

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
No. 7:23-cv-01576

EDGAR ALLEN PETERSON, IV, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
UNITED STATES OF AMERICA, )  
 )  
Defendant )

**DECLARATION OF EDGAR ALLEN PETERSON, IV**

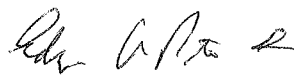
Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am over the age of eighteen (18) years and of sound mind. I reside in Shelby County, Tennessee. I have personal knowledge of the facts sworn to in this Affidavit.
2. I was born November 10, 1948.
3. I was diagnosed with Parkinson's Disease on or around May 23, 2001.
4. Over the past 23 years, my disease has rapidly progressed.
5. In April 2004, I was working as an attorney at the Hardison Law Firm and I was deemed to no longer be fit to act as an attorney based on my condition.
6. In December 2004, I underwent surgery to place a deep brain stimulator (DBS) to attempt to relieve some of the Parkinson's disease symptoms. I have since had approximately seven (7) surgical interventions to replace the battery and update the device.
7. Despite the DBS, from 2004 to 2020, my symptoms of stiffness, slowness, speech difficulty, dyskinesia, freezing, and gait imbalance significantly increased and ultimately affected my mobility, causing me to fall frequently.
8. On or around October 2020, I required a walker for ambulating.
9. On or around June 2021, it became increasingly more difficult for me to walk, and a wheelchair became necessary.
10. I have lost the ability to produce speech to the point where I am unintelligible. My wife must interpret what I say. Currently, my condition has severely deteriorated where the DBS does not allow me to produce any speech.

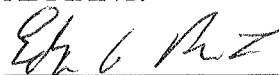
11. I try to communicate through speech software, which is often inaccurate as to what I intend to say.
12. On February 8, 2024, my deposition testimony was taken. Although I utilized the speech software, I was not able to fully participate in answering the questions and I was not able to provide adequate testimony. As my condition continues to deteriorate, I will not be able to effectively provide testimony at all.
13. Due to my Parkinson's disease, I have lost my employment, my ability to speak, my mobility and my self-identity. I am entirely reliant on my wife, Lori Peterson, for all basic functions in my life.
14. At times I am unable to breathe, and I go into hyperventilation, which has taken me to the emergency room. I have been informed that my condition will continue to deteriorate to the point that I may stop breathing.
15. Each day that passes is another deteriorating day.
16. My Parkinson's disease has given me a life sentence without the possibility of parole, but I remain "Semper Fidelis" that I am alive to go to trial.

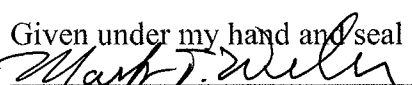
I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 25<sup>th</sup> of April, 2024.

  
 \_\_\_\_\_  
 Edgar A. Peterson, IV.

IN WITNESS WHEREOF, I have hereunto set my hand and seal on this 25<sup>th</sup> day of APRIL, 2024.

AFFIANT:  
  
 \_\_\_\_\_

Given under my hand and seal of office, this 25<sup>th</sup> day of APRIL 2024.  
  
 \_\_\_\_\_  
 Notary Public

**My Commission  
 Expires Nov. 09, 2025**

[SEAL]

