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26 **UNITED STATES DISTRICT COURT**  
27 **CENTRAL DISTRICT OF CALIFORNIA**  
28 **SOUTHERN DIVISION**

29 AARON KHERIATY, M.D.,  
30  
31 Plaintiff,  
32 v.

Case No.: 8:21-cv-01367 JVS (KESx)

**DECLARATION OF PETER A.  
MCCULLOUGH, MD, MPH IN  
SUPPORT OF PLAINTIFF’S REPLY  
TO DEFENDANTS’ OPPOSITION**

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THE REGENTS OF THE UNIVERSITY  
OF CALIFORNIA, a corporation, *et al.*,  
  
Defendants.

**TO PLAINTIFF’S MOTION FOR  
PRELIMINARY INJUNCTION**

Date: September 27, 2021  
Time: 1:30 pm  
Place: Courtroom 10C  
Judge: Hon. James V. Selna

I, Peter A. McCullough, MD, MPH, declare as follows:

- 1. I am an adult of sound mind and make this statement voluntarily, based upon my own personal knowledge, education, and experience.
- 2. I provide herein a limited response to the expert declarations filed by Defendants which I reviewed in full.
- 3. I have reviewed and agree with, and hereby incorporate by reference, the sworn written testimony in the Reply declaration filed by the UC Faculty, dated September 13, 2021.
- 4. I also add that, in addition to the education, experience, and credentials detailed in my original Declaration, I add the following to my qualifications:
  - a. I diagnose and treat COVID-19 as a part of my practice.
  - b. I have a master’s degree in public health in epidemiology from the University of Michigan.
  - c. I am an internist, cardiologist, and epidemiologist. I maintain American Board of Internal Medicine certification in internal medicine and cardiovascular diseases. I practice both internal medicine, including the management of common infectious diseases, as well as the cardiovascular complications of both the viral infection and the injuries developing after the COVID-19 vaccine.

1 d. I have 46 peer-reviewed publications regarding SARS-CoV-2 and  
2 COVID-19.

3 e. I have had more than one full-year of dedicated academic and clinical  
4 efforts in combating the SARS-CoV-2 virus and in doing so, have  
5 reviewed thousands of reports, participated in scientific congresses,  
6 group discussions, press releases, and have been considered among the  
7 world's experts on COVID-19.

8 f. My expertise on the SARS-CoV-2 infection and COVID-19 syndrome,  
9 like that of all infectious disease and other specialists, including  
10 Defendants' experts, is approximately 19 months old.

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12 I declare under penalty of perjury under the laws of the United States of America that the  
13 foregoing is true and correct this 13th day of September 2021, at Dallas, Texas,  
14 USA.

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19 Peter A. McCullough, MD, MPH