

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION

JEFFREY THELEN,

Plaintiff,

v.

SOMATICS, LLC; and  
ELEKTRIKA, INC.,

Defendants.

Case No.: 8:20-cv-01724-TPB-JSS

Hon. Thomas P. Barber

**PLAINTIFF'S SUBMISSION OF HIGHLIGHTS OF MEDICAL OR  
SCIENTIFIC LITERATURE IN SUPPORT OF DR. BENNET OMALU'S  
OPINIONS ON GENERAL CAUSATION**

Pursuant to the Court's Order dated May 3, 2023 (Dkt. 156), Plaintiff, Jeffrey Thelen, hereby submits highlighted copies of medical or scientific literature in support of Dr. Omalu's opinions on general causation.

- No. 1:** 2002 NYS Assembly Report on Electroconvulsive Therapy
- No. 2:** Allen, (1959) Cerebral Lesions from ECT
- No. 3:** Alpers, B (1946) The Brain Changes Associated with Electrical Shock Treatment
- No. 4:** Alpers and Hughes, (1942) Cats Brain Damage Animals
- No. 5:** Alpers and Hughes, (1942) Human autopsy studies Brain Damage
- No. 6:** Calloway, (1982) ECT and cerebral damage

- No. 7:** Dubey, (2017) Electroconvulsive Therapy and Brain Damage-  
Survey of the Evidence
- No. 8:** Fink, (1978) Efficacy and Safety of Induced Seizures (EST) in  
Man, Compr Psychiatry
- No. 9:** Fosse, R & Read, J (2013) Electroconvulsive treatment  
Hypotheses About Mechanisms of Action
- No. 10:** Friedberg, (1977) Shock Treatment Brain Damage and  
Memory Loss
- No. 11:** Giles, (2002) Overview Brain Damage Memory Loss
- No. 12:** Guyton AC and Hall JE, eds. Medical Physiology, 10th  
edition, 2000
- No. 13:** Hartelius, (1952) Animals Brain damage Definitive
- No. 14:** Henshall, DC & Meldrum, BS (2010) Cell Death After Single  
and Repeated Brief Seizures
- No. 15:** Henshall DC, Meldrum BS. Cell Death and Survival  
Mechanisms After Single and Repeated Brief Seizures. In:  
Noebels JL, Avoli M, Rogawski MA, et al., editors.
- No. 16:** Jasper's Basic Mechanisms of the Epilepsies, 4th edition.  
Bethesda (MD): National Center for Biotechnology  
Information (US), 2012.

- No. 17:** Knight, et al., Knight's Forensic Pathology, Chapter 12, 4<sup>th</sup> edition, 2015
- No. 18:** Kumar, V et al., eds. Robbins and Cotran, Pathologic Basis of Disease, 9th edition, 2015
- No. 19:** Love S et al, eds. Neuropathology a Reference text of CNS Pathology, 3rd edition, 2013
- No. 20:** Love S et al. eds. Greenfield's Neuropathology, 9th edition, 2015
- No. 21:** Pelletier, MR et al (1999) Seizure-Induced Cell Death Produced by Repeated Tetanic Stimulation In Vitro
- No. 22:** Read, et al. (2021) ECT-Dangerous on Either Side of the Pond
- No. 23:** Regulatory Update to Thymatron System IV Instruction Manual, 2018
- No. 24:** Spitz and Fisher's (1972) Medicolegal Investigation of Death
- No. 25:** Textbook of Traumatic Brain Injury
- No. 26:** Zarubenko, et al., (2004) Electroconvulsive Shock Induces Neuron Death in the Mouse Hippocampus

Respectfully submitted,

**WISNER BAUM, LLP**

Dated: May 15, 2023

/s/ Bijan Esfandiari

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**CERTIFICATE OF SERVICE**

I, Bijan Esfandiari, hereby certify that on this date, May 15, 2023, the foregoing was filed electronically via the Court's CM/ECF system, to be served on all counsel of record by operation of the Court's electronic filing system.

/s/ Bijan Esfandiari

Bijan Esfandiari