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Attorneys for Plaintiffs
ALEX ROSAS and JONATHAN
GOODWIN, on behalf of themselves
and of those similarly situated

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ALEX ROSAS and JONATHAN
GOODWIN on behalf of themselves
and of those similarly situated,

Plaintiffs,

vs.

Robert Luna, Sheriff of Los Angeles
County, in his official capacity,

Defendant.

CASE NO. CV 12-00428 DDP (MRW)

**REDACTED DECLARATION OF
RAYMOND DUNN, M.D.**

Assigned to Hon. Dean D. Pregerson

Hearing: June 26, 2023 10:00 am

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Redacted Declaration of Raymond Dunn, M.D.

I, Raymond Dunn, M.D., hereby declare:

1. I make this declaration based on my own personal knowledge and if called to testify I could and would do so competently as follows:

QUALIFICATIONS

2. In summary, I am currently Professor of Surgery in the Department of Surgery Division of Plastic Surgery at the University of Massachusetts Medical Center. I have been in full time employment as a plastic surgeon here at UMass since July 1990. I trained in general surgery and plastic surgery and am board-certified in both disciplines. For background UMass Medical Center is an ACS level 1 trauma center. Throughout my career I have been involved with and continue to be involved with the clinical care of facial injuries and facial fractures of all severity and all etiology including many as a result of motor vehicle trauma and many fractures and facial injuries associated with altercations of various levels of severity including those involving inmates in our local correctional facilities. The extent and breadth of this clinical exposure allows me accurately and honestly review and opine on the cases under discussion. My CV is attached as Exhibit A.

COMPENSATION

Plaintiffs' counsel are paying me \$600 per hour to prepare this declaration.

MATERIALS PROVIDED

2. Plaintiffs' counsel have provided me with the following materials:
- Use of Force Reports and Videos
- [REDACTED – use of force case number]
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- 9 • UOF Package Summaries – May 2023

10 3. They have also provided me with materials about the make-up of the
11 LA County jail population, including the percentage who have serious mental
12 illness, and materials about the prevalence of post-traumatic stress disorder in
13 incarcerated populations and the incidence of medical disease including
14 hypertension and obesity in incarcerated populations. A list of these materials is
15 attached as Exhibit B.

16 3. I have reviewed all 9 videos depicting use of force incidents involving
17 head strikes and transcripts associated with incarcerated patient's injuries and
18 related discussions [Redacted use of force case numbers]

19
20 I have also reviewed all the other materials that Plaintiffs' counsel provided me.

21 **SCOPE OF WORK AND SUMMARY OF OPINIONS**

22 4. My comments we will focus specifically on facial injuries specifically
23 and typically orbital, nasal, zygomatic (cheekbone), mandible (jawbone), and soft
24 tissue injuries associated with blows to the face or head occurring during
25 altercations. The vast majority of these altercations do involve fist/hand strikes
26 and almost universally also result in hand injuries to guards or those who “strike”
27 (which can also be inmates). These injuries may be fractures or ligamentous
28 injuries and these may result in permanent injury depending on their severity. I

1 will refrain from elucidating comments regarding intracranial injuries except as
2 they specifically relate to the facial and soft tissue fractures I have mentioned
3 above.

4 5. "Head" strikes are almost universally associated with facial bone and
5 soft tissue injury. These head strikes can be minimal or severe depending on the
6 pattern of associated facial injury and the location of the strikes such as the temple
7 area being associated with cheekbone fractures and frontal cranial injuries being
8 associated with nasal and orbital fractures. These can also range in severity and if
9 there is corresponding intra-cerebral injury protracted healing with potential
10 permanent brain injury can occur.

11 6. As a clarification it should be noted that the types of injuries that we
12 are discussing would almost universally be described as blunt force injuries. It is
13 important to note that in blunt force injury the actual extent of injury may extend
14 beyond a simple fracture to a bone and is likely to involve soft tissue overlying
15 this. The consequence of this may be beyond simple cuts and scrapes but involve
16 also the risk of underlying sensory or even motor nerve injury in the facial areas.
17 Specifically, injuries to the central face risk injuries to the second branch of the
18 trigeminal nerve providing sensation to the midface upper lip upper dental areas
19 and lower jaw. Blunt injury to the side of the face may result in injury to the facial
20 nerve which may have a consequence regarding movement of various muscles in
21 the face the consequences of which may be facial drooping slurring of speech or
22 both. Severe nasal fractures can result in loss of smell due to extended injury.

23 7. Facial fractures to the bony areas I have outlined above may also
24 result in consequent soft tissue injuries including injuries to the actual globe or eye.
25 This may result in a visual injury which is permanent.

26 8. Even with the surgical management of facial fractures there will
27 frequently be permanent scarring associated with the management of these injuries
28 as well as possible permanent deformities and facial asymmetries. The importance

1 of this relates to further and potentially permanent mental health consequences
2 such as depression, protracted PTSD, anxiety and aggressive behavioral responses
3 as a result of appearance and the rehabilitative limitations associated with facial
4 injury be it soft tissue or facial fracture.

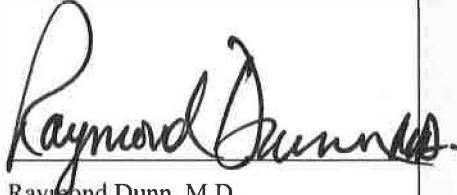
5 9. Mandible or jaw injuries are particularly problematic as there is a
6 reasonable likelihood of dental injury associated with these and long-term the
7 possibility of chronic infection to the dental areas with loss of teeth, loss of normal
8 occlusion (how a person chews). The impact of this in fact actually relates to risks
9 of multiple long term chronic medical issues including infections throughout the
10 body and particularly the heart -- in particular endocarditis --¹ having a severe
11 impact on longevity.

12 10. Based on the review of the videos, and the areas that were described
13 and able to be visualized there is a virtually certain likelihood of short and long-
14 term consequence of the facial injuries that were described in the reports or are
15 common with the kinds of blows to the face and head that I observed in these
16 videos.

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28 ¹ Inflammation and infection of the membrane that lines the inside of the chambers
of the heart and comprises the surface of the heart valves.

1 11. If you have any questions or require any further clarification or
2 elucidation of any of these descriptions please do not hesitate to contact me

3 I declare under penalty of perjury of the laws of the State of California and
4 the United States that the foregoing is true and correct. Executed this May 30,
5 2023 in Worcester, Massachusetts.

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9 Raymond Dunn, M.D.

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EXHIBIT A

Curriculum Vitae

RAYMOND MICHAEL DUNN, MD

PROFESSIONAL ADDRESS:

Division of Plastic Surgery
University of Massachusetts Medical Center
Worcester, Massachusetts 01655
Tel. 508-856-5299
Fax 508-856-5250
E-Mail: dunnr@ummhc.org

PERSONAL:

Birth Date: June 16, 1957
Citizenship: USA
Height: 6'2" Weight: 185 lbs
Health: Excellent
Spouse: Beth
Children: Katherine, Meaghan,
Sarah

EDUCATION:

1978-1982	Albany Medical College Albany, New York	M.D.
1974-1978	Worcester Polytechnic Institute Worcester, Massachusetts	B.S. Honors
1970-1974	Iona Preparatory School New Rochelle, New York	

GRADUATE MEDICAL TRAINING:

1987-1990	Resident in Plastic Surgery Eastern Virginia Medical School	Norfolk, VA
1982-1987	Resident in General Surgery University of Massachusetts Medical Center	Worcester, MA

ACADEMIC APPOINTMENTS:

2002-	Chief , Division of Plastic Surgery, University of Massachusetts Medical Center	
1998-	Interim Chief , Division of Plastic Surgery, University of Massachusetts Medical Center	
1998-	Associate Professor , Graduate School of Biomedical Sciences, University of Massachusetts Medical Center	
1995-	Associate Professor , Department of Surgery, Division of Plastic Surgery Associate Professor, Department of Anatomy and Cell Biology, University of Massachusetts Medical Center	
1995-	Adjunct Associate Professor , Department of Biomedical Engineering Worcester Polytechnic Institute, Worcester, MA	
1993-	Assistant Professor , Department of Anatomy and Cell Biology University of Massachusetts Medical Center	
1992-	Adjunct Assistant Professor , Department of Biomedical Engineering Worcester Polytechnic Institute	
1990-	Assistant Professor , Department of Surgery, Division of Plastic Surgery University of Massachusetts Medical Center	

CERTIFICATION:

1983	National Board of Medical Examiners	#260874
1988	American Board of Surgery	#33824
1993	American Board of Plastic Surgery	#4432
1994	American Board of Plastic Surgery Certificate of Added Qualifications in Hand Surgery	#317

MEDICAL LICENSURE:

1986 Massachusetts

#55227

APPOINTMENTS:

1992-1998 Co-Director, Venous Clinic
University of Massachusetts Medical Center

POSTGRADUATE TRAINING:

2001 Project Management Fundamentals
1997 Residency Review Committee Site Visit Training
1996 ASPRS Board of Directors Development Training
1996 MacAdemy (MacIntosh Computer Training)
1995 Young Plastic Surgeons Leadership Course (invited participant)
1995 ASPRS Media Training

INTERNATIONAL SURGICAL EXPERIENCE:

1991 Federico Trilla Foundation, Puerto Rico
1990 Haife, Israel (Maimomides Fellow)
1989 Operation Smile, Philipines
1989 Interplast - Physicians for Peace, Turkey
1988 Operation Smile, Liberia

HONORS AND AWARDS:

2002 "America's Top Surgeons"
2002 Who's Who Among America's Teachers, 2002
2002 ASRM Godina Traveling Fellow Award
1998 "Best Doctors in America"
1994 **Research Award**, American Venous Forum - **1st Place**
1993 Ichabod Washburn Award - WPI
1990 Maimomides Fellowship Award, Norfolk, VA
1990 PSEF Senior Resident **Presentation Award - Best Paper**
1988 AMA Resident Leadership Award
1978 NSF Senior Seminar Associate
1977 Phi Lambda Upsilon Chemistry Honor Society
1977 Phi Gamma Delta Educational Award Winner
1976 Tau Beta Pi Engineering Honor Society (Junior Year Initiation)

MAJOR NATIONAL COMMITTEES:

2002- ASPS Scientific Program Committee
2002- NESPRS Secretary (Elected) and Membership Chairman
2001- ASPS Judicial Council (Elected) Member
2000- NESPRS Executive Council (Elected)
1999- ASPS Regulatory Evaluation Committee
1999- PSEF Committee on Accreditation and Re-Certification
1999- PSEF Research Funding Committee
1998-2000 PSEF Core Surgical Exam Committee
1998-2001 PSEF Domestic Clinical Symposia
1998- PSEF Archives Committee
1998-1999 NESPRS Nominating Committee
1998-2001 ASPRS Ethics Committee (elected member)
1998- ASPRS - CME Committee **Chairman**
1997-2000 ASPRS/PSEF Committee on Joint Sponsorship
1996-1998 ASRM Clinical Guidelines and Outcomes Committee
1997-1998 ASRM Clinical Guidelines and Outcomes Committee **Chairman**

1996-2002 PSRC Scientific Program Committee
1996-2000 ASPRS Scientific Program Committee
1996-1998 ASPRS Public Education and PSEC Advisory Committee
1996-1998 PSEF Instructional Course Committee
1993-1996 ASPRS-YPS **Chairman**
1993-1996 ASPRS **Board of Directors**
1988-1993 ASPRS-YPS Committee
1996-1999 PSEF AAMC Representative
1996-1999 PSRC AAMC Representative
1993-1996 PSEF Board of Directors -Auditor
1993-1995 PSEF Research Funding Proposals Committee
1990-1994 ASPRS AMA-YPS Alternate Delegate
1989-1990 ASPRS AMA-RPS Alternate Delegate
1989 Virginia AMA-RPS Resident Delegate

LOCAL AND HOSPITAL COMMITTEES:

1999- Hahnemann Hospital Executive Committee
1999- UMMHC Physician Benefits Committee
1999-2001 Hahnemann Ambulatory Surgery Development Task Force
1998-2000 Wrong Site Surgery Committee
1998-2000 Ad Hoc Committee - Operative Services
1998- Management of Osteomyelitis S.I.T. - **Co-Chair**
1997- Worcester Polytechnic Institute Alumni Advisory Council
1997- Worcester Polytechnic Institute Class Board of Directors-**Chairman**
1996-1998 OR-MIS Steering Committee
1995-1997 OR Patient Flow Committee **Co-Chair**
1994-1997 UMass Payor Relations Committee
1993-2001 UMass OR Committee
1993-1995
& 2002 Dept. of Surgery Committee on Faculty Productivity and Compensation
1993- Worcester Polytechnic Institute Reunion Committee-**Chairman**
1993- UMass Plastic Surgery Chairman Search Committee
1993-1994 UMass Managed Care Task Force Committee
1992-1995 UMass Animal Review Committee
1992 Plastic Surgery, Ph.D. Search Committee - **Chairman**
1991- Worcester Polytechnic Institute Pre-Health Advisory Committee

PROFESSIONAL ASSOCIATIONS:

2000- Association of Academic Chairman of Plastic Surgery
1996- American Society of Reconstructive Microsurgeons
1995- Plastic Surgery Research Council
1994- New England Society of Plastic and Reconstructive Surgeons
1993- American Society of Plastic and Reconstructive Surgeons
1992- American Association of Clinical Anatomy
1992- Massachusetts Society of Plastic and Reconstructive Surgeons
1989(1995) American College of Surgeons (Fellow) (Massachusetts Chapter)
1988 American Medical Association

RESEARCH GRANTS (FUNDED: CHRONOLOGIC):

1. Microvascular Free Flap Monitoring: Evaluation and Comparison of Tissue PCO₂ and pH Measurement for Early Detection of Flap Failure. **EVMS I88-21: \$4,000. (1988) Principal Investigator.**
2. The Rat Rectus Abdominus Myocutaneous Flap Model: A True Myocutaneous Flap Model. **EVMS I89: \$4,832.75. (1989) Principal Investigator.**
3. PH Monitoring in Experimental Compartment Syndrome: **ASSH 1991-1: \$4,915.00. (1991) Principal Investigator.**
4. Evaluation of Calcium Alginate on In-Vitro Wound Healing. **Dow B. Hickham I93-001 \$37,500, (1992) Sugarland, TX. Co-Principal Investigator.**
5. Evaluation of the Expression of Growth Factors and Their Receptors in Human Chronic Wounds. **Institute of Molecular Biology (Worcester, MA) HSC #2457:\$6,000.00. (1994) Principal Investigator.**
6. A Randomized Trial of Two Compressive Dressings for the Management of Venous Stasis Ulceration. **Smith & Nephew United: HSC #2745 \$185,000. (1994) Principal Investigator.**
7. Development of Tissue pH Microsurgical Flap Monitor. **Translational Research Program (1995) (UMMC) \$20,000. Principal Investigator.**
8. Correlation Between pH and Quantitative Bacteriology. **PSEF (1999) \$5000. Co-Principal Investigator.**
9. Engineering of Autologous Skin: A Bilayer Approach to Use of Hydrogel. **PSEF (2000) \$5000. Co-Principal Investigator.**
10. Development of a Multi-Disciplinary Hospital Based Wound Center. **Fuller Foundation. (2002) \$85,000 Principal Investigator**

GRANTS (UNFUNDED):

1. 1994: The Role of Cytokines in Chronic Venous Ulcers. **American Heart Association (3 years) \$119,920. Co-Principal Investigator.**
2. 1995: Prognostic Value of cICAM-1 Blood Levels for CVI Ulceration. **Plastic Surgery Educational Foundation. \$5,000. Co-Principal Investigator.**
3. 1996: Minimally Invasive Microvascular Ischemia Monitor. **NIH-STTR Phase 1 (1 year) \$99,010. Principal Investigator.**
4. 1996: The Significance of IL-10 Expression in CVI ulcers to the Wound Healing Process. **Johnson & Johnson. \$61,141. Co-Principal Investigator.**
5. 1999: Training in Mechanisms of Trauma Pathophysiology. **PHS \$1,079,370. Surgical Mentor.**
6. 1999: Tissue Engineering of Skin. **Worcester Foundation for Biomedical Research. \$30,874. Co-Principal Investigator.**

7. 2001: Fasciocutaneous Epigastric Free Flap of a Smoke Exposed Rate with Sumvastatin. **PSEF (2001) \$5000. Co-Investigator.**

COLLABORATIVE GRANTS:

- 1997: Non-Contact Impedance Spectroscopy Ischemia Measurements.
NIH. \$222,410 (unfunded). (with WPI Biomedical Engineering)
- 1998: Joint Proposal to Establish a Center for Biomedical Engineering.
Whitaker Foundation, 2,989,350 (pending) (with WPI Biomedical Engineering).

PATENTS:

1. **Tissue Spreading Forceps**
Patent #5,449,374. Issued September 12, 1995
2. **Method and Device for Eliminating pH Electrode Drift**
Patent #5766432. Issued June 16, 1998

PATENTS PENDING:

1. **Malleolar Donut, 2002**

PUBLICATIONS:

1. Pavlik, J.W., **Dunn, R.M.** Photoisomerization of 2, 6-di-t-butyl 4-OH Pyrilium Cations. Evidence of a Dewar Type Intermediate. Tetrahedron Letters, 51, 1071-74, 1978.
2. **Dunn, R.M.**, Mancoll, J., I. Experimental Comparison of Direct and Tonometrically Measured Tissue pH Monitoring. II. Clinical Use of Tissue pH in Free Flaps. Plastic Surgery Educational Foundation Essay, 1990.
3. **Dunn, R.M.**, Mancoll, J. Flaps in the Experimental Rat: A Review. Plast. Reconst. Surg. 90:319-328, 1991.
4. **Dunn, R.M.**, Mancoll, J. The Rat Tram Flap: A True Myocutaneous Flap Model. Ann. Plast. Surg. 31:352-357, 1993.
5. **Dunn, R.M.**, Mancoll, J., Kaplan, I, Terzis, JK, Trengove-Jones, G. Experimental and Clinical Use of pH Monitoring of Free Tissue Transfers. Ann. Plast. Surg. 31: 539-545, 1993.
6. Rothkopf, D.M., Chu, B., Gonzalez, F., Borah, G., Ashmead, D., **Dunn, R.M.**: Radial and Ulnar Artery Repairs: Assessing Patency Rates with Color Doppler Ultrasonographic Imaging. J. Hand Surg. 18A: 626-8, 1993.
7. **Dunn, R.M.**, Fudem, G. and Walton, R: Free Flap Valvular Transplantation for Refractory Venous Ulceration. J. Vasc. Surg., Vol. 19, No. 3: 525-531, 1994.
8. Matory, W.E., O'Sullivan, J., Fudem, G., **Dunn, R.M.**: Panniculectomy as an Adjunct to Abdominal Surgery in the Morbidly Obese. Plast. Reconst. Surg. 94:7, 976-87.
9. **Dunn, R.M.**, Fudem, G., Walton, R.L. Free Flap Valvular Transplantation for Refractory Venous Ulceration. Phlebology Digest. 1: 28-31, 1995.

10. Ahararinejad, S., **Dunn, R.M.** and Fudem, G., Vernadakis, A., Beck, P., Furbas, W., Marks, S.: The Microvenous Valvular Anatomy of the Human Dorsal Thoracic Fascia, *Plast. Reconst. Surg.* 99:78-86,1997.
11. Doyle, J.W., Roth, T.P., Smith, R.M., Li, Y.Q., **Dunn, R.M.** The Effect of Calcium Alginate on Cellular Wound Healing Processes Modeled In Vitro. *J. Biomat. Res.* (32:561-568) (1996).
12. **Dunn, R.M.** Free flap Reconstruction in Chronic Venous Ulcers. *Young Microsurgeons Perspective, Reconstructive Microsurgery* 7:1, pg. 6. 1996.
13. **Dunn, R.M.** Overview of Terms: Microsurgery and Flap Physiology. *PSRC*, pg. 16-17, 1997-2001.
14. Gumbrel, F.P., Peura, R.A., Kun, S., **Dunn, R.M.** Development of a pH Based Tissue Ischemia Monitor: Preliminary Clinical Results. *Proceedings of International IEEE Engineering in Medicine and Biology Conference*, 1996.
15. **Dunn, R.M.** Clinical Guidelines and Outcomes, *Reconstructive Microsurgery* 12, 1997.
16. Aharinejad, S., **Dunn, R.M.**, Nomani, F., Vernadakis, A.J., Marks, S.C. Morphological and Clinical Aspects of Scapular Fasciocutaneous Free Flap Transfer for Treatment of Venous Insufficiency in the Lower Extremity. *Clin. Anat.* 11:38-41, 1998.
17. **Dunn, R.M.**, Vernadakis, A.: Long-Term Results Following Free Tissue Transfer for Venous Stasis Ulcers. *Invited Discussion. Annals Plastic Surg.* 41:2, 137-139. 1998.
18. Li, Y.Q., Doyle, J.D., Roth, T.P., **Dunn, R.M.**, Lawrence, W.T.: IL-10 and GM-CSF Expression and the Presence of Antigen-Presenting Cells in Chronic Venous Ulcers. *J. Surg. Res.* 79:128-135, 1998.
19. Gumbrel, G., Kun, S., Peura, R., **Dunn, R.M.**: Evaluation of a Minimally Invasive pH Based Microvascular Ischemia Monitor. *Journal of Clinical Engineering*, Vol. 23:5, pp.344-353, 1998.
20. Lundberg, J.E., Roth, T.P., **Dunn, R.M.**, Doyle, J., Lawrence, W.T. Western blot Analysis of IL-10 in Chronic and Acute Wound Tissue. *Plastic Surgery Research Council, Salt Lake City, UT; Wound Repair and Regeneration* v6, #3, pA260, 1998.
21. Muller, P., Peura, R., Mendelson, Y., **Dunn, R.M.**, Kun, S: An In Vitro and In Vivo Comparative Analysis of Four Tissue pH Monitoring Systems. *Journal of Biomedical Instrumentation and Technology. Biomedical Instrumentation and Technology* 1998, 32:656-667.
22. Kun, S., Ristic, B., Peura, R.A., **Dunn, R.M.** Real-Time Extraction of Tissue Impedance Model Parameters for Electrical Impedance Spectrometer. *Medical And Biologic Engineering and Computing*, 428-432. 1999.
23. Aharinejad, S., Nedwed, S., Michlets, W., **Dunn, R.M.**, Abraham, D., Vernadakis, S., Marks, S.C. Valvular Density Alone Cannot Account for Sites of Chronic Venous Insufficiency and Ulceration in the Lower Extremity. *Microcirculation* 2001, 8:347-54.

24. Shorrock, S., Kun, S., Peura, R.A., **Dunn, R.M.** Determination of a Relationship Between Bacteria Levels on Tissue pH in Wounds: Animal Studies, N.E.I.E.E.E., April 2000.
25. **Dunn, R.M.**, Lowenstein, A. A New Classification for the Standardization of Nomenclature in Free Flap Wound Closure. Invited Discussion. *Plast. Reconst. Surg.* (in press).
26. Kun, S., Ristic, B., Peura, R.A., **Dunn, R.M.** Real Time Extraction of Tissue Impedance Model Parameter for Electrical Impedance Spectrometry. *Medical and Biological Engineering and Computing* (Submitted 12/98).
27. **Dunn, R.M.**, Laddis, T., Rohrer, M.J.: Postural and Regional Variations in Microcirculation of Chronic Venous Insufficiency: Assessment by Laser Doppler Flowmetry (in preparation).
28. **Dunn, R.M.**, Maguire K., LeClair, W.S., Fudem, G.M. Cross-Leg Vascularized Osteomyocutaneous Tibial Transfer for Lower Extremity Reconstruction (In Preparation).
29. Silverman, R., **Dunn, R.M.**: The Semimembranosus-Semitendinosus Myocutaneous Flap: Anatomy and Clinical Applications (In Preparation).
30. **Dunn, R.M.**, Nguyen, T.: pH Monitoring in Experimental Compartment Syndrome (In Preparation).
31. **Dunn, R.M.**, Nguyen, T.: Fasciotomy Wound Closure (In Preparation).
32. **Dunn, R.M.** Tissue Spreading Forceps for Facilitated Wound Debridement (In Preparation).
33. Pap, S.A., **Dunn, R.M.** Gracilis Myocutaneous Flap Closure of Recurrent Ischial-Pubic Decubitus Ulcer (in preparation).

BOOK CHAPTERS:

1. Weinzweig, N., **Dunn, R.M.**, Leg Ulcers. In Plastic Surgery Secrets, Weinzweig, J. (ed.) Hanley & Belfus, 1998.
2. **Dunn, R.M.**, Rohrer, M.T., Vernadakis, A. Management of the Venous Ulcer Wound: Excision, Skin Grafting and Microsurgical Flaps. In Severe Chronic Insufficiency: Diagnosis and Treatment. Ballard, J.L., Bergan, J.J. eds. 2000.
3. Rohrer, M., **Dunn, R.M.**, Bergan, J. (ed.), Vernadakis, A.: Leg Ulcers: A Practical Approach to Management.

PRESENTATIONS:

1. **Dunn, R.M.** Overview of Monitoring in Free Tissue Transfer. Presented at the Workshop on Immediate and Early Breast Reconstruction, Norfolk, VA , 3/90.
2. **Dunn, R.M.**, Mancoll, J., Kaplan, I., Terzis, J. Experimental and Clinical Use of Tissue pH Monitoring. Presented at the Plastic Surgery Research Council Meeting, Washington, DC, 3/90, Plastic Surgery Senior Residents Conference, NY, NY, 4/90, and the ASPRS Annual Meeting, Boston, MA, 10/90.
3. **Dunn, R.M.**, Horton, C.E., Jones, G.T. One-Stage Total Penoscrotal Reconstruction.

New England Society of Plastic and Reconstructive Surgery Annual Meeting, 6/90.

4. **Dunn, R.M.**, Silverman, R. The Semimembranosus-Semitendinosus Myocutaneous Flap. New England Society of Plastic and Reconstructive Surgery, 6/91, Senior Residents Meeting, 5/92.
5. **Dunn, R.M.**, Fudem, G.M., Walton, R.L. Free Flap Valvular Transplantation for Refractory Venous Stasis Ulceration. New England Society of Plastic and Reconstructive Surgeons, 6/92, Northeastern Society of Plastic Surgeons, 10/92.
6. Nguyen, T., **Dunn, R.M.**, pH Monitoring in Experimental Compartment Syndrome. New England Hand Society, 12/92.
7. **Dunn, R.M.**, Fudem, G.M., Walton, R.L. Free Flap Valvular Transplantation for Refractory Venous Stasis Ulceration. American Venous Forum, Orlando, FL, 2/93.
8. Laddis, T., **Dunn, R.M.** Postural and Regional Variations in Microcirculation of Chronic Venous Insufficiency: Assessment by Laser Doppler Flowmetry. National Medical Student Research Forum, Galveston, TX, 4/93.
9. **Dunn, R.M.**, Fudem, G. The Microvenous Valvular Anatomy of the Human Dorsal Thoracic Fascia, New England Society of Plastic and Reconstructive Surgeons, 6/93.
10. **Dunn, R.M.**, Nguyen, T. Fasciotomy Wound Closure. New England Society of Plastic and Reconstructive Surgeons, 6/93.
11. Vernadakis, A., Aharingejad, S., **Dunn, R.M.**, Fudem, G., Marks, S.: The Role of the Scapular Veins in Patients with Venous Insufficiency, American Association of Clinical Anatomy, 6/93.
12. **Dunn, R.M.**, Fudem, G., Walton, R., Anderson, F., Malhotra, F.: Free Flap Valvular Transplantation for Refractory Venous Ulceration, American Society for Reconstructive Microsurgery, 9/93.
13. Marble, K., Rothkopf, D.M., Lach, E., **Dunn, R.M.**, Nerve Compression Secondary to Ganglions of the Hand. New England Hand Society, 12/93.
14. **Dunn, R.M.**, Fudem, G., Vernadakis, A., Aharingejad, S., Marks, S. The Microvenous Valvular Anatomy of the Human Dorsal Thoracic Fascia, **First prize research award.** American Venous Forum, 2/94.
15. **Dunn, R.M.**, Laddis, T., Rohrer, M.J. Postural and Regional Variations in Microcirculation of Chronic Venous Insufficiency: Assessment by Laser Doppler Flowmetry. American Venous Forum, 2/94.
16. O'Sullivan, J., Matory, W.E., **Dunn, R.**, Fudem, G., Panniculectomy as an Adjunct to Abdominal Surgery in the Morbidly Obese, American Association of Plastic Surgery New England Society of Plastic and Reconstructive Surgeons, 6/94.
17. Li, Ya-Qi, Doyle, J.W., Schenko, J., **Dunn, R.M.**, Roth, T.P., Malhotra, R. Pro- and Anti-Inflammatory Cytokines in the Skin of Patients with Chronic Venous Insufficiency Plastic Surgery Research Council, 5/95.
18. **Dunn, R.M.**, Shufflebarger, J., Gonzalez, F., LeClair, W.J. Double-Barrel Fibula Reconstruction of Tibial Defects, New England Society of Plastic and Reconstructive Surgeons Annual Meeting, 6/95.

19. Smith, R.M., Doyle, J.W., Roth, T.P., Li, Y-Q., **Dunn, R.M.** Glucose Inhibition of Microvascular Endothelial Cell Proliferation is Enhanced by Insulin. Wound Healing Society, 5/96.
20. Doyle, J.W., Smith, R.M., Roth, T.P., **Dunn, R.M.**, Lawrence, W.T. Glucose Directly Inhibits the Contraction of Fibroblast Populated Collagen Lattices. Wound Healing Society, 5/96.
21. Mooney, E.K., DiFrancesco, L., **Dunn, R.M.**, Mills, S., Caulkins, M., LeClair, W. Outcome of Tibial Shaft Fractures Requiring Bone Graft Reconstruction. New England Society of Plastic and Reconstructive Surgeons, 6/96.
22. Gumbrel, F.P., Peura, R.A., Kun, S., **Dunn, R.M.** Development of a pH Based Tissue Ischemia Monitor: Hardware Realization. 22nd Annual IEEE Biomedical Engineering Conference, 3/96.
23. Doyle, J.W., Li, Y-Q., Roth, T.P., **Dunn, R.M.** The Expression of Pro- and Anti-Inflammatory Cytokines in Chronic Venous Ulcers. Deutscher Phlebologenkongress 9/96.
24. Gumbrel, F.P., Peura, R.A., Kun, S., **Dunn, R.M.** Development of a pH Based Tissue Ischemia Monitor: Preliminary Clinical Results. 18th Annual International IEEE Engineering in Medicine and Biology Conference, 11/96.
25. Ristic, B., Kun, S., Peura, R.A., **Dunn, R.M.** Muscle Tissue Ischemia Monitoring Using Impedance Spectroscopy: Preliminary Animal Studies. Proceedings for IEEE/EMBS 18th International Conference, 11/96.
26. Ristic, B., Kun, S., Peura, R.A., **Dunn, R.M.** Muscle Tissue Ischemia Monitoring Using Impedance Spectroscopy: Quantitative Results of Animal Studies. Proceedings for IEEE/EMBS 19th Annual Conference, 5/97.
27. **Dunn, R.M.**, Gumbrel, G.P., Peura, R.A., Kun, S. Microelectronic Reduction of pH Drift in Free Flap Monitoring. American Society for Reconstructive Microsurgery, 1/97.
28. Lundberg, J., Doyle, J., Roth, T., **Dunn, R.M.** Western Blotting Analysis of IL-10 Concentrations in Human Chronic and Acute Wounds. WPI BME Conf. 3/97.
29. Gumbrel, G.P., Peura, R.A., Kun, S., **Dunn, R.M.** Development of a Minimally Invasive Microvascular Ischemia Monitor: Clinical Detection of Ischemia. 23rd Annual Northeast Bioengineering Conf. 5/97.
30. Pap, S., **Dunn, R.M.**, O'Sullivan, K. Gracilis Myocutaneous Flap Reconstruction of an Ischio-Pubic Decubitus Ulcer, New England Society of Plastic and Reconstructive Surgeons, 6/97.
31. O'Sullivan, K., Rothkopf, D., Silverman, R., **Dunn, R.M.**, Fudem, G. Orbital Reconstruction with Titanium Mesh. New England Society of Plastic and Reconstructive Surgeons, 6/97.
32. Gumbrel, G.P., Peura, R.A., Kun, S., **Dunn, R.M.** Development of a Minimally Invasive Microvascular Ischemia Monitor: Drift Reduction Results. 19th Annual International Conf. of the IEEE Engineering of Medicine and Biology Society, 11/97.

33. Doyle, J.W., Smith, R.M., Roth, T.P., **Dunn, R.M.**, Lawrence, W.T.: Interleukin-1 Alpha and Its Type I Receptor are Induced in Human Epidermal Cells by Wounding. Plastic Surgery Research Council, 4/98.
34. Li, Y.Q., Doyle, J.W., **Dunn, R.M.**, Lawrence, W.T.: High Affinity IgE Binding to Mast Cells in Acute and Chronic Wounds. Plastic Surg. Res. Council, 4/98.
35. Lundberg, J., Doyle, J., Roth, T.P., **Dunn, R.M.**, Lawrence, W.T.: Western Blot Analysis of IL-10 in Chronic and Acute Wound Tissue. Wound Healing Society, 6/98.
36. Doyle, J.W., Roth, T.P., Smith, R.E., Lawrence, W.T., **Dunn, R.M.**: Wounding of Cultured Human Epidermal Cells Induces the Signaling Pathway for IL-1 but not for TNF-Alpha. Wound Healing Society. 6/98.
37. Leclair, W., Wixted, J., Patterson, N.P., **Dunn, R.M.**, Yost, S., McCarthy, J., A Recent Look at Osteomyelitis Outcomes, Critical Issues in Surgery, 12/98.
38. Roth, T., Doyle, J., Smith, R., Li, Y.Q., **Dunn, R.M.**, Lawrence, W.T. IL-10 Inhibition of APC Function in Cultured Human Monocytes. Presented at ACS, 10/98.
39. **Dunn, R.M.**, Yost, S., Leclair, W., Shufflebarger, J.V., Rothkopf, D.M., Mady, B., Patterson, M., Hayden, D.B. Chronic Tibial Osteomyelitis Outcomes of Free Flap Reconstruction, American Society for Reconstructive Microsurgeons, 1/99.
40. **Dunn, R.M.**, Walton, R.L., Vernadakis, A., Fudem, G.M. Long Term Results of Fasciocutaneous Flap Reconstruction of Chronic Venous Ulceration, American Society for Reconstructive Microsurgeons, 1/99.
41. Diaz, M., **Dunn, R.M.** TAP Flap: Anatomy and Clinical Uses of Tibial Artery Perforator Flaps: New England Society of Plastic and Reconstructive Surgeons, 6/01.
42. Microsurgery Panel: Chronic Venous Reconstruction, ASPS, 11/01.
43. **Dunn, R.M.**, Diaz, M. TAP Flap: Anatomy and Clinical Uses of Tibial Artery Perforator Flaps: American Society for Reconstructive Microsurgeons, Jan 02.
44. **Dunn, R.M.**, Shorrock, S., Kun, S., Peura, R.: Use of Impedance in Tissue pH Monitoring. American Society of Reconstructive Microsurgery, Jan 02.
45. Rodriguez, AM., **Dunn, R.M.**, The Use of a Hydrogel in the Engineering of Skin: A Bilayer Approach. The Plastic Surgery Research Council, 46th Annual Meeting, Milwaukee, WI, 6/01.
46. Fudem, G.F., **Dunn, R.M.**, Rothkopf, D.M., Castle, J., Shufflebarger, J., and Lach, E. Outpatient Reduction Mammoplasty – A Protocol for the Modern Era, New England Society of Plastic and Reconstructive Surgeons, 6/02.
47. **Dunn, R.M.** Microsurgery in Chronic Wound Management: Germany Society of Plastic Surgery, Frankfurt, 9/02.

PRESENTATIONS (VIDEO):

1. **Dunn, R.M.** Free Flap Reconstruction of Venous Ulceration. American Society for Reconstructive Microsurgeons, 1/99.
2. Kelly, J., Litwin, D., **Dunn, R.M.** Handoscopic Omental Flap Reconstruction of Sternal Defect. SAGES, 1999.

POSTERS:

1. Muller, P., **Dunn, R.M.**, Peura, R.: Experimental Comparison of IFSET, Polymer and Glass Micro-pH Electrodes. Northeast Biomedical Engineering (Poster) - 1992.
2. Vernadakis, A., Aharinejad, S., **Dunn, R.M.**, Fudem, G., Marks, S.: The Role of the Scapular Veins in Patients with Venous Insufficiency, Presented at the Univ. of Massachusetts Medical School Senior Scholar's Day 1993.
3. **Dunn, R.M.**, Maguire, K., LeClair, W.J., Fudem, G.M. Cross-Leg Vascularized Osteomyocutaneous Tibial Transfer for Lower Extremity Reconstruction. American Society for Reconstructive Microsurgery, 1/95.
4. Li, Ya-Qi, Doyle, J.W., Schenko, J., **Dunn, R.M.**, Roth, T.P., Malhotra, R. Pro- and Anti-Inflammatory Cytokines in the Skin of Patients with Chronic Venous Insufficiency. Plastic Surgery Research Council, 5/95.
5. Marble, K., Rothkopf, D.M., Lach, E., **Dunn, R.M.**, Nerve Compression Secondary to Ganglions of the Hand. New England Hand Society, 12/94. American Society for Reconstructive Microsurgeons. 1/95.
6. Gumbrel, F.P., Peura, R.A., Kun, S., **Dunn, R.M.** Development of a pH Based Tissue Ischemia Monitor: Hardware Realization. WPI Graduate BME Conference 3/20/96.
7. Mooney, E.K., DiFrancesco, L., **Dunn, R.M.**, Mills, S., Caulkins, M., LeClair, W. Outcome of Tibial Shaft Fractures Requiring Bone Graft Reconstruction. American Society for Reconstructive Microsurgery 1/97.
7. Doyle, J.W., Roth, T.P., Smith, R.M., Li, Y-Q, **Dunn, R.M.** The effect of calcium alginate on cellular wound healing processes modeled in vitro, Wound Healing Society 5/95 Symposium on Advanced Wound Care on May 1-3, 1995.
9. Kashyap, A., Doyle, J.W., Y.Q., **Dunn, R.M.** Identification of IL-10 as an Immunosuppressive Factor in Chronic Wound Fluid, Plastic Surgery Research Council, 2/97.
10. **Dunn, R.M.** "Freeze" Flap: Cryologic Free flap Compromise and Salvage. American Society for Reconstructive Microsurgeons, 1/99.
11. Rodriguez, A.M., **Dunn, R.M.**, Claytor, B., Kamil, S., Bonassar, L., Vacanti, M., and Vacanti, C. "The Use of a Hydrogel in the Engineering of Skin: A Bilayer Approach.", Annual Scientific Meeting, San Antonio, TX, 11/2002.

COURSES AND SYMPOSIA DIRECTED:

1. Wound Management in Primary and Long Term Care. Worcester, MA 2000, 2001, 2002
2. Suturing Techniques and Wound Closure Skills, UMMHC Wound Conference, 10/01.

POSTGRADUATE COURSES:

1. Free Tissue Transfer in the Treatment of Venous Stasis Ulcers, ACS #13, pg. 18-20, 10/95.
2. Lower Extremity Vascular Salvage, ACS: panel 10/7/96.
3. Lower Extremity Trauma: Soft Tissue Reconstruction Lower Extremity Trauma. 1996; 10/11/96.
4. State of the Art, Surgical Management of Venous Stasis Ulceration, ASPRS/PSEF Instructional Course; 11/96, 9/97, 10/98, 10/99.
5. Results of Fasciocutaneous Flaps in Venous Ulcer Reconstruction, ACS, 10/99.
6. Microvascular Flap Reconstruction of Intractable Venous Ulceration. ASRM, 1/00, 1/01.

PUBLISHED ABSTRACTS:

1. Doyle, J.W., Roth, T.P., Smith, R.M., Li, Y-Q, **Dunn, R.M.** The effect of calcium alginate on cellular wound healing processes modeled in vitro. Wound Rep. Reg. (1995) 3:87.
2. Li, Ya-Qi, Doyle, J.W., Schenko, J., **Dunn, R.M.**, Roth, T.P., Malhotra, R. Pro- and Anti-Inflammatory Cytokines in the Skin of Patients with Chronic Venous Insufficiency Plastic Surgery Research Council, 5/95.
3. Gumbrel, F.P., Peura, R.A., Kun, S., **Dunn, R.M.** Development of a pH Based Tissue Ischemia Monitor: Hardware Realization. Proceedings of 22nd Annual IEEE Biomedical Engineering Conference 3, 1996.
4. Gumbrel, F.P., Peura, R.A., Kun, S., **Dunn, R.M.** Development of a pH Based Tissue Ischemia Monitor: Preliminary Clinical Results. Proceedings of the 18th Annual International IEEE Engineering in Medicine and Biology Conference, 11/96.

**INVITED SYMPOSIA AND GRAND ROUNDS/PANEL PRESENTATIONS/
MODERATIONS:**

1. Reconstruction of Lower Extremity Injuries. Third Annual New England Regional Trauma Conference. April, 1994.
2. Chronic Venous Insufficiency and Ulceration: Medical and Surgical Management. Monadnock Regional Hospital, N.H., April, 1994.
3. Evaluation and Management of Lower Extremity Trauma. UMass Department of Orthopedics Grand Rounds, April, 1994.

4. Free Flap Reconstruction in Chronic Venous Insufficiency. Harvard Venous Symposium, June, 1994.
5. Lower Extremity Trauma reconstruction. Monadnock Regional Hospital, NH April, 1995.
6. Post-Operative Monitoring of Free Flaps. Mass. Assoc. of Post-Anesthesia Nursing, October 21, 1995.
7. How to Survive a Residency Site Visit, Amer. Assoc. of Plastic Surgery Assistants, October 1995.
8. Free Flap Reconstruction in Chronic Venous Ulceration. Mass. Gen. Hospital Dept. of Plastic Surgery. December 19, 1996.
9. Surgical Reconstruction of Chronic Venous Ulceration, Brown, Rhode Island Hospital, April 23, 1997.
10. Free Flap Reconstruction in Chronic Venous Ulceration. Brigham and Women's Hospital, 5/23/97.
11. The Outcomes' Movement and its Importance to Plastic Surgery. Panel Presentation ASRM 7/12/97.
12. Surgical Management of Decubitus Ulcers: Eleanor Slater Hospital Symposium on Ischemic Wound Care. 10/1/97.
13. Microvascular Reconstruction: ASPRS; 1997 Session Moderator.
14. Wound Healing II, ACS, 1997 Session Moderator.
15. Plastic Surgery Research Council: Session Moderator. 4/98, 8/99, 6/2000.
16. American Society of Reconstructive Microsurgery, 1/2000, 1/01.
17. "Current Management of Venous Stasis Disease": ACS, 10/00.

THESES SUPERVISED:

<u>Summary:</u>	<u>Total</u>	<u>Completed</u>	<u>In Progress</u>
Bachelors	9	9	0
Masters	5	5	0

THESES:

Masters

- | | | | |
|----|---|-------------------|------|
| 1. | A Comparative Analysis of Four Tissue pH Monitoring Systems. | Paul Muller | 1993 |
| 2. | Development of a System Designed to Eliminate Reference Electrode Drift in Long-Term Tissue pH Monitoring | Robert Harrington | 1994 |
| 3. | Microelectronic Reduction of pH Drift in Free Flap Monitoring | George Gumbrel | 1997 |
| 4. | Exploration of Tissue pH in Wounds and Its Relationship to Bacterial Contamination | Susan Shorrocks | 2000 |
| 5. | Tissue Ischemia Monitoring Using Impedance Spectroscopy: Clinical Evaluation | Jocelyn Songer | 2001 |

Baccalaureate

- | | | | |
|-----|--|---|------|
| 1. | Surgical Instrument Design | Richard Doppler
Marc Caseres | 1992 |
| 2. | The Right to Healthcare and Reformation of Healthcare Policy | Mark Burke
Jeff McKinney | 1993 |
| 2. | Breast Implants: Healthcare Issues | Joseph T. Flanagan
Brett S. Peroni
Linh T. Vu
Steven Yarry | 1993 |
| 4. | Design of an Automatic Suturing Device | Michael Casey
Anthony Sacchetto
Marc Warren | 1994 |
| 6. | Cost of Innovation of Surgical Instruments | Ian Osborn
Sarkis Chekyian | 1994 |
| 7. | Design and Construction of a Moving Wheelchair Cushion | Ann M. Cournoyer
Jeffrey S. Mullen | 1995 |
| 7. | Surgical Instrument Design | Raul Arizpe
Thomas Comey
Peter Marshall | 1995 |
| 8. | Endoscopic Carpal Tunnel Release Device | Zung Nguyen
Iboro | 1996 |
| 9. | Tissue Everting Forceps | Jennifer Johnson
Kristen Stagg | 1996 |
| 10. | Surgical Instrument Patent | Michele Provencher
Sylvia Puchovsky
Daniel Shave | 1996 |

- | | | | |
|-----|---|--|------|
| 11. | Reduction of Electronic Drift in pH Measurement | Susan Shorrock | 1998 |
| 12. | Suture Assist Device (Awarded “Best MQP”) | David Spitz
Malgorzatn Machate
Tom Egan (UMMS) | 2002 |

LECTURES/PRESENTATIONS/TEACHING SESSIONS (IN-HOSPITAL/SCHOOL)

- | | | | |
|-----|---|--------------------------------|----------------|
| 1. | Tissue pH Monitoring: Experimental and Clinical Results
Plastic Surgery Grand Rounds | | 1/90 |
| 2. | Clinical and Experimental Aspects of Venous Stasis Ulceration
Dept. of Surgery Research Conference
Plastic Surgery Grand Rounds | | 10/90
11/90 |
| 3. | Evaluation and Management of Soft Tissue Inujury and Fractures
3rd Year Medical Student Core Lecture/Case Studies
Presented January, April, July, October 1991-1995 and
<u>ongoing</u> | | |
| 4. | Reconstruction of Deformities and Defects of Knee, Leg and Foot
Plastic Surgery Anatomy Course (Lecture and Cadaver
Dissection) <u>Annual</u> | 12/91, 12/92, 3/16/94, 1/25/95 | |
| 5. | Reconstruction of Pelvic and Perineal Deformities and Genital
Reconstruction, Plastic Surgery Anatomy Course <u>Annual</u>
(Lecture and Cadaver Dissection) | 12/91, 12/92, 3/17/94, 1/26/95 | |
| 6. | Anatomic and Clinical Correlations of Compartment Syndrome
American Association of Clinical Anatomy
(Lecture and Anatomic Demonstration) | | 6/93 |
| 7. | Complex Maxillofacial Trauma
Plastic Surgery Clinical Rounds (residents & students) | | 2/12/94 |
| 8. | Debridement of Infected Knee Wounds
Plastic Surgery Clinical Rounds (residents & students) | | 3/5/94 |
| 9. | Lower Extremity Trauma Reconstruction
Orthopedic Core Lecture Series | | 4/94 |
| 10. | Sternal Reconstruction
Plastic Surgery Clinical Rounds (residents & students) | | 4/16/94 |
| 11. | Leg Transplantation
Plastic Surgery Clinical Rounds (residents & students) | | 5/94 |
| 12. | Basic Management of Lower Extremity Trauma
Plastic Surgery Clinical Rounds (residents & students) | | 7/23/94 |
| 13. | Wound Debridement
Plastic Surgery Clinical Rounds (residents & students) | | 9/94 |

14.	Decubitis Ulcer Reconstruction Plastic Surgery Clinical Rounds (residents & students)	10/94
15.	Bone Flaps in Lower Extremity Reconstruction Plastic Surgery Clinical Rounds (residents & students)	11/12/94
16.	Double Barrel Fibula Free Flap Plastic Surgery Clinical Rounds (residents & students)	12/94
17.	Venous Ulcer Reconstruction with Free Flaps Plastic Surgery Clinical Rounds (residents & students)	1/7/95
18.	Hand Infections Plastic Surgery Clinical Rounds (residents & students)	2/95
19.	Flaps & Skin Grafts General Surgery Core Lecture	4/19/95
20.	Free Flap Reconstruction for Refractory Venous Stasis Ulceration (part of Ellinwood Vascular Surgery Symposium at Univ. of Mass. Med. Ctr)	5/11/95
21.	Microsurgery Instructional Laboratory (UMMC)	8/26/95
22.	Upper Extremity Anatomy Review	11/30/95
23.	Upper Extremity Anatomy Review	12/1/95
24.	Extremity Anatomy (Didactic: Medical Students)	12/8/95
25.	Pelvic Reconstruction (Plastic Surgery Anatomy Course)	1/19/96
26.	Clinical Flap Applications in the Leg (Plastic Surgery Anatomy Course)	1/24/96
27.	Management of Maxillofacial Trauma (General Surgery Core Lecture)	4/19/96
28.	Practical Management of Venous Stasis Ulceration Regional VNA Symposia	5/96
29.	Lower Extremity Ulcers: Etiology and Management Post-Graduate Enterostomal Nursing	10/15/96, 9/97, 10/1/98
30.	Free Flaps in Venous Stasis Ulcers Grand Rounds, Dept. of Surgery, UMass	6/97
31.	Osteomyelitis Management; S.I.T. Presentations (multiple)	8/97
32.	Sternal Osteomyelitis Cardiac Surgery Grand Rounds, UMass	6/98

- 33. Lower Extremity Trauma Reconstruction
Grand Rounds, Dept. of Surgery, UMass 3/99
- 34. Tibial Osteomyelitis
Grand Rounds, Dept. of Surgery, UMass 5/00
- 35. Wound Healing 2001/
Medical Student Core Lecture 2002

EXHIBIT B

Materials Reviewed

Exhibit B, Declaration of Raymond Dunn, M.D.

Vera Institute of Justice, *Care First L.A.: Tracking Jail Decarceration*

<https://www.vera.org/care-first-la-tracking-jail-decarceration>.

Los Angeles Sheriff's Mental Health Count, May 9, 2023, https://lasd.org/wp-content/uploads/2023/05/Transparency_Custody_LASD_Mental_Health_Count_050923.pdf

K.R. Quandt and A Jones, *Research Roundup: Incarceration Can Cause Lasting Damage to Mental Health*, (May 13, 2021),

<https://www.prisonpolicy.org/blog/2021/05/13/mentalhealthimpacts/>

Chapter, T.A. Kupers, M.D., M.S.P, *Posttraumatic Stress Disorder (PTSD) in Prisoners*, published in Managing Special Populations in Jails and Prisons, ed. Stan Stojkovic, (Kingston, NJ: Civic Research Institute, 2005).

The Association Between Trauma Experienced During Incarceration
Healthy People 2030, U.S. Dep't of Health and Human Services, Office of Disease Prevention and Health Promotion, *Social Determinants of Health Literature Summaries: Incarceration*, <https://health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries/incarceration#:~:text=Studies%20have%20shown%20that%20when,%20hepatitis%20C%20and%20HIV.>

Laura M. Maruschak, BJS Statistician, Marcus Berzofsky, Dr.P.H. & Jennifer Unangst, U.S. Dep't of Just., Bureau of Justice Statistics, *Medical Problems of State and Federal Prisoners and Jail Inmates*, 2011-2012 (rev. Oct. 4, 2016), <https://bjs.ojp.gov/content/pub/pdf/mpsfpi1112.pdf>.