

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: GUIDANT CORP.
IMPLANTABLE DEFIBRILLATORS
PRODUCTS LIABILITY LITIGATION

MDL No. 05-1708 (DWF/AJB)

This pleading relates to:

Case No. 06-CV-05077 (DWF/AJB)

PEARL M. RUSSO,

Plaintiff,

**AFFIDAVIT OF TIMOTHY A.
PRATT IN SUPPORT OF AMENDED
NOTICE OF REMOVAL**

vs.

GUIDANT CORPORATION;
GUIDANT SALES CORPORATION;
CARDIAC PACEMAKERS, INC.;
BOSTON SCIENTIFIC
CORPORATION; ST. JOSEPH
HOSPITAL OF ORANGE; and DOES 1
through 100, inclusive,

Defendants.

STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

I, Timothy A. Pratt, being duly sworn under oath hereby state:

1. I make this affidavit upon my own personal knowledge.
2. The Exhibits attached hereto and offered in support of Defendants’

Amended Notice of Removal are true and correct copies of the following:

- Exhibit A – Notice of Removal;
- Exhibit B – Complaint for Damages;
- Exhibit C – Notice of Voluntary Dismissal;
- Exhibit D – Order for Voluntary Dismissal.

This concludes my affidavit.

Date: March 6, 2007

/s/ Timothy A. Pratt
Timothy A. Pratt