IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

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LISA SYKES, et. al.	:	
Plaintiffs,		
	:	Case No: 3:07-CV-660
v.		(E.D. Virginia, Richmond Division)
	:	
BAYER CORPORATION		
	:	
Defendant.		
	:	

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DECLARATION OF DR. KATHLEEN STRATTON

1. I, Kathleen Stratton, am over the age of eighteen and make this declaration based on personal knowledge, in support of Dr. McCormick's Motion to Quash Subpoena in the above-captioned proceeding.

2. I am employed by the National Academy of Sciences ("the Academy"), and have been employed at the Academy for over 18 years.

3. I served as Study Director for the work performed by the Immunization Safety Review Committee (the "Safety Committee").

4. In selecting the volunteer scientists who served on its various study committees, the Academy examines three aspects of each potential candidate's background: (1) expertise relevant to the committee's task; (2) possible conflicts of interest; and (3) potential sources of bias. The term "conflict of interest" encompasses any current financial or other interest that could impair an individual's objectivity. The term "potential source of bias" encompasses an individual's points of view or positions that are largely intellectually motivated, or that arise from a close identification or association with a point of view of a particular group.

5. In determining whether a potential conflict of interest exists in a proposed candidate, the Academy solicits information from the candidate. This information is solicited with the assurance that it will be treated as confidential. As part of its selection process, the Academy also provides public notice of the candidates it intends to appoint to each committee, and affords the public an opportunity to comment on the proposed candidates.

6. In selecting members for the Safety Committee, the Academy precluded participation by anyone holding a financial interest in a vaccine manufacturer or the parent of a vaccine manufacturer; anyone who was receiving research funding from a vaccine manufacturer or the parent of a vaccine manufacturer; anyone who had previous service on a major vaccine advisory committee; and anyone who had given prior testimony or authored publications on vaccine safety. Further, an individual could serve on the Committee if he or she received funding from the Centers for Disease Control (CDC) or the National Institutes of Health, provided, however, that such funding was not vaccine safety work. In addition, any funding from CDC could not be current or recent. The individuals who were appointed to serve on the Safety Committee were determined to have met these criteria.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Kathleen Stratton, Ph.D.

April 9, 2008