DECLARATION OF DR. LINDA R. NUSSBAUM

I, Dr. Linda Nussbaum, M.D., declare as follows:

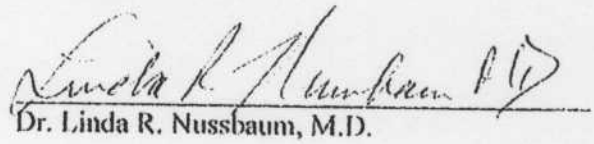
1. I am a pediatrician with the office of Gordon Nussbaum and Lappin Mds. I received my doctorate in medicine from the University of Pennsylvania, and did my residency in pediatrics at Children's Hospital Los Angeles. I have been a practicing pediatrician since 1980. I make this declaration of personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.

2. I have been treating Oksana Grigorieva and Mel Gibson's daughter, Lucia, since she was approximately 7 ½ weeks old. On January 7, 2010, Ms. Grigorieva brought Lucia in to check on a protrusion on Lucia's belly button. I examined Lucia's belly button and told Ms. Grigorieva that it was a normal umbilical hernia that would resolve itself. The belly button hernia is not caused by trauma and had been present at a previous examination of Lucia. In Lucia's case, the hernia eventually went away.

3. When I examined Lucia on January 7th, to the best of my recollection, I did not see any symptoms of trauma, abuse, bruising, redness or injury on her face, head or elsewhere on her body. Ms. Grigorieva did not state to me that Lucia had suffered any trauma, abuse or injury of any kind. I have also reviewed my notes from the January 7th appointment. My notes do not reflect that I observed that Lucia was injured, either. If I had observed any symptoms that indicated injury or abuse or if Ms. Grigorieva had raised the issue of injury or abuse, I would have certainly noted those details in my records. I would have also reported any allegations of parental abuse to Social Services.

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

Executed on June 24, 2010, at Santa Monica, California.



Dr. Linda R. Nussbaum, M.D.