

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK

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In re:

Case No. 19-20905

THE DIOCESE OF ROCHESTER,

Chapter 11

Debtor.

**DECLARATION**

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I, **Anthony M. Maroldo, MD**, hereby declare under penalty of perjury as follows:

1. Bishop Emeritus Matthew H. Clark has been my patient since August 2018 in connection with the diagnosis, assessment and treatment for Alzheimer's disease.

2. Attached to this Declaration is a letter dated January 13, 2020 that I provided to the attorney for Bishop Emeritus Clark, Mary Jo S. Korona, Esq., about Bishop Emeritus Clark and the effects of Alzheimer's disease on his ability to participate in a deposition. The statements made in the attached letter dated January 13, 2020 are true.

DATED: January 30, 2020

/s/ Anthony M. Maroldo, MD  
ANTHONY M. MAROLDO, MD

# Department of Neurology

**Anthony M. Maroldo, MD**  
Associate Professor of Clinical Neurology



January 13, 2020

Mary Jo S. Korona, Esq.  
Adams Leclair LLP, Attorneys  
28 East Main Street, Suite 1500  
Rochester, NY 14614


RE: Bishop Emeritus Matthew H. Clark

To Whom It May Concern:

This letter is regarding my patient Bishop Emeritus Matthew H. Clark. I am writing in response to a request made by his attorney to provide a clinical opinion of his ability to participate in a deposition proposed by parties associated with pending legal proceedings involving the Diocese of Rochester, and of the likely impact that participating in such a deposition would have on him. I have authorized Bishop Clark's Legal Counsel, Mary Jo S. Korona, Esq., to use this letter to provide legal representation to him in relationship to pending legal proceedings involving the Diocese of Rochester. I am a general neurologist, and I have been employed as a member of the clinical faculty of the University of Rochester Medical Center Department of Neurology since 2007. I have an active, unrestricted medical license issued by New York State. I am board certified in Neurology by the American Board of Psychiatry and Neurology. During my career I have diagnosed and treated dozens of patients with Alzheimer's dementia.

Bishop Clark has been my patient since August 2018. I first diagnosed him with Alzheimer's dementia in July 2019. This disease causes him to experience impairment of memory retrieval and impairment of his ability to formulate and express his thoughts verbally and in written communication. His memory impairment limits his ability to assimilate and recall information presented in lengthy or complex questions and his ability to recall past events. His language impairment limits his ability to formulate clear, cogent, and reliable responses to such questions. It is necessary to have an aide accompany him to his appointments with me to corroborate or correct the history he provides, to provide observations of impairment of which he may not have full awareness, and to participate in discussions of plans for ongoing management. He has experienced, and others who know him well have observed, that he tires easily, and that his cognitive impairment worsens when he is tired or stressed. It is my opinion that preparing for and participating in a deposition would very likely cause Bishop Clark to experience anxiety, frustration, stress, and irritability that would further impair his ability to comprehend and provide reliable responses to questions asked during a deposition.

Regards,

  
Anthony M. Maroldo, MD