

Curriculum Vitae

Joseph Seitchik, M.D.

BORN :

October 22, 1915—Philadelphia, Pennsylvania

EDUCATION :

High School: West Philadelphia High School 1932

College: University of Pennsylvania, Philadelphia, Pennsylvania, B.A. 1936

University of Pennsylvania, Philadelphia, Pennsylvania, M.A. 1937

Medical School: University of Pennsylvania, Philadelphia, Pennsylvania, M.D. 1942

INTERNSHIP :

Mt. Sinai Hospital, Philadelphia, Pennsylvania 1942-43

RESIDENCY :

Obstetrics and Gynecology, Vanderbilt University Hospital, Nashville, Tennessee. 1943-45

PRIVATE PRACTICE :

Philadelphia, Pennsylvania 1946-47

APPOINTMENTS:

Instructor, Obstetrics and Gynecology, Vanderbilt University School of Medicine, Nashville, Tennessee.	1945-46
Instructor, Hahnemann Medical College, Philadelphia, Pennsylvania	1947-48
Assistant Professor, Hahnemann Medical College, Philadelphia, Pennsylvania.	1948-50
Associate Professor, Hahnemann Medical College, Philadelphia, Pennsylvania.	1950-54
Clinical Professor, Hahnemann Medical College, Philadelphia, Pennsylvania.	1954-61
Obstetrician and Gynecologist-in-Chief, Sinai Hospital of Baltimore, Inc., Baltimore, Maryland.	1961-68
Associate Professor, The Johns Hopkins University School of Medicine, Baltimore, Maryland.	1961-68
Professor and Chairman, Department of Obstetrics and Gynecology, The University of Texas Medical School at San Antonio.	1968-present

ORGANIZATIONS:

American Society for the Study of Sterility	
Diplomate, American Board of Obstetrics and Gynecology	1950
Sigma Xi	1951
Fellow, American College of Surgeons	1951
Fellow, Philadelphia College of Physicians	1952
Society for Gynecologic Investigation (President-elect 1970-71)	1956

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American College of Obstetricians and Gynecologists	1956
American Institute of Nutrition (Clinical Division)	1961-68
Member, Human Embryology and Development Study Section, National Institutes of Health	1964-68
American Association of Obstetricians and Gynecologists	1967
Member Obstetrics and Gynecology Residency Review Committee, Council on Education, American Medical Association	1968
Bexar County Medical Society	1969
American Gynecological Society	1969
Central Association of Obstetricians and Gynecologists	1971

Publications

1. Seitchik, J. Mechanism of the production of exophthalmos in exophthalmic goiter. Arch Ophth 27:762, 1942.
2. Burch, L. E. and Seitchik, J. Ectopic gestation. Amer J Obstet Gynec 50:765, 1945.
3. Seitchik, J. "Appendix of useful drugs" Menstrual Disorders and Sterility. 2nd Ed. Paul C. Hoeber, Inc., New York, 1946.
4. Seitchik, J. and Agerty, H. A. Experimental use of methyl testosterone in premature infants. Pediatrics 5:200, 1950.
5. Seitchik, J. The urinary excretion of pregnanediol in pregnant women receiving diethylstilbestrol. Amer J Obstet Gynec 60:877, 1950.

6. Agerty, H. and Seitchik, J. Experimental use of methyl testosterone and testosterone in premature infants. *Pediatrics* 10:28, 1952.
7. Seitchik, J. Observations on the renal tubular resorption of uric acid. *Amer J Obstet Gynec* 65:981, 1954.
8. Seitchik, J. and Alper, C. The body compartments of normal pregnant, edematous pregnant and pre-eclamptic women. *Amer J Obstet Gynec* 68:1540, 1954.
9. Seitchik, J. and Alper, C. The relationship of body composition to changes in weight during pregnancy. *Surg Clin N Amer* 34:1535, 1954.
10. Seitchik, J. and Alper, C. The effect of dietary protein intake on the metabolism of N¹⁵ labelled glycine in pregnant women. *Surg Forum* 6:451, 1956.
11. Seitchik, J. and Alper C. The estimation of changes in body composition in normal pregnancy by measurement of body water. *Amer J Obstet Gynec* 71:1165, 1956.
12. Seitchik, J. The metabolism of urate in pre-eclampsia. *Amer J Obstet Gynec* 72:40, 1956.
13. Seitchik, J. Changes in body composition and displacement volume in pregnancy. Report of the First Ross Obstetric Conference. 14-16, 1956.
14. Alper, C. and Seitchik, J. Comparison of the Archibald-Kern and Stransky colorimetric procedure and the praetorius enzymatic procedure for the determination of uric acid. *Clin Chem* 3:95, 1957.
15. Seitchik, J., Szutka, A., and Alper, C. Further studies on the metabolism of N¹⁵ labelled uric acid in normal

and in toxemic women. *Amer J Obstet Gynec* 76:1151, 1958.

16. Seitchik, J. Fluid and electrolyte metabolism in toxemia of pregnancy. *Clin Obstet Gynec* 1:309, 1958.
17. Seitchik, J. "Fluid and electrolyte metabolism in pregnancy" Edema, W. B. Saunders Company, Philadelphia, 1960.
18. Seitchik, J. Endometriosis and hormone therapy. *Amer J Obstet Gynec* 81:183, 1961.
19. Seitchik, J. Postoperative water, electrolyte, and transfusion therapy. *Clin Obstet Gynec* 5:567, 1962.
20. Seitchik, J., Alper, C., and Szutka, A. Changes in body composition during pregnancy. *Ann N.Y. Acad Sci* 110:821, 1963.
21. Seitchick, J. Water and electrolyte metabolism in normal pregnancy. *Obstet Gynec* 7:185, 1964.
22. Seitchik, J. and Cushner, I. M. "Bleeding complications of pregnancy" *Gynecology Obstetrics Guide*, Vol 1. Commerce Clearing House, Inc., Chicago, 1964.
23. Seitchik, J. and Cushner, I. M. "Obstetrical Hemorrhage" *Surgical Bleeding*. Blakiston Div McGraw-Hill, New York, 1966.
24. Yousem, H., Seitchik, J., and Solomon, D. Maternal estriol excretion and fetal dysmaturity. *Obstet Gynec* 28:491, 1966.
25. Seitchik, J. Total body water and total body density of pregnant women. *Obstet Gynec* 29:155, 1967.

26. Seitchik, J. Body composition and energy expenditure during rest and work in pregnancy. *Amer J Obstet Gynec* 97:701, 1967.
27. Seitchik, J., Goldberg, E., Goldsmith, J., and Pauerstein, C. J. Pharmacodynamic studies of the human fallopian tube in vitro. *Amer J Obstet Gynec* 102:727, 1968.

APPENDIX D

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Affidavit of William J. McGanity, M.D.

IN THE
SUPREME COURT OF THE UNITED STATES

No. 70-18, 1971 TERM

JANE ROE, JOHN DOE, MARY DOE, and
JAMES HUBERT HALLFORD, M.D.,

Appellants,

—V.—

HENRY WADE, DISTRICT ATTORNEY
OF DALLAS COUNTY, TEXAS,

Appellee.

ON APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

STATE OF TEXAS
COUNTY OF GALVESTON

BEFORE ME, the undersigned authority, on this day personally appeared WILLIAM J. MCGANITY, M.D., to me well known, who, after being first duly sworn, did depose and say as follows:

My name is William J. McGanity. The copies of my "Curriculum Vitae" and "Bibliography" attached hereto accurately reflect my medical background and the articles I have had published.

As the attached "Curriculum Vitae" indicates, I am Professor and Chairman, Department of Obstetrics and Gynecology, The University of Texas Medical Branch, Galveston, Texas 77550. As Chairman of the Department of Obstetrics and Gynecology, I am also Chief of the Obstetrics and Gynecology Service at The University of Texas Medical Branch hospitals. At least thirty percent of my time is devoted to the medical care and treatment of obstetrics and gynecology patients.

The seven hospitals that comprise the Medical Branch Hospitals are supported in large part by the State of Texas. They are charged with the care and treatment of both private and medically indigent patients who are referred to The University of Texas Medical Branch physicians by their local physicians or health related governmental agencies. The larger metropolitan areas in Texas have their own hospital districts which serve the medically indigent residing within the districts. The Medical Branch Hospitals serve as referral hospitals for such hospital districts, as well as the several million Texans who do not reside in a hospital district. Upon referral, the staff of the Medical Branch Hospitals are directly responsible for the medical care of those persons, be they private or medically indigent patients. The John Sealy Hospital is the largest general hospital unit on our campus.

Approximately 27,000 out-patient examinations are performed by physicians on the obstetrics and gynecology service each year; of this number, 12,000 visits are for family planning services. About 3,500 obstetrics and gynecology patients are admitted to The University of Texas Medical Branch Hospitals annually.

Physicians on the obstetrics and gynecology service have frequently been requested by patients in early pregnancy

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to perform abortions. It is likely that even more requests would be received were it not for the fact that many of the medically indigent patients served by our hospital live a considerable distance from Galveston and often enter prenatal care only late in their pregnancy, beyond the abortion period of gestation.

Before a therapeutic abortion may be performed in our hospital, the procedure must be recommended by the patient's physician plus a consulting physician, and approved by a three-member therapeutic abortion board of the hospital. On this board there must be at least three disinterested physicians (i.e. persons other than the recommending and consulting physicians). The board always includes an obstetrics and gynecology specialist, usually a psychiatrist, with a doctor from the medical discipline which specializes in the treatment of the patient's medical problem which served as the basis for the recommendation. If the board approves performance of the interruption procedure, such approval is recorded in the minutes of the meeting and the chairman (a person of senior faculty level) completes and signs a formal consult form, which contains a summary of the findings of the board. The statements of the recommending and the consulting physicians are placed on the patient's chart along with the signed summary form with the therapeutic abortion board's recommendation.

In addition to the standard operative permit which the patient must sign, a therapeutic abortion permit must be signed by the persons whose consent is required for the procedure. If she is married, the consent of the patient's husband must also be obtained. If she is a minor, consent of the patient's parent or guardian is also required. Only the consent of the pregnant woman is required if she is over 21 years-of-age and single.

The situation regarding when, under what lifesaving maternal circumstances, and after what administrative procedures an abortion may be performed in John Sealy Hospital is exactly what it was prior to the June 17, 1970 decision of the three-judge court in *Roe v. Wade*. The decision has had no impact on medical practice in the Medical Branch Hospitals. Abortions are performed only when the procedure is deemed to be indicated "for the purpose of saving the life of the mother," although that standard is often difficult to define and to apply.

Physicians on our hospital staff continue to disagree regarding the circumstances under which a requested abortion is within the statutory exception. Disagreements are most pronounced regarding psychiatric indications; some physicians feel that there are bona fide psychiatric disorders that jeopardize a woman's life, while other physicians feel that there are no psychiatric indications which would justify an abortion under current Texas law. There is more agreement regarding straightforward medical indications, such as a general agreement that pregnancy associated with severe heart or renal disease or malignancy would constitute a threat to the woman's life.

Texas doctors, including the members of my staff, are reluctant to perform medical abortions except when unquestionably indicated because of the ambiguity of the meaning and status of the Texas abortion law. That ambiguity and the resulting possibility and fear of prosecution is an effective restraint, for physicians are understandably anxious to avoid any possible involvement in criminal litigation. Several factors contribute to the fear of prosecution: the Court's refusal to issue an injunction against enforcement of the Texas law; the fact that the local district attorney has not indicated any change in

applicability of the law; statements of other district attorneys that the law is still in effect; reports of indictments being returned against Texas doctors in other cities for allegedly performing illegal abortions; and a great reluctance to engage in procedures or conduct which *may* lead to even the threat of criminal prosecution.

It is my opinion that the policy of the Medical Branch Hospitals, including that of John Sealy Hospital, regarding abortion prior to the twentieth week of pregnancy will be significantly altered if the Texas law becomes null and void. It can be anticipated that local hospitals or appropriate health care facilities will not be available for performing abortions in many Texas counties. Medically indigent patients who are in need of medical abortions from such localities and/or counties will be referred for care to the Medical Branch Hospitals. The Department of Obstetrics and Gynecology will have to consider the ways and means of providing care for the large number of patients one can anticipate will be seeking abortions should the law be changed.

/s/ WILLIAM J. MCGANITY, M.D.

STATE OF TEXAS
COUNTY OF GALVESTON

SWORN TO AND SUBSCRIBED TO before me on this the thirteenth day of August, 1971.

/s/ NANCY BYRD
Notary Public in and for
Galveston County, Texas

Curriculum Vitae

WILLIAM JAMES MCGANITY, M.D.

Business Address:

Department of Obstetrics and Gynecology, University of
Texas Medical Branch, Galveston, Texas

Home Address:

1402 Harbor View Drive, Galveston, Texas

Born:

Kitchener, Ontario, Canada—September 21, 1923

Citizenship:

American—Naturalized December 18, 1957

Wife:

Mary Kathryn Hambrock McGanity
Married on December 11, 1948

Children:

Peter Louis James McGanity	(December 1, 1949)
Martha Lee Jane McGanity	(November 5, 1951)
Brian David McGanity	(December 17, 1954)

Education:

1941	High School, Grade 13, Kitchener Waterloo Collegiate Institute, Kitchener, Ontario, Canada
1946 (Feb.)	M.D. Degree, University of Toronto Medical School, Toronto, Ontario, Canada

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|---------|--|
| 1946-47 | Internship, Toronto General Hospital, Toronto, Canada |
| 1949-52 | Residence in Obstetrics and Gynecology, University of Toronto and Toronto General Hospital, under Doctors H. B. Van Wyck and D. E. Cannell |

Honors and Fellowships:

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| 1946 | Hendry Prize in Obstetrics and Gynecology, University of Toronto |
| 1947-48 | Research Fellow in Nutrition, Department of Public Health Nutrition under Dr. E. W. McHenry, University of Toronto |
| 1948-49 | Research Fellow in Nutrition, Division of Nutrition under Dr. W. J. Darby, Vanderbilt University, Nashville, Tennessee |
| 1953 | F.R.C.S. (Canada) Royal College of Surgeons of Canada, Ottawa, Ontario, Canada |
| 1954-56 | Lowell M. Palmer Senior for Medical Sciences |

Military:

Royal Canadian Army Medical Corps,
1944-46-52

Appointments—Faculty:

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| 1949-52 | Part-time lecturer in Nutrition, Department of Public Health Nutrition, University of Toronto |
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1952-53	Instructor in Obstetrics and Gynecology, Vanderbilt University School of Medicine
1953-56	Assistant Professor of Obstetrics and Gynecology, Vanderbilt University School of Medicine
1956-59	Associate Professor of Obstetrics and Gynecology, Vanderbilt School of Medicine
1960-Present	Professor and Chairman, Department of Obstetrics and Gynecology, University of Texas Medical Branch
1964-67	Dean of Medicine, University of Texas Medical Branch

Appointments—Consultant:

1956-Present	Consultant for the Nutrition Program, Office of International Research, National Institutes of Health: formerly ICNND
1959-63	Food and Nutrition Board of National Research Council-Committees on Dietary Allowances and International Nutrition
1966-70	Committee on Maternal Nutrition
1960-Present	Consultant of Department of Air Force
1960-67	Consultant of Department of Army
1960-63	Consultant to Food and Drug Administration, Committee to Consider Folic Acid
1961-67	T.M.A.—Committee on Maternal Mortality (Chairman) and Scientific Activities
1963-66	Member of Council on Foods and Nutrition—AMA
1963-67	Nutrition Study Section—USPHS—NIH
1964-66	Children's Bureau (HEW)—Research Panel—Maternal and Child Health

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1964-66	Governor's Committee (Texas) on Mental Retardation
1967	Committee on Maternal Nutrition—NRC —Food and Nutrition Board

Licensed to Practice Medicine:

1946	Province of Ontario, Canada
1958	State of Mississippi
1959	State of Tennessee
1960	State of Texas

Professional Organizations and Societies:

American Association of Obstetricians
and Gynecologists
American College of Obstetricians and
Gynecologists
American Institute of Nutrition
American Medical Association
American Society for Clinical Nutrition
(President Elect)
Association of Professors of Gynecology
and Obstetrics
Central Association of Obstetricians and
Gynecologists
Galveston County Medical Society
Royal College of Physicians and Surgeons
of Canada
Sigma Xi Society
Society for Gynecologic Investigation
Southern Society for Clinical Research
Southwest Cancer Chemotherapy Group

Texas Association of Obstetricians and
Gynecologists
Texas Medical Association

Publications:

Approximately 80 in the field of reproductive physiology and pathology and nutrition

Publications

WILLIAM JAMES MCGANITY, M.D.

Books

1. *McGanity, William J.*, et al., Manual on Nutrition Surveys, 1st Edition, Chapter 5 and 9, 1957
2. *McGanity, William J.*, et al., Manual on Nutrition Surveys, 2nd Edition, Chapter 5 and 9, 1963

Papers

1. *McGanity, W. J.*, E. W. McHenry, H. B. Van Wyck, and G. L. Watt, "An Effect of Pyridoxine on Blood Urea in Human Subjects", J. Biol. Chem., 178:511, 1949
2. McHenry, E. W. and *W. J. McGanity*, "The Levels of Several Metabolites in Blood and Urine During Normal Pregnancy", Am. J. Obstet. & Gynec., 62:156, 1951
3. Beaton, J. R., *W. J. McGanity*, and E. W. McHenry, "Plasma Clutamic Acid Levels in Malignancy", J. Canad. Med. Assoc., 65:219, 1951

4. Cannell, D. E. and *W. J. McGanity*, "Treatment of Premature Separation of Placenta", *Arch. Medico de Cuba*, 3:534, 1952
5. *McGanity, W. J.* and J. C. Burch, "Estrogen Preparations", *J. Biol. Data*, 1953
6. *McGanity, W. J.*, "Review of Obstetrics and Gynecology", *Medicine of the Year*, 1953, *Am. Pract.*, March 1953
7. *McGanity, W. J.* and J. C. Burch, "Pain in the Right Lower Quadrant of the Female Abdomen", *Bul. Chicago Med. Society*, 1953
8. Byrd, B. F. and *W. J. McGanity*, "Effect of Pregnancy on Clinical Course of Malignant Melanoma", *Sou. Med. J.*, 47:196, 1954
9. Woodruff, C. W., *W. J. McGanity*, A. Stockwell and W. J. Darby, "Ascorbic Acid, Pterylglutamates and Other Factors in Scorbatic Hydroxyphenyluria", *Proc. Nutrition Soc.*, 12:329, 1953
10. Darby, W. J., *W. J. McGanity*, et al., "The Vanderbilt Cooperative Study of Maternal and Infant Nutrition—IV", *J. Nutrition*, 51:565, 1953
11. *McGanity, W. J.*, et al., "The Vanderbilt Cooperative Study of Maternal and Infant Nutrition—V", *Am. J. Obstet. and Gynec.*, 67:501, 1954
12. *McGanity, W. J.*, et al., "The Vanderbilt Cooperative Study of Maternal and Infant Nutrition—VI", *Am. J. Obstet. and Gynec.*, 67:501, 1954
13. *McGanity, W. J.* and W. J. Darby, Some Considerations in Making Therapeutic Trials, *Methods for*

- Evaluation of Nutritional Adequacy and Status", Advisory Board on Quartermaster Research and Development Committee on Foods, pp. 82-88, 1954
14. Ferguson, M. E., *W. J. McGanity*, W. J. Darby, et al., "The Vanderbilt Cooperative Study of Maternal and Infant Nutrition—VII", *J. Nutrition*, 55:305, 1955
 15. *McGanity, W. J.*, et al., "The Vanderbilt Cooperative Study of Maternal and Infant Nutrition—VIII", *J. Am. Dietetic Assoc.*, 31:582, 1955
 16. Darby, W. J. and *W. J. McGanity*, et al., "The Vanderbilt Cooperative Study of Maternal and Infant Nutrition—IX", *Obstet. and Gynec.*, 5:528, 1955
 17. Darby, W. J., *W. J. McGanity*, et al., "A Study of the Dietary Background and Nutrition of the Navajo Indian", *J. Nutrition*, Vol. 60, suppl. 2, 1956
 18. Peerman, C. G. and *W. J. McGanity*, "Cortisone and Antibiotic Therapy in Resistant Pelvic Inflammatory Disease", *Sou. Med. J.*, 50:3, 1957
 19. Hartmann, R. C. and *W. J. McGanity*, "Fibrinogen Deficiency in Pregnancy", *Obstet. and Gynec.*, 9:4, 1957
 20. Martin, M. P., E. B. Bridgforth, *W. J. McGanity*, and W. J. Darby, "The Vanderbilt Cooperative Study of Maternal and Infant Nutrition—X", *J. Nutrition*, 62:2, 1957
 21. Williams, R. R., G. F. Combs, *W. J. McGanity*, and Z. I. Kertesz, "A Nutrition Survey of the Armed Forces of the Republic of Korea", *J. Nutrition Supp*:1 Vol. 63: 1959

22. Martin, M. P., E. B. Bridgforth, *W. J. McGanity*, and W. J. Darby, "The Vanderbilt Cooperative Study of Maternal and Infant Nutrition—XI", *J. Nutrition*, 1958
23. *McGanity, W. J.*, et al., "The Vanderbilt Cooperative Study of Maternal and Infant Nutrition—XII", *J. Am. Med. Assoc.*, 168:2138, 1959
24. *McGanity, W. J.*, "Vitamin B₁₂ Requirement in Adult Men", *Am. J. Med.* 25:726, 1959
25. *McGanity, W. J.*, "Development of Vitamin B₁₂ Deficiency in Man", *Am. J. Clin. Nutrition*, 6:513, 1959
26. *McGanity, W. J.*, "Nutrition and Its Relation to Public Health in the Middle East, Transactions of the Middle East Medical Assembly, presented May 8, 1959
27. *McGanity, W. J.* and R. O. Cannon, "Iron Deficiency in Gynecologic Patients", *Am. J. Clin. Nut.*, 7:633, 1959
28. Darby, W. J. and *W. J. McGanity*, "A Nutrition Survey of the Armed Forces of the Philippines", *Am. J. Clin. Nut.*, 7:657, 1959
29. *McGanity, W. J.*, "Nutrition in Pregnancy", *Modern Medicine*, 28:108, 1960
30. *McGanity, W. J.*, "Nutrition Survey in Lebanon", Transactions of the Middle East Medical Assembly, May 1962
31. Coal, G. B., Richey, L. E., *McGanity, W. J.*, "Localization of the Placenta with Aortography", *Am. J. Ob. Gyn.*, 83:1150, 1962
32. Schreiber, M. H., M. M. Nichols, and *W. J. McGanity*, "Epiphyseal Ossification Center Visualization", *J. Am. Med. Assoc.*, 184:504, 1963

33. Darby, W. J., *W. J. McGanity*, et al., "Bitot's Spots and Vitamin A Deficiency", Public Health Reports, 75:738, 1960
34. LeBlanc, A. L. and *W. J. McGanity*, "Bacteriuria in Pregnancy—Preliminary Report", Tex. State Med. J., 60:137, 1964
35. LeBlanc, A. L. and *W. J. McGanity*, "The Impact of Bacteriuria in Pregnancy—A Survey of 1300 Pregnant Patients", Tex. Rep. Biol. Med., 22:336, 1964
36. Wilson, C. S., A. E. Schaefer, W. J. Darby, E. B. Bridgforth, W. N. Pearson, G. F. Combs, E. C. Leatherwood, J. C. Greene, L. J. Teply, I. C. Plough, *W. J. McGanity*, D. B. Hand, Z. I. Kertesz, and C. W. Woodruff, "A Review of Methods Used in Nutrition Surveys Conducted by the Interdepartmental Committee on Nutrition for National Defense (ICNND)", Am. J. Clin. Nut., 15:29, 1964
37. *McGanity, W. J.*, "Sensible Care for Anemia in Pregnancy", Consultant, June 1963
38. Laubach, J. B., *McGanity, W. J.*, "Hysterectomy Post Conization of the Cervix", Am. J. of Ob. Gyn., 91:3, 1965
39. Schreiber, M. H., Henrick, C. K., *McGanity, W. J.*, and Nichols, M., "Relation of Maternal Cardiac Volume to Infant Maturity", University of Texas Medical Branch NIH Grant
40. Fujino, M., Dawson, E. B., *McGanity, W. J.*, "Vitamin C and Vanil-Mandelic Acid Economy During Surgical Stress", Fed. Proc., 24:2, 1965

41. Fujino, M., Dawson, E. B., Holeman, T. and *McGanity, W. J.*, "Interrelationships Between Estrogenic Activity, Serum Iron and Ascorbic Acid Levels During the Menstrual Cycle", *Am. J. of Clin. Nut.*, Vol. 18, 1966
42. *McGanity, W. J.*, Fujino, M. and Dawson, E. B., "Nutritional Aspects of Gynecic Stress," *Am. J. Ob. & Gyn.*, 97:6, 1967
43. Menon, M.P., Wainerde, R.E., Omar, E.M., Dawson, E.B. and *McGanity, W.J.*, "Activation Analysis for Trace Element and K/Na Ratio Measurements in Placenta, and Their Relation to Acute Toxemia of Pregnancy", *Am. J. of Nuclear Medicine*.
44. Dawson, E.B., Clark, R.R., and *McGanity, W.J.*, "Trace Metals and Vitamins in Adolescent Pregnancy", *Am. J. of OB-GYN*.
45. Dawson, E.B., Clark, R.R. and *McGanity, W.J.* "Determination of Urine Thiamine by Automated Fluorometry", *Am. J. of OB-GYN*.
46. Dawson, E.B., Clark, R.R., and *McGanity, W.J.*, "Determination of Urine Riboflavin by Automated Fluorometry", *Am. J. of OB-GYN*.
47. Dawson, E.B., Clark, R.R., and *McGanity, W.J.*, "Season Variation in Adenosine Triphosphate and Nicotinamide Adenosine Dinucleotide in Normal Term Placentae", *Am. J. of OB-GYN*.
48. Dawson, E.B., Clark, R.R., and *McGanity, W.J.*, "Plasma Vitamins and Trace Metal Changes During Teenage Pregnancy", *Am. J. of OB-GYN*.
49. Dawson, E.B., *McGanity, W.J.*, "A Study of Nine Cation Levels in Term Placentae: (2) Changes Asso-

ciated with Toxemia of Pregnancy and Fetal Prematurity", Am. J. of OB-GYN.

50. *McGanity, W.J.*, "Nutrition Survey in Texas", Texas Medicine.
51. Dawson, E.B., and *McGanity, W.J.*, "Plasma Amino Acid Alteration During Teenage Pregnancy", Am. J. of OB-GYN.
52. Dawson, E.B., Moore, T.D., and *McGanity, W.J.*, "The Mathematical Relation of Drinking Water Lithium and Rainfall to Mental Hospital Admission", Diseases of the Nervous System.

Abstracts

1. Dawson, E.B., Croft, H., *McGanity, W.J.*, McCoy, T.C. Seasonal Variation in Placental Trace Metals. VII International Congress of Nutrition, Hamburg, Germany, August 3-10, 1966
2. Menon, M.P., Wainerdi, R.E., Omar, E.M., Dawson, E.B., *McGanity, W.J.*, Activation Analysis in Trace Element and Na/K Ratio Measurements in Placenta and Their Relation to Acute Toxemia of Pregnancy. VII Japanese Conference on Radioisotopes, Tokyo, Japan, May 16-19, 1966
3. Dawson, E.B., and *McGanity, W.J.* Impact of Urinary Tract Infection on Nutritional Status. VI Annual Meeting of the American Society for Clinical Nutrition, Atlantic City, New Jersey, April 30, 1966. (Read by title).
4. Dawson, E.B., Croft, H., McCoy, T.C., *McGanity, W.J.* Seasonal Variation in Placental Macro-Metals. Annual Meeting of the American Institute of Nutrition, Atlantic City, New Jersey, April 11-16, 1966

APPENDIX E

IN THE NAME AND BY THE AUTHORITY OF

THE STATE OF TEXAS

THE GRAND JURORS OF THE STATE OF Texas, duly elected, tried, empaneled, sworn and charged to inquire of offenses committed in Tarrant County, in the State of Texas, upon their oaths do present in and to the Criminal District Court^{#1} of said County that one

BILL BROCK, JR.

hereinafter styled Defendant, in the County of Tarrant and State aforesaid, on or about the 11th day of April , in the year of our Lord One Thousand Nine Hundred Seventy-one~~88~~ in and upon Deborah Jean Smith, a woman, then and there pregnant, did then and there unlawfully, willfully, and designedly, with the consent of the said Deborah Jean Smith, thrust and force into the womb and private parts of the said Deborah Jean Smith a certain metallic instrument calculated to produce abortion, and did then and there procure an abortion of the said Deborah Jean Smith, and did then and there destroy the life of the fetus or embryo in the womb of the said Deborah Jean Smith,

contrary to the form of the Statutes in such cases made and provided and against the peace and dignity of the State.

Frank Coffey

Criminal District Attorney.

E. E. Beck
Foreman Grand Jury.

This cause is hereby transferred to the _____ District Court of Tarrant

this the _____ day of _____ A. D. 19_____.

_____, Judge

This cause is hereby transferred to the _____ District Court of Tarrant County, Texas

this the _____ day of _____ A. D. 19_____.

_____, Judge

This cause is hereby transferred to the _____ District Court of Tarrant County, Texas

this the _____ day of _____ A. D. 19_____.

_____, Judge

1500

Liber No. Direct

No. 84066

INDICTMENT

THE STATE OF TEXAS

vs.

BILL BROCK, JR.

OFFENSE

ABORTION

A True Bill.

Asst. E. E. Boyd
Foreman Grand Jury

FILED

CRIMINAL DISTRICT COURT No. 1
TARRANT COUNTY, TEXAS

JUN - 8 1971

J. W. BOORMAN
DISTRICT CLERK

By _____ County

cc: Judy Moore; Jimmy Defontes

TO THE CLERK OF THE DISTRICT COURTS OF TARRANT COUNTY, TEXAS:

In the case of the State of Texas vs. BILL BROCK, JR., Arlington, Texas
herein you will please issue subpoenas in accordance with the law for the following named witnesses:

	Name	Address	Avocation
1.	Sgt. Gale, Arlington PD		
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			

The testimony of said witnesses is believed to be material to the State.

Criminal District Attorney, Tarrant County, Texas

Sworn to and subscribed before me on this the _____ day of _____ A. D. 19_____

Clerk of the District Courts, Tarrant County, Texas

By _____ Deputy.

CERTIFIED TRUE COPY

THE STATE OF TEXAS }
COUNTY OF TARRANT }

J.W. Boorman
I, ~~George Johnson~~, Clerk of the District Courts of Tarrant County, Texas, do hereby certify that the
above and foregoing is a true and correct copy of INDICTMENT

In Cause No. 84066 The State of Texas vs. BILL BROCK, JR.

as the same appears of file and/or of record in my said office.

WITNESS MY SIGNATURE and seal of the Court at office in the City of Fort Worth, Tarrant
County, Texas, this the 22nd day of June A.D., 19 71

J. W. BOORMAN
~~GEORGE JOHNSON~~
Clerk, District Courts, Tarrant County, Texas

By *Cherri Evans*
Cherri Evans Deputy

IN THE NAME AND BY THE AUTHORITY OF

THE STATE OF TEXAS

THE GRAND JURORS OF THE STATE OF Texas, duly elected, tried, empaneled, sworn and charged to inquire of offenses committed in Tarrant County, in the State of Texas, upon their oaths do present in and to the Criminal District Court ^{#1} of said County that one

JUDY K. MOORE

hereinafter styled Defendant, in the County of Tarrant and State aforesaid, on or about the 11th day of April, in the year of our Lord One Thousand Nine Hundred Seventy-one did in and upon Deborah Jean Smith, a woman, then and there pregnant, did then and there unlawfully, willfully, and designedly, with the consent of the said Deborah Jean Smith, thrust and force into the womb and private parts of the said Deborah Jean Smith a certain metallic instrument calculated to produce abortion, and did then and there procure an abortion of the said Deborah Jean Smith, and did then and there destroy the life of the fetus or embryo in the womb of the said Deborah Jean Smith,

contrary to the form of the Statutes in such cases made and provided and against the peace and dignity of the State.

Francis C. Coffey
Criminal District Attorney.

E. E. B. B.
Foreman Grand Jury.

This cause is hereby transferred to the _____ District Court of Tarrant County, Texas
this the _____ day of _____ A. D. 19_____.

_____, Judge

This cause is hereby transferred to the _____ District Court of Tarrant County, Texas
this the _____ day of _____ A. D. 19_____.

_____, Judge

This cause is hereby transferred to the _____ District Court of Tarrant County, Texas
this the _____ day of _____ A. D. 19_____.

_____, Judge

2500

Liber No. Direct

No. 84081

INDICTMENT

THE STATE OF TEXAS

vs.

JUDY K. MOORE

OFFENSE

ABORTION

A True Bill.

E. E. Best
Assistant Foreman Grand Jury

FILED
CRIMINAL DISTRICT COURT No. 1
TARRANT COUNTY, TEXAS

JUN - 8 1971

J. W. BOORMAN
DISTRICT CLERK

cc: Brocky Defontes

TO THE CLERK OF THE DISTRICT COURTS OF TARRANT COUNTY, TEXAS:

In the case of the State of Texas vs. JUDY K. MOORE
herein you will please issue subpoenas in accordance with the law for the following named witnesses:

	Name	Address	Avocation
1.	Sgt. Gale, Arlington, Texas	PD	
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			

The testimony of said witnesses is believed to be material to the State.

Criminal District Attorney, Tarrant County, Texas

Sworn to and subscribed before me on this the _____ day of _____ A. D. 19_____

Clerk of the District Courts, Tarrant County, Texas

By _____ Deputy.

THE STATE OF TEXAS }
COUNTY OF TARRANT }

I, J. W. BOORMAN
~~George Johnson~~, Clerk of the District Courts of Tarrant County, Texas, do hereby certify that the
above and foregoing is a true and correct copy of INDICTMENT

In Cause No. 84081 The State of Texas vs. Judy K. Moore

as the same appears of file and/or of record in my said office.

WITNESS MY SIGNATURE and seal of the Court at office in the City of Fort Worth, Tarrant

County, Texas, this the 22nd day of June A.D., 19 71

J. W. BOORMAN
~~GEORGE JOHNSON~~
Clerk, District Courts, Tarrant County, Texas

By Cherri Evans
Cherri Evans Deputy

E-6

IN THE NAME AND BY THE AUTHORITY OF

THE STATE OF TEXAS

THE GRAND JURORS OF THE STATE OF Texas, duly elected, tried, empaneled, sworn and charged to inquire of offenses committed in Tarrant County, in the State of Texas, upon their oaths do present in and to the Criminal District Court^{#1} of said County that one

JIMMY DEFONTES

hereinafter styled Defendant, in the County of Tarrant and State aforesaid, on or about the 11th day of April, in the year of our Lord One Thousand Nine Hundred Seventy-one^{##} did in and upon Deborah Jean Smith, a woman, then and there pregnant, did then and there unlawfully, willfully, and designedly, with the consent of the said Deborah Jean Smith, thrust and force into the womb and private parts of the said Deborah Jean Smith a certain metallic instrument calculated to produce abortion, and did then and there procure an abortion of the said Deborah Jean Smith, and did then and there destroy the life of the fetus or embryo in the womb of the said Deborah Jean Smith,

contrary to the form of the Statutes in such cases made and provided and against the peace and dignity of the State.

Frank B. Laffey
Criminal District Attorney.

Arif E. E. Bond
Foreman Grand Jury.

This cause is hereby transferred to the _____ District Court of Tarrant
this the _____ day of _____ A. D. 19_____, Judge
This cause is hereby transferred to the _____ District Court of Tarrant County, Texas
this the _____ day of _____ A. D. 19_____, Judge
This cause is hereby transferred to the _____ District Court of Tarrant County, Texas
this the _____ day of _____ A. D. 19_____, Judge

2500

Liber No. Direct

No. 84071

INDICTMENT

THE STATE OF TEXAS

vs.

JIMMY DEFONTES

OFFENSE

ABORTION

A True Bill.

G. E. Best
Foreman Grand Jury

FILED

CRIMINAL DISTRICT COURT No. 1
TARRANT COUNTY, TEXAS

JUN - 8 1971

J. W. BOORMAN
DISTRICT CLERK

Deputy

cc: Brock; Moore

TO THE CLERK OF THE DISTRICT COURTS OF TARRANT COUNTY, TEXAS:

In the case of the State of Texas vs. JIMMY DEFONTES, 11526 Midsurrey Rd.
herein you will please issue subpoenas in accordance with the law for the following named witnesses: ^{Dallas}

	Name	Address	Avocation
1.	Sgt. Gale, Arlington PD		
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			

The testimony of said witnesses is believed to be material to the State.

Frank Coffey
Criminal District Attorney, Tarrant County, Texas

Sworn to and subscribed before me on this the _____ day of _____ A. D. 19____

Clerk of the District Courts, Tarrant County, Texas

By _____ Deputy.

CERTIFIED TRUE COPY

THE STATE OF TEXAS }
COUNTY OF TARRANT }

J. W. Boorman
I, ~~George Johnson~~, Clerk of the District Courts of Tarrant County, Texas, do hereby certify that the
above and foregoing is a true and correct copy of INDICTMENT

In Cause No. 84071 The State of Texas vs. Jimmy Defontes

as the same appears of file and/or of record in my said office.

WITNESS MY SIGNATURE and seal of the Court at office in the City of Fort Worth, Tarrant
County, Texas, this the 22nd day of June A.D., 19 71

J. W. BOORMAN
~~GEORGE JOHNSON~~
Clerk, District Courts, Tarrant County, Texas

By *Cherri Evans*
Cherri Evans Deputy

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