

Affidavit

I, the undersigned, Hassan Khalaf , holder of I.D. No. [REDACTED] having been notified that I must tell the truth and nothing but the truth and that if I do not do so, I will be subject to criminal penalties under the law, hereby declare as follows:

1. My name is Hassan Khalaf. I am the General Manager of Al-Shifa hospital. Shifa is the main public hospital in Gaza, located in Gaza City. It contains 585 beds. I make this affidavit to update the court on the functioning of Shifa Hospital and its vulnerability to cuts in supply of electricity.
2. Since Saturday, the 5th of January 2008, we are experiencing a dramatic increase in the hours of electricity cuts due to the severe shortage of industrial diesel which forced the power plant to reduce its electricity production. I understand that attempts are being made to mitigate the impact on the hospital, but when electricity supply is reduced, it is also reduced to the hospital.
3. The power outages cripple our ability to provide medical care.
4. On Saturday, the 5th of January 2008, Shifa Hospital experienced 10-12 hours of electricity outages in total, on an on-and off-basis.
5. On Sunday and Monday, the 6th and 7th January 2008, Shifa Hospital experienced 6-7 hours of electricity outages each day, also on an on-and-off basis.
6. The daily power outages cripple our ability to provide care to our patients. I addressed some of these difficulties in an affidavit I provided to the court on November 26, 2007. I wish to emphasize that

Hassan Khalaf

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the power outages disrupt our ability to provide ordinary medical care and endanger our ability to provide even emergency care. The transitions between power flow and outage are particularly harmful to equipment.

7. The power outages cause malfunctions and breakdowns in medical equipment, computers and other electrical devices necessary for the functioning of the hospital. The breakdowns happen when the electricity supply is cut and then resumed, flooding the machines with a greater capacity than they require, therefore burning the electric wires.
8. This happens quite often with the oxygen station, which needs to be re-operated manually when electricity supply comes back to the hospital. Often, the fuses of the oxygen stations break down, and we need to replace them. In addition, we had to call technicians and repair several times the refrigerators of the morgue in the hospital, which had also broken down because of the fluctuations in power supply.
9. On Saturday, the 5th of January 2008, at 7:15 in the morning, due to the on and off electricity outages, the pump of the water well which supplies water to the Shifa hospital broke down after electric power resumed following a power outage. The water well started operating again only at around 16:00.
10. During that time we could not clean the hospital, wash linens or operate the sterilization system.
11. Our reserve water tank can store only 40,000 liters of water. We immediately gave an order to the cleaning teams of the hospital not to clean the hospital till further notice, in order to use the water only for

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emergency cases such as supplying water for the dialysis machines and for purification of water.

12. Because we ran out of water, we had to stop the operation of the washing machines in the hospital. We could not wash our daily laundry and had difficulty providing clean sheets to patients. Shifa hospital is a big hospital, and paralyzing the washing machines has significant effects on the care we provide to patients, especially in terms of hygiene and sanitation.

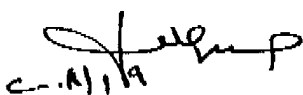
13. Shifa's washing machine system also serves additional, smaller hospitals and clinics in the area.

14. In addition, the operation of the sterilization system in the hospital is dependent on the operation of the washing machines, since the sterilization system is powered by steam from the washing machines room. Therefore, we had to stop also the sterilization system in the hospital, which is indispensable for the proper functioning of the operation rooms.

15. During that same day, even though we had halted part of the hospital's operations, we exhausted the reserve water tank and urgently asked the Gaza City Municipality to provide us with water to re-fill our tanks.

16. Another example, also from Saturday, the 5th of January 2008, is that the wires of the heart ECHO machine were burned when the electricity supply was resumed after a power outage. The machine stopped functioning, and its parts had to be replaced.

17. These are just two examples of the way in which the power outages disrupt the functioning of the hospital. The longer and more frequent the power outages, the greater the damage.


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18. It is important to mention, that on Monday and Tuesday, the 7th and 8th of January 2008, there is a public holiday in Gaza, therefore the hospital is working in approximately 25% less load than usual. Because of the holiday, we hold only emergency operations and check ups. We anticipate further disruptions once demand for hospital services returns to full capacity.

19.16. I declare that this is my name, this is my signature, and that the content of the affidavit, which I have signed, is true.

I certify that on January 9, 2008, Hassan Khalaf, holder of ID # [REDACTED], appeared before me, and after I put him on notice that he must tell the truth and nothing but the truth and that if he does not do so, he will be subject to criminal penalties under the law, he affirmed the truth of this statement above and signed it in my presence.

Attorney Signature

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