

DECLARATION OF MELANIE KHOURY SAWAYA

Electronically FILED by
Sharon A. Ardu, Clerk of Court
County of Los Angeles
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David W. Slayton, Clerk of Court

Expert Analysis and General Educational Statement

(Cosmetics / Special Effects (SFX) / Skincare Focus)

Reviewer: Melanie Khoury Sawaya

Discipline: Makeup, Special Effects (SFX), Skincare

Business Location: Sierra Madre, California

Date(s) of Review: January 18, 2022 and November 4, 2023

Scope and Limitations

- This declaration is based solely on my professional background in makeup, special-effects (SFX), and skincare artistry.
- I am not a medical professional and am not offering medical opinions, diagnoses, or legal conclusions.
- My analysis and statements are based on visible surface characteristics observed in photographs and on my experience with cosmetic and SFX applications and post-procedure appearances.
- Lighting, camera settings, and image quality can affect appearance.

I. Expert Analysis (Photo-Only; Cosmetics/SFX Focus) — January 18, 2022

Neck – Side Profile (Coloration Observed)

- Coloration appears diffuse and flat, resembling a surface wash of color rather than irregular internal mottling.
- Edges are soft and uneven, consistent with pigment that has been rubbed or feathered.
- Lighter streaks or voids within the colored area appear consistent with partial rub-off or smear.
- Skin texture (pores/follicles) remains visible through the coloration, suggesting a topical product on the surface of the skin.

Under-Eye & Cheek – Frontal View

- Under-eye coloration reads as even shading with smooth borders, rather than the irregular, multi-tone variation often seen when color develops below the skin surface.
- Reflective particles are visible under the eye and on the cheek area, consistent with cosmetic shimmer or micro-glitter.
- A surface sheen and streaking pattern is present, consistent with pigment breakdown with warmth or perspiration.
- No conspicuous surface puffiness is apparent in these photos.

Visual Consistency Checks (Non-Medical)

- Patterning: No repeated or clear shapes (e.g., hand/finger outlines) are visible.

- **Color Variation:** The coloration appears uniform and even across large areas.
- **Edge Behavior:** Edges appear feathered/blended, similar to applied pigment rather than subsurface discoloration.

Indicators Suggestive of Topical Product (Cosmetics/SFX Perspective)

- **Uniformity:** Smoother, more even color fields than typical subdermal color change.
- **Surface Cues:** Visible reflective particles and surface shine consistent with cosmetic product.
- **Transfer/Breakdown:** Streaking/separation patterns consistent with rub-off or sweat-related pigment movement.
- **Lack of Visible Puffiness:** No notable surface contour change observed in these images.

Conclusion to Section I (Observational; Cosmetics/SFX Only):

Based on the visible surface characteristics in the submitted photographs—flat, blended coloration; streaking consistent with surface pigment movement; and reflective particles typical of cosmetic products—the observed color patterns are more consistent with topical cosmetic application than with color that develops beneath the skin. This observation does not address medical causation or any legal question.

II. General Characteristics of Post-Injection (Lip Filler / Lip-Flip) Appearance — November 4, 2023

(Educational and cosmetic context only)

Immediate and Short-Term Effects (0–48 hours)

- **Swelling:** Mild to moderate, generally smooth and uniform along the lip border; most noticeable near injection entry points.
- **Tenderness:** Lips may feel firm or tight; mild numbness/tingling can occur from topical anesthetics or lidocaine-based filler.
- **Color Change:** Small bluish or purplish marks can appear where the needle entered—typically round/oval, well-defined, and localized.
- **Shine/Gloss:** Lips often appear glossy due to ointment (e.g., Arnica, Aquaphor) or mild surface tension from swelling.

Intermediate Healing (2–5 days)

- **Swelling Reduction:** Edema gradually subsides; lips soften.
- **Bruise Evolution:** Color may darken to purple-blue, then fade to green-yellow before clearing; marks generally remain localized near entry sites.
- **Texture:** Skin remains intact and smooth without abrasions or crusting.

Differentiating Features (Cosmetic Observation Perspective)

- **Pattern:** Injection-related effects are often symmetrical and follow a predictable line; trauma-related color may be irregular/asymmetrical.

- Depth & Contour: Post-injection swelling tends to be evenly puffy; trauma may show uneven or indented areas.
- Color Transition: Needle-related bruising is usually small/localized; traumatic bruising may spread more diffusely.
- Surface Integrity: Overlying epidermis is typically unbroken after injection.

General Duration

- Swelling commonly peaks within 24–48 hours and resolves within 3–5 days.
- Minor bruising typically fades within 7–10 days, varying by skin tone and product used.

Typical After-Care

- Cold compresses for the first 24 hours.
- Avoidance of heat exposure, heavy exercise, and alcohol for 24–48 hours.
- Gentle cleansing and use of hydrating balms.

III. Exhibit Reference (Observation Only)

Based on my professional experience observing over 500 clients in the 24–48 hours following cosmetic lip injections, the overall surface appearance in Exhibit C—specifically the smooth, uniform contour along the vermillion border and localized coloration—shares general visual characteristics commonly seen shortly after lip-enhancement procedures. This statement identifies surface similarities only and does not offer any medical or causation opinion.

Final Statement

The information above is offered solely for educational and cosmetic observation purposes to assist the Court in understanding general post-procedure characteristics and cosmetic surface analysis. It is not a medical diagnosis or determination of cause, and it does not render an opinion regarding any specific individual or allegation.

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

Executed on October 11, 2025, at Sierra Madre, California.

X 

Melanie Khoury Sawaya

Makeup / Special Effects (SFX) Artist & Skincare Consultant