

9. In May of 2017, approximately a month after the clinic closed, all of Bossier's business records, patient files, and all other documents were shredded. The only purpose I had in doing so was to to make sure that patient confidentiality was protected and to avoid the cost of continued storage.
10. I did not retain any of Bossier's documents, and to the best of my knowledge, all of Bossier's documents were shredded in May of 2017.
11. My longtime colleague Robert Gross is very ill and lives in Texas, so I did not know anyone was trying to serve a subpoena or court documents at his residence. When I found out, I contacted my former attorneys and then I retained a new attorney.
12. At the request of the Louisiana Attorney General's Office, I have authorized Bossier's former attorneys to search their records for documents that might be responsive to the subpoena. My understanding is that the search for documents is underway, and that Bossier's former attorneys intend to complete the search as expeditiously as possible.

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


Roncal Martin

July 3, 2018
Date: