

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
WEST PALM BEACH DIVISION

AWILDA MARIE MOORE and  
GERRICK D. MOORE, her husband

CASE NO.:

Plaintiff,

vs.

STRYKER CORPORATION, STRYKER  
SALES CORPORATION, BREG, INC.,  
I-FLOW CORPORATION, McKINLEY  
MEDICAL, LLC., MOOG, INC., CURLIN  
MEDICAL, INC., DJO, LLC, f/k/a DJ  
ORTHOPEDICS, INC.,

Defendants.

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**DECLARATION OF FRANCIS M. McDONALD, JR.**

BEFORE ME, the undersigned authority, personally appeared Francis M. McDonald, Jr., who, after being duly sworn, deposes and states as follows:

1. My name is Francis M. McDonald, Jr., and I am over the age of 18 years, of sound mind, and have personal knowledge of the facts set forth herein.

2. I am generally familiar with the claims being made by the Plaintiff in this case, having previously been supplied with various medical reports and bills, and other information pertaining to Ms. Moore, by her counsel.

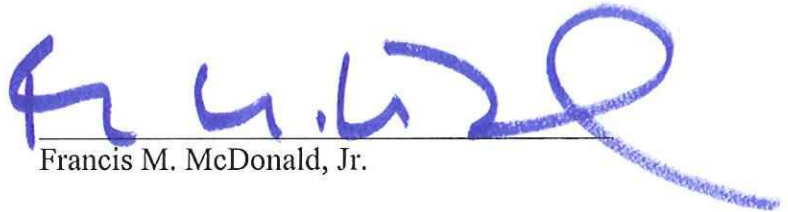
3. On behalf of the Stryker Defendants listed above, I have met with and have exchanged electronic messages with Ms. Moore's counsel in which he has provided a demand for settlement of Ms. Moore's case. The demand was for over twenty times the



jurisdictional limit (\$75,000.00) of this Court.

4. Based upon my review of the aforementioned documentation, my discussions with Ms. Moore's counsel, the aforementioned settlement demand conveyed via electronic message, as well as my experience with similar cases involving similar claims, it is my educated belief that Plaintiffs seek damages in this case well in excess of \$75,000.00, the amount required for diversity jurisdiction in this court.

FURTHER AFFIANT SAYETH NOT.



Francis M. McDonald, Jr.

STATE OF FLORIDA  
COUNTY OF ORANGE

Sworn to and subscribed before me this 13th day of September, 2011, by Francis M. McDonald, Jr., who is personally known to me.



Notary Public

Printed Name:

Commission No.:

Commission Expires:

