

**AFFIDAVIT OF**

The undersigned, being first duly sworn and upon oath, attests to the following:

1. My name is \_\_\_\_\_ . I had a high school diploma but no medical training. I am \_\_\_\_\_ years of age. I reside at \_\_\_\_\_

My telephone number is \_\_\_\_\_

2. I worked at Dr. Leroy Carhart's Abortion and Contraception Clinic of Nebraska from April (?) of 2001 until Aug. of 2003 when I resigned. I was recently married. My name while employed at the ACCN was Sonja Catt. I have personal knowledge of all things to which I attest herein.

3. When I first started I would check in patients, do the counseling explaining to them the procedure and giving them their medicine such as Butiset. Two months later they put me another girl in the lab where we would switch off drawing blood, starting I.V.'s, doing the urine analysis, checking sugar levels if they were over 12 weeks. We would then "prep" the procedure rooms, getting the instruments ready for the doctor, making sure everything was stocked.

4. I did both primary and secondary care. Primary consisted of handing the doctor the instruments and checking to make sure he got everything such as the placenta, fetal parts ect. We would then take a picture of it. Secondary consisted in watching the exometer, the pulse machine, the heart waves, holding the ultrasound probe and administering the IV medications. I was trained mainly by the nurse, Sherry Hron, but I learned to draw blood from another co-worker.

5. There were also regular patients who would come for flu shots and depo shots and I would administer them as well. I basically did everything.

6. I would never have Leroy Carhart for a doctor. He always acted drugged up. He lost his balance alot when he walked. Sometimes he would bump into doorframes. His hands shook when he did procedures. He would lay down between patients and we would have to find him and wake him up. In the two years I worked there, I never once saw Dr. Carhart wash his hands. He wouldn't even wash his hands before he ate.

\_\_\_\_\_  
**DATED**

SWORN TO, ACKNOWLEDGED AND SUBSCRIBED BEFORE ME THIS \_\_\_\_\_ DAY OF SEPTEMBER, 2009 BY