

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
FOURTH JUDICIAL DISTRICT AT FAIRBANKS

In Re 2011 Redistricting Cases.

CONSOLIDATED CASE NO.:

) **4FA-11-2209-CI**

) 4FA-11-2213 CI

) 1JU-11-782 CI

) 4FA-13-2435 CI

**DECLARATION OF MICHAEL D. WHITE IN SUPPORT OF ALASKA
REDISTRICTING BOARD'S MOTION TO CONTINUE TRIAL**

I, Michael D. White, do hereby state and declare under the penalty of perjury that the following statements are true and correct to the best of my knowledge and belief:

1. I am a partner at Patton Boggs LLP, and lead counsel for the Alaska Redistricting Board ("Board"). I make this declaration in support of the Board's Motion to Continue Trial. I make the following declarations based upon my personal knowledge and if called as a witness, I could and would testify competently to the facts set forth herein under oath.

2. On August 5, 2013, I was diagnosed with a form of skin cancer in my mouth and jaw.

3. On August 7, 2013, I consulted with an expert in head and throat cancer, and scheduled an appointment in Seattle for a consultation with a leading specialist at Virginia Mason.

4. On August 15, 2013, I met with a leading specialist at Virginia Mason in Seattle, and underwent a CT-scan. I was advised that the cancer was localized and very

slow growing, but there were small tumors in my jaw and hard pallet that needed to be surgically removed.

5. Surgery was scheduled for September 5, 2013, and was supposed to take only one and one-half to two hours with a short hospital stay of three to five days. I was to start radiation treatment several weeks later, and would have completed my treatment by the end of October. I advised my staff and work plans were made accordingly.

6. Unfortunately, nothing went as expected. I reported for surgery on September 5, 2013, and was prepped, put under anesthesia, and taken into the operating room at which time the surgeon discovered the tumors were far more expansive than seen on the CT-scan. Due to the necessity of a far more invasive and expansive surgery than previously anticipated, including several skin grafts, surgery was postponed until September 9.

7. On September 9, 2013, I underwent an operation that lasted more than four hours and included two separate skin grafts. Instead of a three to five day hospital stay, I was in the hospital for a total of sixteen days, during which time I underwent three additional surgical procedures. I was finally released on the evening of September 24, 2013.

8. As a result of the more extensive surgery, longer aftercare has been necessary and I must remain in Seattle until at least October 12, 2013.

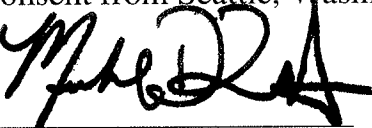
9. I am currently scheduled to begin radiation treatment in mid-October, and will continue until the Thanksgiving holiday. My radiation treatment includes daily

radiation five times each week, for six weeks, with only weekend respite. As a result, I cannot attend trial in Fairbanks during my radiation treatment. Moreover, I have been informed the radiation treatments will be physically taxing. I will also likely lose the ability to speak and eat for several weeks as the radiation treatment essentially creates a severe sunburn in my mouth and throat, and will require that I receive my nutrition through a feeding tube in my stomach.

10. If the trial is continued until December, my medical treatment should be complete and I will be able to participate at trial.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Executed on September 27, 2013, with consent from Seattle, Washington.



Michael D. White

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of September 2013, a true and correct copy of the foregoing document was served on the following via:

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