

STATE OF WISCONSIN : CIRCUIT COURT : MANITOWOC COUNTY

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STATE OF WISCONSIN,	)	
	)	
Plaintiff,	)	
	)	Case No. 05-CF-381
v.	)	
	)	Honorable Judge Angela Sutkiewicz,
STEVEN A. AVERY,	)	Judge Presiding
	)	
Defendant.	)	

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AFFIDAVIT OF LARRY BLUM, MD

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Now comes your affiant, Larry Blum, MD, and under oath hereby states as follows:

1. I am of legal majority and can truthfully and competently testify to the matters contained herein based upon my personal knowledge. The factual statements herein are true and correct to the best of my knowledge, information, and belief. I am of sound mind and I am not taking any medication nor have I ingested any alcohol that would impair my memory of the facts stated in this affidavit.
2. I am a board certified forensic pathologist, clinical pathologist, and anatomic pathologist. I have performed thousands of autopsies and have been qualified as an expert in forensic pathology in hundreds of criminal trials. A copy of my CV is attached and incorporated as Exhibit A to this affidavit.
3. In my capacity as a forensic pathologist, I am asked to interpret injury patterns to determine whether the theory of a crime is consistent with the injuries observed during the autopsy of the victim and on the suspect. To that end, I am able to determine with a high level of accuracy how and when injuries were inflicted, e.g., what instrument caused



STATE OF WISCONSIN : CIRCUIT COURT : SHEBOYGAN COUNTY

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Now comes your affiant, Larry Blum, MD, and under oath hereby states as follows:

1. I am of legal majority and can truthfully and competently testify to the matters contained herein based upon my personal knowledge. The factual statements herein are true and correct to the best of my knowledge, information, and belief. I am of sound mind and I am not taking any medication nor have I ingested any alcohol that would impair my memory of the facts stated in this affidavit.
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3. In my capacity as a forensic pathologist, I am asked to interpret injury patterns to determine whether the theory of a crime is consistent with the injuries observed during the autopsy of the victim and on the suspect. To that end, I am able to determine with a high level of accuracy how and when injuries were inflicted, e.g., what instrument caused



an injury, the relative positions of the victim and attacker at the time of injury, and how long it has been since an injury was inflicted based upon how much it has healed.

4. I have reviewed photographs of Ryan Hillegas' ("Mr. Hillegas") hands taken on the morning of November 5, 2005, attached and incorporated herein as Group Exhibit B to this affidavit. I have also reviewed a photograph of Teresa Halbach ("Ms. Halbach") Ms. Halbach that shows her fingernails, attached and incorporated herein as Exhibit C to this affidavit. From that photograph, I observed that Ms. Halbach's fingernails extended approximately 2-3 mm past her fingertips.
5. It is my opinion, to a reasonable degree of scientific certainty in the field of forensic pathology, that Mr. Hillegas' right hand, as observed in Group Exhibit B, appears discolored. It is my opinion that this discoloration may indicate a contusion or bruise on Mr. Hillegas's right hand.
6. It is my opinion, to a reasonable degree of scientific certainty in the field of forensic pathology, that there were abrasions on Mr. Hillegas' left hand at the time when the photographs were taken. Specifically, I observed three abrasions on the back of Mr. Hillegas' left hand that I would characterize as being linear, i.e., all three abrasions appear straight. Further, all three abrasions appear to be parallel to one another. The abrasions appear staggered. All three abrasions are vertically oriented.
7. It is my opinion, to a reasonable degree of scientific certainty in the field of forensic pathology, that the abrasions I observed on the back of Mr. Hillegas' left hand are consistent with scratches inflicted by fingernails. Based upon my experience performing autopsies and interpreting injury patterns on suspects, scratches inflicted by fingernails

can occur when an attacker manually strangles or throttles or attempts to manually strangle or throttle a victim and the victim, acting in defense, attempts to force the attacker to release his grip by scratching his hands. It is my opinion, to a reasonable degree of scientific certainty in the field of forensic pathology, that Ms. Halbach's fingernails were of sufficient length to inflict the abrasions observed on the back of Mr. Hillegas' left hand.

8. It is my opinion, to a reasonable degree of scientific certainty in the field of forensic pathology, that the abrasions I observed in Group Exhibit B are consistent with blunt force injury. That is, they are not consistent with injuries inflicted by a sharp instrument, like a knife. I would characterize abrasions inflicted by fingernails as blunt force injuries.
9. It is my opinion, to a reasonable degree of scientific certainty in the field of forensic pathology, that abrasions inflicted by fingernails may take up to and longer than one week to heal, depending upon the depths of the abrasions.
10. On May 2, 2017, I observed and directed a reenactment of an attack scenario. The purpose of this reenactment was to determine if the injury pattern I observed on the back of Mr. Hillegas' left hand in photographs is consistent with the theory that fingernail scratches were inflicted on Mr. Hillegas during his manual strangulation or throttling of Ms. Halbach. Two volunteers from Kathleen T. Zellner & Associates, P.C., played the parts of victim and attacker. The volunteer playing the victim covered the fingertips of her right hand with red body paint. The purpose of the body paint was to simulate the scratches inflicted by her fingernails on the hand of the attacker and to record and observe the injury patterns created by her fingernails. The attacker approached the victim from

behind and placed his left hand around the victim's neck. The victim then used her right hand to scratch the attacker's left hand. I observed the volunteers reenact this scenario multiple times. Each time, I observed an injury pattern that closely resembled the injury pattern I observed on Mr. Hillegas' left hand in Group Exhibit B.

11. To a reasonable degree of scientific certainty in the field of forensic pathology, it is my opinion that the injury pattern I observed on Mr. Hillegas' left hand in Group Exhibit B, is consistent with the theory demonstrated in the above described experiment. Specifically, the injury pattern I observed on Mr. Hillegas' left hand is consistent with abrasions inflicted by fingernails while Mr. Hillegas was standing behind and manually strangling or throttling another person. As stated above, it is my opinion that Ms. Halbach's fingernails, as observed in Exhibit C were of sufficient length to inflict the injuries I observed on Mr. Hillegas' left hand in Group Exhibit B.
12. On December 1, 2016, I was present at Ms. Zellner's law office, where I observed fresh blood, collected from a volunteer, being dripped into a sink. It is my understanding that this sink was in the bathroom of Steven Avery's trailer in October and November 2005 and had been removed and transported to Ms. Zellner's law office. I observed the fresh blood coagulate and dry. The fresh blood began to dry and coagulate approximately 15 minutes after it was deposited in the sink. At that time, I observed blood flakes begin to form in the sink. After approximately 28 minutes, all of the blood was dry.

FURTHER AFFIANT SAYETH NAUGHT

Larry Blum MD  
Larry Blum, MD

Subscribed and sworn before me  
this 3<sup>rd</sup> day of May, 2017.

Kurt W. Kingler  
Notary Public



# Larry W. Blum, M.D.

815-399-1114

6812 Covernook Rd, Rockford, Illinois, 61107

## Education and Medical Training

B.S.	Loras College, Dubuque, Iowa	1966
Medical Technologist Certificate (M.T.)	St. Anthony Hospital, Rockford, Illinois	1973
M.D.	University of Illinois College of Medicine, Rockford, Illinois	May 1976
Residency	Baptist Memorial Hospital, Memphis, Tennessee	1976-1980
Affiliate Resident in Forensic Pathology	Shelby County M.E. Office, Memphis, Tennessee	January 1979 - March 1979
Chief Resident	Baptist Memorial Hospital, Memphis, Tennessee	January 1980 - June 1980

## Licensure and Certifications

- Licensed in Illinois July 1980
- American Board of Pathology: Anatomic 1981
- American Board of Pathology: Clinical 1981
- American Board of Pathology: Forensic 1985

## Current Activities

Coroner's Physician, Boone Co. Illinois

Forensic Pathologist Consultant

Qualified as an expert in over 500 cases, 95% for the prosecution for criminal cases.

## Academic

Clinical Assistant Professor at Rockford branch of *University of Illinois Medical School* in area of Forensic Pathology and Neuropathology, (Retired 08/01/2015)

