess District Clerk

Exhibit B

**Dr. Joseph Varon Verification by Unsworn Declaration Under
Penalty of Perjury**

**VERIFICATION BY UNSWORN DECLARATION UNDER PENALTY OF
PERJURY**

(Tex. Civ. Prac. & Rem. Code § 132.001 & 28 U.S.C. §1746)

1. My name is Dr. Joseph Varon. I am of legal age and a medical doctor in Houston, Texas.
2. I am the Chief of Critical Care Services of United Memorial Medical Center and United General Hospital and previously Chief of Staff at University General Hospital in Houston, Texas. Also, I am a Professor of Acute and Continuing Care at the University of Texas Health Science Center and Professor of Medicine, Surgery and Emergency Medicine at several universities in Mexico. After completing medical training at the UNAM Medical School in Mexico City, Mexico, I did an internship in internal medicine at Providence Hospital/George Washington University, Washington, D.C, then residency in internal medicine at Stanford University and fellowships in critical care medicine and pulmonary diseases at Baylor College of Medicine. I have written over 800 peer-reviewed articles, 10 full textbooks, and 9 dozen book chapters. I am a reviewer for multiple journals and the Editor-in-Chief for Critical Care and Shock and Current Respiratory Medicine Reviews. I have won many prestigious awards for top physicians in the USA. I am known for my groundbreaking contributions to Critical Care Medicine in the fields of cardiopulmonary resuscitation and therapeutic hypothermia. I am also affiliated with medical facilities such as HCA Houston Healthcare Medical Center and Houston Methodist Hospital.
3. I have numerous medical Board certifications, including in critical care, IMED-Pulmonary Diseases, and IMED-General Medicine. I have had fellowships on Pulmonary Diseases, Critical Care Baylor College of Medicine Houston, Texas.
4. In the past two (2) days I have reviewed the medical records for Baby Nick who is currently in the Texas Children Hospital, in the Medical Center, Houston, and I have agreed to assist the parents in transferring Baby Nick from the TCH to their home. Free of charge.
5. The Harris County Medical Examiner's Office as issued a letter allowing the TCH to deliver Baby Nick to his parents, so now there appears to be no legal impediment to do so.
6. What remains are complicated medical logistical issues, which we have nearly resolved. We are finalizing arrangements to have the necessary medical equipment at the home, and the necessary hospice care for Baby Nick. The ambulance transportation is also being coordinated.
7. I am currently treating a lot of COVID-19 patients and am extremely busy, but I am confident that we will be able to transfer Baby Nick out of the hospital and deliver him home within the next 24 to 48 hours. I am in fact hopeful that it will be done on Tuesday, October 13, 2020, in the afternoon.
8. So all we need is a little more time, 24 to 48 hours, to accomplish this. And we need the courts of law to allow us this time to finalize the plan and execute.
9. With the courts' assistance, this matter can come to a sensible closure.

Pursuant to Tex. Civ. Prac. & Rem. Code § 132.001 & 28 U.S.C. §1746, I hereby submit this Unsworn Declaration Under Penalty of Perjury, in Harris County, Texas, and confirm it by my signature below on October 12, 2020:

By: _____

Dr. Joseph Varon

