

State of Missouri)
) SS
City of Saint Louis)

Affidavit of Carolyn Moore

Before me, the undersigned authority, personally appeared Captain Carolyn Moore, who being by me duly sworn, deposed as follows:

- 1 My name is Carolyn Moore. I am of sound mind, over the age of eighteen, capable of making this affidavit, and personally acquainted with the facts herein stated.
- 2 I am employed with the Saint Louis Fire Department as a Captain.
- 3 I am a custodian of the records of the City of Saint Louis Fire Department.
- 4 In settlement of the case *Myers v. Saint Louis Fire Department*, case number 1422-cc01250, I have compiled a spreadsheet consisting of the "Problem" and "Priority" fields from each of the Medical Dispatch Agency Incident Reports for every 911 call for ambulance service to the Planned Parenthood located at 4251 Forest Park Avenue, Saint Louis, Missouri 63108, from January 1, 2009, through April 6, 2016.
- 5 The spreadsheet provided to Deborah Myers consists of 2 pages and provides information from the Medical Dispatch Agency Incident Reports resulting from 58 separate calls for service from January 1, 2009, through April 6, 2016.
- 6 The entries contained in the spreadsheet I compiled are the verbatim entries contained in the "Problem" and "Priority" fields of the Medical Dispatch Agency Incident Reports.
- 7 The column labeled "problem" is organized in alphabetical order and these entries bear no association to any date or time or any particular record. However, the "Problem" and "Priority" entries are related to each other such that each row in the spreadsheet comes from the same report.

- 8 I am executing this affidavit on May 3, 2016.
- 9 I certify under the penalty of perjury that the statements above are complete, true and accurate to the best of my knowledge and belief.

Carolyn Moore
Affiant

Subscribed and sworn to before me this 3rd day of May, 2016.

My Commission Expires:

Sharon E. Holmes
Notary Public

