

5. As a member of the School of Medicine's Promotion and Honors Committee to which the tenure dossier of Renee Hartz, M.D., was referred, I have firsthand personal knowledge of the facts contained in this affidavit.

6. Renee Hartz's tenure dossier was referred to the School of Medicine's Promotion and Honors Committee for determining whether she was qualified for an award of tenure.

7. On May 20, 2002, after reviewing Renee Hartz's tenure dossier, the School of Medicine's Promotion and Honors Committee, determined that Renee Hartz was qualified for tenure at Tulane University School of Medicine.

8. After determining that Renee Hartz was qualified for tenure at Tulane University's School of Medicine, the School of Medicine's Promotion and Honors Committee voted 7 to 2 in favor of a recommendation to award her tenure.


9. Thereafter, a recommendation to award tenure was forwarded to the Tulane University School of Medicine's Executive Faculty Committee ("Executive Faculty Committee") - an administrative committee despite its title.

10. The School of Medicine's Promotion and Honors Committee's recommendation to award Renee Hartz tenure was rejected by the Executive Faculty Committee.

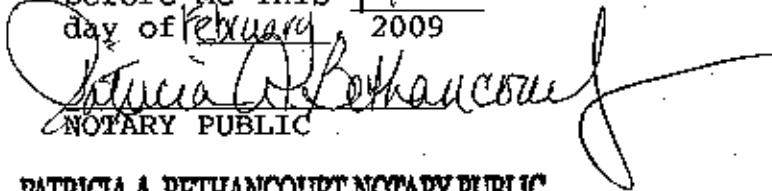
11. Thereafter, the School of Medicine's Promotion and Honors Committee considered the Executive Faculty Committee's rejection of its recommendation to award tenure.

12. On July 15, 2002, the School of Medicine's Promotion and Honors Committee considered the Executive Faculty Committee's

rejection of its recommendation to award Renee Hartz tenure, and again the School of Medicine's Promotion and Honors Committee recommended tenure.


Philip Kadowitz, Ph.D.

Sworn To And Subscribed
Before Me This 14th
day of February, 2009


NOTARY PUBLIC

PATRICIA A. BETHANCOURT, NOTARY PUBLIC
(Louisiana State Bar Roll No. 20699)
(My Commission Expires Upon Death)