

Declaration of Michael Minev, M.D.

DECLARATION OF MICHEAL MINEV, MD.

1. I, Michael Minev, M.D., have personal knowledge of, and am competent to testify, regarding the matters stated in this Declaration, save for those matters asserted on information and belief, and for those matters, I am informed and believe them to be true.

2. I am currently employed by the Nevada Department of Corrections ("NDOC") as its Medical Director. I have served as the Medical Director of the NDOC since October 1, 2018.

3. In connection with the filing of this Declaration, I was contacted by the Office of the Attorney General, which upon information and belief, represents the Defendants in the matter entitled *In re HCV Prison Litigation.*, currently pending in the United States District Court, District of Nevada as case number 3:19-cv-00577-MMD-CLB. It was requested that I provide truthful and accurate information in support of a Status Report that Defendants filed with the Court and for other proper purposes.

4. As Medical Director I am aware of the duties of the employees within the Nevada Department of Corrections.

5. My staff has researched the reason for the discrepancy between the initial positive HCV cases and the current working number of positive HCV inmates.

6. The early number reported to Plaintiff's counsel and the Court was based upon an initial screening test for HCV within the inmate population.

7. That positive number was based upon those that were tested and had an HCV positive antibody test. However, those with antibodies are not necessarily HCV positive. Instead, a positive antibody test indicates that a further laboratory confirmation test is necessary.

8. In examining the data, it was determined that there are currently 1414 inmates with HCV positive antibodies, but only 745 of them have a viral load.

9. The difference between the numbers reported in March of 2020 of inmates believed to have HCV dropped drastically once laboratory confirmation tests were completed to check for an HCV viral load, rather than HCV antibodies.

10. All inmates with a viral load have or will be treated appropriately.

11. Patients with a previous exposure, who were previously treated or whose body naturally

1 healed from a viral infection, may continue to test positive on an antibody test, without a current, active
2 infection. Therefore, there would be no need to treat this patient with direct acting antiviral medication.

3 Pursuant to Title 28, United States Code, Section 1746, I declare under penalty of perjury that
4 the foregoing is true and correct to the best of my knowledge and belief.

5 DATED this 1st day of July, 2021.

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