

EXHIBIT C

From: Carpenter, Andrew (SHB) [mailto:ACARPENTER@shb.com]
Sent: Friday, April 13, 2007 4:04 PM
To: Strikis, Silvija A.; Moeller, Deborah A. (SHB)
Cc: Lesser, Seth; Fleishman, Wendy; rsg@zimmreed.com; Jennings & Drakulich, LLP; rjmobile@nbalawfirm.com; HShkolnik@Rheingoldlaw.com
Subject: RE: GDT - Discovery Call

I'm am unfortunately tied up today in hearings. Let's shoot for Monday.

With respect to the Higgins-related discovery, we think our objections are well-taken, and will stand on them.

With respect to pending document production issues, please see the attached correspondence.

With respect to the RET and TRAC databases, tell us which fields you think are relevant and we'll consider your request. The current demand is overbroad, and you have all the fields listed out for you to choose amongst.

With respect to BSC, we are still assessing what exists in terms of responsive materials uniquely in the possession of BSC. We would like to have more definite information Monday.

Send Deb an e mail about Ellenbogen. I have no information to offer on that subject.

I do not believe any of these issues to be suitable for expedited letter briefing, especially in light of the Court's reaction to your raising the BSC issue last week.
But I leave that to you.

Have a good weekend.

ADC

From: Strikis, Silvija A. [mailto:sstrikis@khhte.com]
Sent: Friday, April 13, 2007 10:57 AM
To: Carpenter, Andrew (SHB); Moeller, Deborah A. (SHB)
Cc: Lesser, Seth; Fleishman, Wendy; rsg@zimmreed.com; Jennings & Drakulich, LLP; rjmobile@nbalawfirm.com; HShkolnik@Rheingoldlaw.com
Subject: GDT - Discovery Call

Andy,

In our call on Tuesday, 4/10, you said that you would get back to us whether we could have a call today. We have since then asked again whether we could have a call today, and have received no response. We would appreciate knowing whether you can have a call today -- and if not, have a proposal from you for an alternative

05/03/2007

time that would work.

To refresh what we need to speak about, we need to continue going over defendants' objections to interrogatories (the set that came from the RFAs and the Higgins-related interrogatories). We would like to ascertain whether some of the objections can be resolved.

Also, we would like an update on the Boston Scientific production. On 4/10, you said that Boston Scientific would be producing something, but our understanding was that you were going to check what that information was and when it would be produced. As our prior communications with defendants from months ago suggested that Boston Scientific had already segregated documents for production, we trust that production will not be a lengthy process.

We would also appreciate responses to the pending items from the prior correspondence regarding pending discovery items, such as Fred Reports (including items that were to be produced according to defendants' 2/28/07 response to our 9/06 letter items; and the status of requests plaintiffs made on 2/14/07).

Plaintiffs also would like to know whether a complete electronic version of responsive information from the RET and TRAC systems can be extracted. It seems from the general production (such as discrete reports attached to emails that have been produced) that information can be selected and formatted from these systems for purposes of generating electronic reports. On 4/10, and previously, you indicated that you were going to discuss this issue with Arlen Tanner of your office.

We would like to have the above issues resolved promptly, so that we can avoid having to seek the Court's intervention in such matters by letter brief next week.

There are other discovery issues as well that we would like to discuss, including whether Dr. Ellenbogen's deposition could be scheduled for around May 7 or 8.

Please let us know when you would be available for a call.

Thank you.

Silvija

Mail Gate made the following annotations on Fri Apr 13 2007 15:05:33

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05/03/2007