

# EXHIBIT B

Cause No. 48-112330-19

T.L., A MINOR	§	IN THE DISTRICT COURT
AND MOTHER, TRINITY LEWIS,	§	
ON HER BEHALF	§	
	§	
PLAINTIFFS,	§	
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
COOK CHILDREN'S MEDICAL	§	
CENTER,	§	
	§	
DEFENDANT.	§	48 <sup>TH</sup> JUDICIAL DISTRICT

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DECLARATION OF TRINITY LEWIS

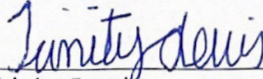
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Pursuant to 28 U.S.C. §1746 and Texas Civil Practice & Remedies Code §132.001, I hereby declare as follows:

1. My name is Trinity Lewis. I am over twenty-one (21) years of age. I am of sound mind and fully competent to make this Declaration. I am T.L.'s mother and have personal knowledge of the facts set forth in this Declaration and they are true and correct.
2. Since her trach procedure, T.L.'s stats have periodically reached the 90s, which is a marked improvement.
3. T.L. is not in a constant state of pain; T.L. has noticeable changes of expressions, such as grimacing when she is unhappy and being calm when she is content. She clearly enjoys sitting in my lap. Attached as Exhibit C is a true and correct copy of a photograph I took on April 12, 2021 at 3:49 pm.
4. Now that she is completely awake, T.L. is doing "baby things" like reaching for items within her line of sight.
5. T.L. is no longer receiving a paralytic. Since receiving her tracheostomy on or around March 30, 2021, T.L. has been able to be weaned off the paralytic medication called vecuronium. The weaning of this medication was completed on or around April 8, 2021. (Page 125 of medical records).
6. T.L. has been weaned off the sedation medicine Precedex. The sedation medicine Methodone has been started on a weaning schedule.
7. The hospital's therapy team has been sitting T.L. up in a wheelchair most days.

8. I took the attached video which shows T.L. on April 27, 2021 at 12:51 p.m., moving her legs in response to therapy commands. The copy of the video attached as Exhibit F to this filing is an unedited, true and correct copy of the original.
9. Based on medical records (page 133), T.L. has been stable on the ventilator.
10. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Tarrant County, State of Texas, on the 4th day of May 2021.

  
Trinity Lewis

# EXHIBIT D

Cause No. 48-112330-19

T.L., A MINOR  
AND MOTHER, TRINITY LEWIS,  
ON HER BEHALF

PLAINTIFFS,

v.

COOK CHILDREN'S MEDICAL  
CENTER,

DEFENDANT.

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IN THE DISTRICT COURT

TARRANT COUNTY, TEXAS

48<sup>th</sup> JUDICIAL DISTRICT

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DECLARATION OF EMILY K. COOK

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Pursuant to 28 U.S.C. §1746 and Texas Civil Practice & Remedies Code §132.001, I hereby declare as follows:

1. My name is Emily K. Cook. I am over twenty-one (21) years of age. I am of sound mind and fully competent to make this Declaration.
2. Plaintiffs have received medical records of Tinslee Lewis that cover through April 15, 2021.
3. The week of April 26, 2021, Plaintiffs have requested medical records covering April 16th and beyond.
4. During the week of April 19, 2021, I reached out to potential facilities who had in 2019/2021 indicated a willingness to consider T.L. for transfer once she had a tracheostomy and G-tube.
5. During the week of April 26, 2021, two of those facilities contacted me.
6. Over the past two weeks, I have been communicating with caseworkers from a facility in Houston and a facility in East Texas. The East Texas facility began receiving updated medical records on Friday, April 30 and currently awaiting review by their nurse practitioner as of May 4, 2021.. The Houston facility is still waiting for updated records from Cook Children's.
7. On Friday, April 30, I verified with legal counsel of the relevant state agency and with representatives from Tinslee's managed care organization that no such

investigation was ongoing, nor were there any plans to "intervene" as Defendant's motion posits. I spent roughly six hours on the phone with relevant officials attempting to find out information supporting the Defendant's allegation, and came up empty-handed. On May 5, 2021, I received further confirmation that after checking with Medicaid staff, the program is not looking to insert itself in this dispute as the Defendant alleges.

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

Executed in Harris County, State of Texas, on the 5<sup>th</sup> day of May 2021.

  
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Emily K. Cook