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9 Shang, M.D.)

10 SUPERIOR COURT FOR THE STATE OF CALIFORNIA

11 [REDACTED]

12 Plaintiffs,

13 vs.

14 BARBARA HA-SUI SHANG, M.D., and
15 DOES 1 through 100, inclusive

16 Defendants.

17) CASE NO. 30-[REDACTED]-CU-[REDACTED]

18) ASSIGNED FOR ALL PURPOSES TO
19) JUDGE [REDACTED] DEPARTMENT) [REDACTED]

20) Complaint Filed: [REDACTED]
21) Trial Date: [REDACTED]

22) **DECLARATION OF DEFENDANT
23) BARBARA YA-HUI SHANG, M.D. IN
24) SUPPORT OF MOTION FOR SUMMARY
25) JUDGMENT**

26) **Date: August 28, 2014**

27) **Time: 2:00 p.m.**

28) **Dept:**

Reservation: 71961811

23 I, Barbara Y. Shang, M.D., declare:

24 1. I have personal knowledge of all facts contained within this declaration. If called
25 as a witness, I could and would competently testify regarding these facts.
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1 2. In August 2011, for all routine patient examinations in my office, all equipment
2 surfaces in contact with any patient were wiped with 70% ethanol. This included, but was not
3 limited to, the forehead rest, chin rest, tonometer tip, and occluder.

4 3. In August 2011, for all patients examined for any type of conjunctivitis or
5 suspected conjunctivitis, the tonometer tip was immersed in a 1:10 dilution of bleach for 5 to 10
6 minutes, rinsed in tap water and dried. My office maintained two tonometer tips for the
7 examination room, which were switched off during the sterilization process. At the end of each
8 clinic day, the tonometer tips were soaked in diluted bleach.

9 4. In August 2011, when any patient was suspected of or diagnosed with
10 conjunctivitis or suffering from any cold-like symptoms, all contact surfaces in the examination
11 room were wiped down with a 70% ethanol solution or diluted bleach solution. Similarly, after
12 seeing such a patient, the lobby and waiting room of the office were also cleansed with a 70%
13 ethanol solution or diluted bleach solution.

14 5. A weekly cleaning service provides basic cleaning and janitorial services at my
15 office and did so in August 2011.

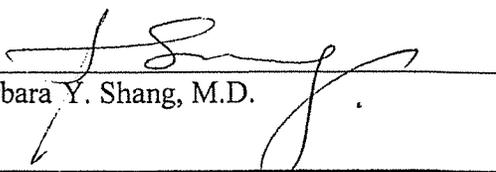
16 6. Between August 1, 2011 and August 17, 2011, I did not diagnose any patient as
17 suffering from or contracting epidemic keratoconjunctivitis. Moreover, other than [REDACTED]
[REDACTED], I am unaware of any

19 patients that I treated between August 1, 2011 and August 17, 2011 who contracted epidemic
20 keratoconjunctivitis. Indeed, other than [REDACTED] [REDACTED] no patient
21 has ever alleged or stated that they contracted epidemic keratoconjunctivitis from my office.

22 7. There has never been an outbreak of epidemic keratoconjunctivitis at my office.

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

25 Executed on May 28, 2014 at Irvine, California.

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Barbara Y. Shang, M.D.