

Declaration of Robert D. Crockett

I, Robert D. Crockett, declare as follows:

1. I am counsel admitted pro hac vice for NXIVM Corporation in this matter. I make this declaration in support of an emergency motion for reconsideration of NXIVM's request for a brief trial adjournment.

2. While traveling back from a court hearing in Ventura County, California on December 12, 2017, I started to lose sight in my right eye. I had had cataract replacement surgery on that eye in August, 2017.

3. I was not able to get in to see my ophthalmologist until Friday, December 15, 2017, who immediately sent me to a retina specialist, who then undertook emergency retina reattachment surgery on Saturday, December 16, 2017.

4. My surgery occurred in Santa Barbara on December 16, 2017. Dr. Ma'an A. Nasir performed the surgery and laser-stitched six retinal tears. He put in place what is known as a "six-week" gas bubble, which holds the stitching in place. The bubble at six weeks is reabsorbed. I won't know that it is reabsorbed until the bubble disappears and I can see around the bubble.

5. Because the bubble was inserted at sea level, I cannot deviate more than 2000 feet from sea level as the bubble will expand, burst and I could lose my vision. The mountain pass between my office and downtown Los Angeles, where I practice, is over 2100 feet and I have had extensive discussions with the surgical nurses about ways to get around that. I live at 1400 feet and I am required to take pauses as I ascend from sea level to my house. Jet airliners are pressurized to 5000 feet. The lowest train route across the United States would take me through a pass at El Paso, with an elevation of more than 3000 feet.

6. Yesterday I attempted to get a letter from Dr. Nasir. He is on vacation until the first week of January. His office will not permit another doctor in his office to sign a letter for me. His office has sent me by mail the records which apparently contain the 2000 foot recommendation. I have not received those records.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct and that this declaration was executed at Santa Clarita, California on December 22, 2017.



Robert D. Crockett

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