

EXHIBIT E

AFFIDAVIT OF RONALD W. DOLLENS

BEFORE ME, the undersigned authority, on this day personally appeared Ronald W. Dolleens, who, after being duly sworn, deposed and stated on his oath as follows:

1. My name is RONALD W. DOLLENS. I am over the age of eighteen years, have never been convicted of a felony, am fully competent to make this affidavit, and have personal knowledge of the statements made herein, which are true and correct.
2. Until November 2005, I served as President and Chief Executive Officer of Guidant Corporation ("Guidant"). I began working at Guidant in 1994.
3. Guidant Corporation, which is headquartered in Indianapolis, is the parent corporation of Cardiac Pacemakers Inc., headquartered in Minnesota. I did not maintain an office in Minnesota. In fact, CPI has its own President and Chief Executive Officer.
4. I did not participate in any quality control system decisions related to the Ventak Prizm 2 DR, Model 1861, or in the assessment or review of any Trend relating to the Ventak Prizm 2 DR, Model 1861, during the years 2001-2004.
5. I have no unique or superior personal knowledge of allegations made by any plaintiff as a result of the implantation of a Ventak Prizm 2 DR Model 1861 defibrillator, nor of complaints following implantation.
6. Further, I have no unique or superior personal knowledge of plaintiffs, their medical conditions, or the facts regarding the implantation of their CPI devices.

Further, Affiant sayeth not.

Ronald W. Dollans
Ronald W. Dollans

SUBSCRIBED AND SWORN TO BEFORE ME this 14th day of
January, 2006, to certify which witness my hand and official seal.



Notary Public in Marion County, State of Indiana. My commission
expires 2-1-07.

Nancy C Garcia

NANCY C. GARCIA
Notary Public, State of Indiana
County of Marion
My Commission Expires 02/01/2007