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**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

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## 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.

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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 N<sup>15</sup> 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 N<sup>15</sup> labelled uric acid in normal

## C-14

- 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.

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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**

D-1

**Affidavit of William J. McGanity, M.D.**

IN THE  
SUPREME COURT OF THE UNITED STATES  
No. 70-18, 1971 TERM

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

*Appellants,*

—v.—

HENRY WADE, DISTRICT ATTORNEY  
OF DALLAS COUNTY, TEXAS,

*Appellee.*

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

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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.



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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.

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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

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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

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### 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:

- 1946 Hendry Prize in Obstetrics and Gynecol-  
ogy, University of Toronto
- 1947-48 Research Fellow in Nutrition, Depart-  
ment 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, Vander-  
bilt 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:

- 1949-52 Part-time lecturer in Nutrition, Depart-  
ment of Public Health Nutrition, Uni-  
versity 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

## D-9

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



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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

## D-11

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 Scorbutic 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*

## D-12

- 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

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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 B<sub>12</sub> Requirement in Adult Men", *Am. J. Med.* 25:726, 1959
25. *McGanity, W. J.*, "Development of Vitamin B<sub>12</sub> 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

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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-Mandelie Acid Economy During Surgical Stress", Fed. Proc., 24:2, 1965

## D-15

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-

## D-16

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<sup>#1</sup> of said County that one .....

BILL BROCK, JR.

hereinafter styled Defendant, in the County of Tarrant and State aforesaid, on or about the 11<sup>th</sup> day of April , in the year of our Lord One Thousand Nine Hundred Seventy-one~~44~~ 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 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 \_\_\_\_\_

6500

Liber No. Direct

No. 84066

INDICTMENT

THE STATE OF TEXAS

vs.

BILL BROCK, JR.

OFFENSE

ABORTION

A True Bill.

*Asst. E. E. Bond*  
Foreman Grand Jury

FILED

CRIMINAL DISTRICT COURT No. 1  
TARRANT COUNTY, TEXAS

JUN - 8 1971

J. W. BOOZEMAN  
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 <sup>#1</sup> of said County that one -----

JUDY K. MOORE

hereinafter styled Defendant, in the County of Tarrant and State aforesaid, on or about the 11<sup>th</sup> 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 C. Collier*

Criminal District Attorney.

*E.E. 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

7500

Liber No. Direct

No. 84081

INDICTMENT

THE STATE OF TEXAS

vs.

JUDY K. MOORE

OFFENSE

ABORTION

A True Bill.

*E. E. Beck*  
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.

CERTIFIED TRUE COPY

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

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<sup>#1</sup> of said County that one

JIMMY DEFONTES

hereinafter styled Defendant, in the County of Tarrant and State aforesaid, on or about the 11<sup>th</sup> day of April, in the year of our Lord One Thousand Nine Hundred Seventy-one<sup>##</sup> 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. Boud*  
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. 84071

# INDICTMENT

THE STATE OF TEXAS

vs.

JIMMY DEFONTES

OFFENSE

ABORTION

A True Bill.

*G. E. Brock*  
Foreman Grand Jury

FILED

CRIMINAL DISTRICT COURT No. 1  
TARRANT COUNTY, TEXAS

JUN - 8 1971

J. W. BOORMAN  
DISTRICT CLERK

By *[Signature]* 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 wit-  
nesses: 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