

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF CASS

EAST CENTRAL JUDICIAL DISTRICT

Josiah Flatt by and through his Natural
Guardians Anita Flatt and James Flatt,

Civil No. 99-3761

Plaintiffs,

**AFFIDAVIT OF SUNITA A.
KANTAK, M.D.**

vs.

Sunita A. Kantak, M.D., and MeritCare
Medical Center,

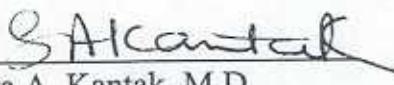
Defendants.

I, Sunita A. Kantak, M.D., duly sworn, state as follows:


1. I have reviewed the Intact video of a circumcision, which was provided by Mr. Baer in this case.
2. I do not perform circumcisions in the same manner as the person shown in the Intact video. The person in the Intact video did not use a dorsal penile nerve block prior to performing the circumcision. I give the child a dorsal penile nerve block prior to performing the circumcision. It did not appear that any anesthetic was used prior to the circumcision in the Intact video. The child in the Intact video was not given a sugar pacifier, which is also different than my procedure. I also swaddle the baby's upper extremities during the circumcision and do not restrain the child's arms in the circumstraint.
3. The child in the Intact video also appeared to be older than a newborn. Josiah Flatt was a newborn when he was circumcised. I perform circumcisions only on newborns. If parents wish to have a circumcision done on their child after a week of age, I refer them to a urologist for the procedure.
4. The person in the Intact video did not use the same disinfecting or sterilizing technique that I use.
5. I do not separate adhesions from the glans penis in the same manner as the person in the Intact video. I also wait for two minutes after pressure is applied on the crush line before making the dorsal slit. I do not insert the bell of the Gomco clamp in the same manner as the person in the Intact video or bring the foreskin through the hole of the base plate in the same manner as the person in the Intact video. I use a safety pin, which the person in the Intact video did not use. I am gentle in applying the clamp.

6. I wait with the foreskin between the bell and the base plate for seven minutes before excising the foreskin at the base plate. The person in the Intact video did not wait before cutting the foreskin.
7. I have reviewed the video titled "Circumcision" produced by David Garrigus Video and Film Productions, which was provided by Mr. Baer in this case.
8. I do not use the Plastibell or Mogen circumcision techniques that were shown in the video and have never observed them being used. I used a technique using the Gomco clamp for Josiah Flatt's circumcision.
9. It is my understanding that the child's upper extremities were not swaddled for the procedures shown in the "Circumcision" video.
10. It is my understanding that video of these circumcision procedures was edited for the final version. I do not know how long the person performing the circumcision with the Gomco clamp waited after giving the dorsal penile nerve block before performing the circumcision. I do not know how long the person waited before making the dorsal slit after applying pressure on the crush line or how long the person waited before excising the foreskin after applying the clamp. The person using the Gomco clamp in the "Circumcision" video did not use a safety pin like I do in performing the procedure.
11. The person performing the circumcision held the penis, separated the adhesions, and made the dorsal slit in a different manner than I do. I separate the adhesions and make the dorsal slit by use of clamps in a manner that requires much less handling of the penis. The person in the video used a probe for releasing the adhesions, which I do not use. He used the scissors for making the dorsal slit differently than I do, and pulled back the foreskin after making the dorsal slit differently than I do. These differences also appeared in the Intact video.
12. When I inject local anesthesia, I make only one injection site. I believe the person in this video used two injection sites.
13. It is impossible to determine from the "Circumcision" video footage what type of anesthesia or dosage was used for the dorsal penile nerve block injection or the person's experience in administering the injection.

Dated this 9th day of January, 2003.


Sunita A. Kantak, M.D.

Subscribed and sworn to before me this 9th day of January, 2003.


Notary Public

