

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MINNESOTA**

In re: GUIDANT CORP. IMPLANTABLE  
DEFIBRILLATORS PRODUCTS  
LIABILITY LITIGATION

MDL No. 05-1708 (DWF/AJB)

This Document Relates to:

## AFFIDAVIT OF RONALD S. GOLDSER

### Cases Listed on the Attached Exhibit A

[illegible]

Ronald S. Goldser, being first duly sworn on oath, hereby deposes and says:

That I am an attorney licensed to practice before this Court, and am a partner at Zimmerman Reed. I make this Affidavit in Support of Plaintiffs' Motion to Compel Defendant Fact Sheets in the above litigation.

Attached hereto as Exhibit A is a list of all Plaintiffs have Defendant Fact Sheets (“DFS”) owing.

Attached hereto as Exhibit B is the Court's August 1, 2006 Order.

Attached hereto as Exhibit C is a copy of the Defendant Guidant Case Profile Form (“DFS”).

Attached hereto as Exhibit D is the November 3, 2006 correspondence sent to Defendants outlining delinquent DFS'.

Attached hereto as Exhibit E is Defendants November 3, 2006 e-mail and November 6, 2006 correspondence requesting time to review and respond to Plaintiffs November 3, 2006 correspondence.

Attached hereto as Exhibit F is the November 22, 2006 e-mail from Ronald S. Goldser to Andrew Carpenter.

FURTHER YOUR AFFIANT SAYETH NOT.

Dated: December 6, 2006

s/Ronald S. Goldser  
Ronald S. Goldser

Subscribed and sworn to before me  
this 6th day of December, 2006.

s/Tina M. Olson  
Notary Public