



IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

STATE OF ALABAMA)	
)	
Plaintiff)	
)	
vs.)	Case No.
)	
TERRY GREER)	CC-2013-002134.00
)	CC-2013-002135.00
Defendant)	

AFFIDAVIT IN SUPPORT OF DEFENDANT'S MOTION FOR INPATIENT EXAMINATION, EVALUATION AND TREATMENT

STATE OF ALABAMA
SHELBY COUNTY

Before me, the undersigned, personally appeared, Henry E. Lagman, under oath, deposes and says:

I am Henry E. Lagman, the attorney of the Defendant, Terry Lee Greer. The defendant has been under the care of numerous physicians for head trauma, depression, and psychotic episodes. He has been treated at the University of Alabama in Birmingham and at Spain Rehabilitation, and at Brookwood Hospital's Psychiatric Unit. His medical records reflect the following: He suffered a car accident in October, 2012 at the Hwy280 exit to 8th Avenue South in Birmingham. While hospitalized he received a heart stent procedure. After discharge he began treatment for depression with psychotropic drugs. This treatment was under a doctor's care. In November, 2012 he fell from an eighteen (18) foot deck at his home where paramedics were called. In December, 2012. He was hospitalized at Brookwood Hospital's Psychiatric Unit for suicidal thoughts. His treatment with psychotropic drugs has continued since that time.

The present charges were brought in January, 2013. At the time he had attempted to take his life by stabbing himself seventeen times. He was treated at UAB Hospital, and Spain Rehabilitation before being incarcerated in the Jefferson County Jail on these present charges.

Physicians at the University of Alabama in Birmingham at Spain Rehabilitation Center have ordered him to received continued psychotropic drugs and psychiatric counseling. His depression has been sometimes deep and continuing. It remains untreated. Though he is receiving his psychotropic medications he is not receiving psychiatric counseling as ordered by the various physicians.

The psychotropic drugs upon which he has been placed for his depression does and continues to place him as a fall risk. He has fallen prior to these charges being filed against him. These falls have resulted in head trauma. Terry Greer continues to fall even while in the custody of the Jefferson County Sheriff. Most recently during his continued incarceration he has fallen and was treated and released at UAB Hospital. He was transported pursuant to orders of transport

issued by jail personnel in a Jefferson County Sheriff's squad car. This is a part of his medical treatment record at the Jefferson County Jail.

I have spoken with members of the defendant's family. They inform me that the defendant has a history of brain trauma, depression and health problems which has caused him to be hospitalized in the recent past.

The County Conservator has been appointed over Terry Greer's affairs in the Probate Court of Jefferson County, In The Matter Of Terry Lee Greer, CASE NO. 217753. I have spoken with the Jefferson County Conservator, Sidney Sumney, who informs me that Terry Greer qualifies for medical coverage and that as his conservator, Sidney Sumney, has secured the same.

Counsel is relying upon Terry Greer's medical record, and his personal knowledge in making this affidavit. The undersigned is aware that the Defendant's medical records at four separate medical facilities reflect that he has been hospitalized in the past for brain trauma, depression, heart and psychiatric problems. His most notable psychiatric stay was at Brookwood Hospital's psychiatric unit in December, 2012. This was prior to the acts alleged in the indictments.

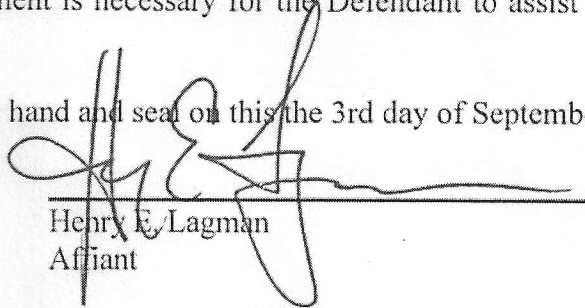
Counsel believes and is informed that the defendant is not presently being given psychiatric counseling at the Jefferson County Jail as ordered by physicians at Spain Rehabilitation at UAB. The Defendant has the right to treatment by doctors of his choice and or other trained mental health professionals at his expense. He has the ability to pay for the same and is covered by medical insurance. Counsel has learned that the facilities at the Jefferson County Jail which have been provided by the County are not clinically conducive to psychiatric counseling and psychological treatment. The conditions are difficult, unworkable, and not in the best interest of the Defendant's recovery.

Psychiatric counseling and treatment is necessary for the recovery of the Defendant.

Psychiatric counseling and treatment has been ordered by his treating physicians prior to incarceration.

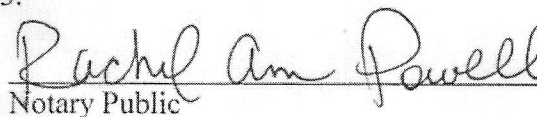
Psychiatric counseling and treatment is necessary for the Defendant to assist counsel in the trial of this matter.

In witness whereof, I have set my hand and seal on this the 3rd day of September, 2013.

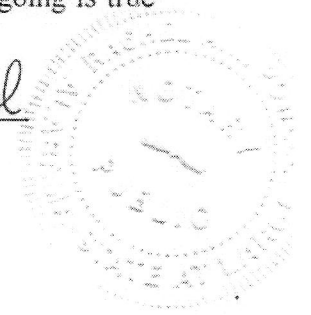

Henry E. Lagman
Affiant

State of Alabama
Shelby County

Before me, the undersigned a Notary Public, for the County and State at Large, who after placing the affiant under oath and the affiant being duly sworn, did state that the foregoing is true and correct this the 3rd day of September, 2013.


Notary Public

RACHEL ANN POWELL
NOTARY PUBLIC
ALABAMA STATE AT LARGE
MY COMMISSION EXPIRES MAY 23, 2016



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have served a copy of the foregoing pleading on counsel for all parties, by the electronic filing system in place in Jefferson County, Alabama this same day the 4rd day of September, 2013.

s/Henry E. Lagman
Henry E. Lagman