

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

LISA TORREY, *et al.*,

Plaintiffs,

v.

INFECTIOUS DISEASES SOCIETY OF
AMERICA, *et al.*,

Defendants.

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CIVIL ACTION NO. 5:17-cv-00190-RWS

DECLARATION OF ELIZABETH L. MALONEY, MD

I, Elizabeth L. Maloney, M.D do hereby declare as follows:

1. I am a licensed physician and I am the president of Partnership for Tick-borne Diseases Education. I am currently based in Minnesota.
2. At the request of counsel for the Plaintiffs, I agreed to work with Dr. Dina Torten to find a qualified independent medical examiner for the Plaintiffs in this case.
3. I recommended doctors who have experience in diagnosing and treating Lyme disease, including some physicians who have published articles on Lyme disease that are listed on PubMed, one of whom is also an IDSA member.
4. Dr. Torten recommended doctors that I believe are not qualified to act as independent medical examiners.
5. To the best of my knowledge, the doctors recommended by Dr. Torten are all members of the IDSA and none of them have significance experience or any particular expertise with diagnosing or treating complex cases of Lyme disease. None have published an article on Lyme disease that is listed on PubMed.

6. Dr. Torten told me that she could only recommend doctors from the state of Texas and would only recommend doctors who are infectious disease doctors.

DECLARATION UNDER PENALTY OF PERJURY

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on May 22, 2019.

Elizabeth Maloney, MD

Elizabeth L. Maloney, M.D