EXHIBIT G

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

Dear Counsel:

Please consider this a follow-up to my letters of February 28, 2007 and March 13, 2007 and a response to recent inquiries from you regarding the status of production of certain documents. As indicated in my previous letter, several of the requests in your recent letters reiterate requests made in your September 20, 2006 letter, which letter was the subject of a detailed exchange of correspondence and lengthy discussions in September and October. We continue to think that it is not necessary nor efficient to revisit each of those requests in detail. Nonetheless, my client remains committed to identifying and producing responsive documents in an orderly and timely manner as evidenced by our production of more than 13 million pages in this litigation to date.

While we will be in a position to produce a number of your specifically requested documents within the next ten days to two weeks, the collection, review, and production of responsive documents from other requested categories may require additional time. The following are responses to and updates regarding several of your requests.

- *Lab Notebook IRE-083* – we expect to produce this within the next ten days to two weeks.

- *Peer Review of February 28, 2006 Update of TR 02019* – we expect to produce this within the next ten days to two weeks.

- *Health Risks Assessment Rev. E* – we expect to produce this within the next ten days to two weeks.

- *Prizm 2 Aging Test Update* - we expect to produce this within the next ten days to two weeks.

- *2005 and 2006 Annual Reports for devices other than Ventak AV/VR* - we expect to produce this within the next ten days to two weeks.

- *Revision 2 of SAN 9674* - we expect to produce this within the next ten days to two weeks.

- *Trend Report for TR00002* – we will review this trend report and , if it appears relevant to the issues in this litigation, we will plan to produce it within the next ten days to two weeks.

- *Lab Notebook 1821* - we expect to produce this within the next ten (10) days to two weeks.

- *Bryan Johnson's Lab Notebook regarding notes from 2002 header test* - we are in the process of collecting this document and will produce it if it is relevant.

- *Lab Notebooks IRE-079 and 1657360 and electronic Lab Notebook 2042718* – we are in the process of collecting these documents and will produce those that are relevant.

- *Documents related to the analysis of returned products* – we gave gathered and expect to produce within the next three weeks those documents that could be collected electronically that relate to Prizm 2 devices returned as a result of the advisories at issue in this litigation.

- *System Change Requests (SCRs)* – we are attempting to identify, on a priority basis, those SCRs that relate to Trend 02019 for the Prizm 2. To the extent that the identification and collection of such documents is not unduly burdensome, we will review and produce those that are responsive.

- *Documents relating to the biocompatibility of materials referenced in P890061* – our records and investigation indicate that P890061 refers to a PMA for a device

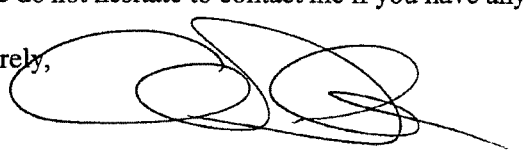
that is not at issue in this litigation and, therefore, this unlimited request appears overbroad and not calculated to yield the discovery of admissible evidence.

- *"Fred Reports"* – these reports appear to relate to spending trends and therefore do not appear to be relevant to the issues in this litigation.

- *"Financial Models" referenced in your February 14, 2007 letter* – we are attempting to identify and collect the referenced "models". To the extent such documents exist, we will review and produce those that are responsive.

Please do not hesitate to contact me if you have any questions.

Sincerely,



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ADC:jcd