

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
CIVIL ACTION NO. 11-CV-22026-MGC

_____)
DR. BERND WOLLSCHLAEGER, et al.)
)
Plaintiffs,)
)
v.)
)
RICK SCOTT, <i>In his official capacity as</i>)
<i>Governor of the State of Florida, et al.</i>)
)
Defendants.)
)
_____)

**DECLARATION OF BRUCE MANHEIM, JR. IN SUPPORT OF
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

I, Bruce Manheim, Jr., hereby declare as follows:

1. I am a member of the bar of both the State of California and the District of Columbia. I am a partner at the law firm of Ropes & Gray, LLP, which represents the Plaintiffs in the above-captioned action.
2. I have personal knowledge of the facts presented in this Declaration based upon my review of documents relating to this litigation. I respectfully submit this Declaration in support of Plaintiffs' Motion for a Preliminary Injunction.
3. Attached as Exhibit 1 is a true and correct copy of CS/CS/HB 155, "An act relating to the privacy of firearm owners," codified at Fla. St. §§ 790.338, 381.026, and 456.072 (the "Physician Gag Law").
4. Attached as Exhibit 2 is a true and correct copy of an article titled "Family and Pediatrician Tangle Over Gun Question" written by Fred Hiers and published on July 23, 2010

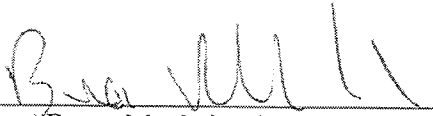
on Ocala.com, a website associated with the Ocala Star-Banner newspaper, available at <http://www.ocala.com/article/20100723/news/100729867/1402/news?p=1&tc=pg&tc=ar> (last accessed June 22, 2011).

5. Attached as Exhibit 3 is a true and correct copy of an April 7, 2011 Staff Analysis, Health & Human Services Committee of the Florida House of Representatives (the "Health & Human Servs. Comm. Report") regarding the Physician Gag Law.

6. Attached as Exhibit 4 is a true and correct copy of an April 12, 2011 Staff Analysis, Judiciary Committee of the Florida House of Representatives (the "Judiciary Comm. Report") regarding the Physician Gag Law.

7. Attached as Exhibit 5 is a true and correct copy of a Meeting Report for a meeting of the Florida Board of Medicine Rules/Legislative Committee that took place on June 2, 2011.

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



Bruce Manheim, Jr.

Executed on June 23, 2011