

EXHIBIT D

GUIDANT PRODUCTS LITIGATION MDL NO. 1708

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November 3, 2006

Timothy Pratt
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2555 Grand Boulevard
Kansas City, MO 64108-2613

Andrew D. Carpenter
Shook Hardy & Bacon, LLP
2555 Grand Boulevard
Kansas City, MO 64108-2613

Re: *In Re: Guidant Corp. Implantable Defibrillators Products Liability Litigation*, MDL 1708

Dear Mr. Pratt and Mr. Carpenter:

We are in receipt of your first production of Defendant Fact Sheets ("DFS"). Our records reflect, however, that DFS' are also due for the following individuals:

Abrams, Craig	06-CV-2129
Alcorn, William	06-CV-1376
Alexander, Thomas	06-CV-1522
Alexson, Pamela	
Allen, Alphonzo	
Allen, Eugene	06-CV-2274
Allen, James	
Allenback, Trisha	
Anderson, Irene	06-CV-568
Atchison, David	05-CV-1322
Aughenbaugh, Ernest	
Aydelott, Dorothy	06-CV-1291
Bailey, Bonnie	06-CV-304
Barnes, Brenda	06-CV-2445
Baughman, Joseph	
Bazole, Mary	
Beaune, Doree	06-CV-90
Becerra, Mary Ann	06-CV-300
Becker, Louis	06-CV-2170

Berry, Edward	06-CV-1407
Bhuller, Jagir	06-CV-1566
Black, Alan	
Blackburn, Robert	06-CV-2169
Bohannon, Willie	06-CV-1196
Bowles, Chyleta	06-CV-244
Bradshaw, Alan	
Brewster, Christopher	
Brockwell, Arvel	06-CV-453
Brown, Fred	06-CV-650
Brown, Barbara	
Brown, Raymond	06-CV-1998
Brown, Jr., Joseph	
Buckland, Paul	06-CV-90
Bultena, Lisa	
Burden, Bonnie	06-CV-2442
Burmeister, Kurt	06-CV-78
Cairns, Harriet	06-CV-1524
Caldera, Maxine	
Carnes, Michael	
Cipolla, Christopher	
Clark, Johnny	06-CV-60
Clark, Pearl	06-CV-245
Clarke, John	06-CV-1459
Clevenger, Terry	06-CV-306
Cline, James	
Cohen, Herb	
Cohen, Theodore	
Collins, Jimmy	06-CV-200
Commander, Charles	06-CV-246
Cooper, Francis	06-CV-90
Cross, Francis	06-CV-2208
Cummings, Marisa	
Datcher, Sharon	06-CV-25
Davis, Barney	06-CV-299
Daye, Linda	06-CV-398
Defiore, Michael	
Deweese, Marianna	06-CV-2442
Dicine, Joseph	06-CV-247
Diehl, Richard	06-CV-399
Dillard, Kimberly	06-CV-395
DuBoce, Bill	
Dusch, Gary	
Edmunds, Sharon	06-CV-1409
Ellis, Joseph	06-CV-677
Enich, George	06-CV-849
Eskine, Sr., James	
Ettinger, Sheila	05-CV-3279
Eylers, Janet	
Fausher, Marianne	06-CV-305

Fletcher, Douglas	06-CV-44
Flores, Leonides	06-CV-2390
Foley, Patrick	06-CV-2386
Folly, Roger-Guy	06-CV-1566
Fox, Dale	05-CV-1570
Franklin, Jerry	
Funston, Carmel	05-CV-3160
Furtado, Lorraine	05-CV-3160
Gabriele, Joseph	05-CV-487
Gardner, Jaycee	06-CV-1566
Garrison, Linda (Bernard)	06-CV-73
Gaulmon, Virgie	06-CV-2384
Gillick, Frederick	06-CV-248
Gillis, David	06-CV-249
Godfrey, Johnie	06-CV-2698
Gower, Frederick	
Gray, Sylvania	06-CV-1406
Greenberg, Stanley	06-CV-393
Grosse, Henrietta	
Gurton, Spencer	06-CV-2442
Haley, Harold	
Hall, Ken	06-CV-298
Hall, Vernia	
Hansen, Kirk	06-CV-2157
Hargrove, Thomas	06-CV-2442
Hartsfield, Clara	06-CV-2697
Holland, Gary	06-CV-1523
Huffman, David	06-CV-90
Hupalo, Roman	06-CV-2394
Ivens, Tamela	05-CV-1491
Jackson, Janice	06-CV-159
Jacobson, George	06-CV-1756
James, Larry	06-CV-1201
Jenkins, Michael	06-CV-1489
Joffe, Jay	06-CV-1521
Johnson, Etlar	06-CV-2395
Kalpin, Jennifer	06-CV-1166
Kasanova, Kenneth	05-CV-4044
Kesti, Rodney	06-CV-1588
Ketover, Chester	06-CV-302
King, Debra	06-CV-1999
Kyle, Robert	
Larson, Connie	05-CV-2656
Lee, Esther	06-CV-1411
Legendre, John	
Lerch, Richard	06-CV-201
Leslie, Richard	06-CV-1047
Lewis, Howard	06-CV-2172
Lewis, Zina	
Lindemann, Dennis	06-CV-250

Lindsey, Milton	06-CV-2608
Little, Barbara	06-CV-99
Loft, Bentley	06-CV-2444
Lowry, Cindy	06-CV-55
Martin, Dale	06-CV-1167
Martin, Russell	06-CV-392
Martinenas, Edmund	06-CV-90
Mayem, Leonard	
McGaughran, Francis	
McLaughlin, Timothy	06-CV-1182
McMillan, Jody	06-CV-2214
Messick, Emmett	06-CV-48
Metz, Susan	06-CV-390
Miceli, Anthony	
Miller, Martin	06-CV-389
Morman, Otto	05-CV-1153
Morrison, Larry	06-CV-2158
Munson, Darci	
Nelson, Hazel	06-CV-2075
Newman, Jr., Floyd	06-CV-56
Nichols, Blaik	06-CV-394
O'Brien, Lenore	06-CV-1819
Oien, Matthew	06-CV-1565
Orr, David	
Oxendine, Aulton	06-CV-303
Paden, Vicki	06-CV-90
Page, Thomas	05-CV-3160
Paxton, Edward	06-CV-682
Payne, Robert	06-CV-2212
Pealy, Ted	06-CV-2531
Perkins, Stanley	06-CV-397
Perry, James	06-CV-301
Picken, Ronald	05-CV-1769
Piwok, James	06-CV-1488
Pollak, George	06-CV-1047
Portmann, James	
Powell, Gary	06-CV-2445
Ramirez-Santiago, Carlos	
Ramsaran, Sahu	06-CV-1566
Reams, Douglas	06-CV-1476
Rebone, Richard	05-CV-379
Roberts, David	06-CV-679
Robertson, Edward	05-CV-1769
Robinson, John	06-CV-624
Rooker, Jack	06-CV-251
Rosenthal, Ronald	06-CV-1405
Ruggiero, Paul	06-CV-2201
Rusen, Theodore	06-CV-101
Russell, Lettye	06-CV-200
Salas-Aguilar, Sylvia	06-CV-297

Sauerwine, Bruce	06-CV-1058
Schulsinger, Wolf (Bill)	
Scott, Annette	06-CV-26
Scott, Travis	
Shorter, James	06-CV-252
Simon, Fred	06-CV-57
Singh, Saraswati	
Sizemore, Kenneth	06-CV-2001
Smith, Paul	06-CV-1237
Smith, Ronald	
Spruill, Charles	05-CV-379
Steele, Sylvester	06-CV-253
Steele, William	06-CV-2213
Strickling, James	
Sugg, Greg	06-CV-2445
Tankersley, William	06-CV-396
Terry, Jr., Jerome	
Thacker, Clinton	06-CV-1047
Thames, Clayrea	06-CV-2444
Tisdon, Carl	
Torricelli, Donna	06-CV-254
Turner, Donovan	06-CV-683
Turner, Wade	06-CV-2389
Turpin, Wayne	06-CV-391
Tyler, Samuel	06-CV-2421
Urich, Oren	06-CV-27
Vanover, Ernest	06-CV-2002
Vazquez, Scott	06-CV-1168
Venditto, Eugene	06-CV-1487
Vitelli, Helene	06-CV-2442
Walker, Edith	
Watts, Johnny	
Wavrock, Nancy	06-CV-2200
Webb, Stacy	
Weldon, Thomas	06-CV-1520
Wenig, Larry	05-CV-2598
Wentworth, Roger	06-CV-2442
Westcott, III, Redge	06-CV-46
Williams, Marvin	06-CV-307
Wilson, David	06-CV-1996
Zillendor, Mary	
Zink, Clara	06-CV-90
Zurek, Thomas	

Please advise as soon as possible when we can expect to receive these DFS.

Andrew D. Carpenter
November 3, 2006
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Very truly yours,

ZIMMERMAN REED, PLLP

/s Charles S. Zimmerman

Charles S. Zimmerman

LIEFF, CABRASER, HEIMANN
& BERNSTEIN, LLP

/s Elizabeth J. Cabraser

Elizabeth J. Cabraser

CSZ/tmo
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/s Richard J. Arsenault

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/s Seth Lesser

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