

Exhibit D

Issued by the
UNITED STATES DISTRICT COURT
 DISTRICT OF CONNECTICUT

IN RE: GUIDANT CORP. IMPLANTABLE
 DEFIBRILLATORS PRODUCTS LIABILITY
 LITIGATION

SUBPOENA IN A CIVIL CASE

Case Number:¹ 0:05-md-1708 (DWF-AJB)
 (Pending in the District of Minnesota)

TO: Stanwich Group LLC
 c/o Juerg A. Heim
 Ivey, Barnum & O'Mara LLC
 170 Mason Street
 Greenwich, CT 06830

YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME
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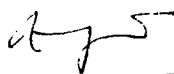
YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): **See Exhibit A**

PLACE: Neal L Moskow Ury & Moskow, LLC 883 Black Rock Turnpike Fairfield, CT 06825	DATE AND TIME July 2, 2007, 9:00 a.m.
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YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below:

PREMISES	DATE AND TIME
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Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)  Attorney for Plaintiffs	DATE 5/30/07
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ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER Richard J. Arsenault Neblett, Beard & Arsenault 2220 Bonaventure Court, P.O. Box 1190 Alexandria, LA 71309-1190 (318) 487-9874
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(See Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), on next page)

¹ If action is pending in district other than district of issuance, state district under case number.

PROOF OF SERVICE

SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		MANNER OF SERVICE
SERVED BY (PRINT NAME)		TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____
DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), as amended on December 1, 2006

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS

(1) A party or so attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection, copying, testing, or sampling of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection, copying, testing, or sampling may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to producing any or all of the designated materials or inspection of the premises or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoenas shall not be entitled to inspect, copy, test, or sample the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production, inspection, copying, testing, or sampling. Such an order to compel shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection, copying, testing, or sampling commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash modify the subpoena if it

- (i) falls to allow reasonable time for compliance;
 - (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held;
 - (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies; or
 - (iv) subjects a person to undue burden
- (B) Ifs subpoena
- (i) requires disclosure of a trade secret or other confidential research, development, or commercial information; or
 - (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party; or
 - (iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect person subject

to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) (A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which the person ordinarily maintains it or in a form or forms that are reasonably usable.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) (A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial-preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information is produced in response to a subpoena that is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, it must take reasonable steps to retrieve it. The person who produced the information must preserve the information until the claim is resolved.

(e) CONTEMPT. Failure of any person without adequate excuse to obey a subpoena served upon that person may be deemed s contempt of the court from which the subpoena issued. An adequate cause for failure to obey exists when a subpoena purports to require a nonparty to attend or produce at a place not within the limits provided by clause (ii) of subparagraph (c)(3)(A).

ATTACHMENT A

Definitions and Instructions

The following definitions and instructions shall be employed in responding to this Subpoena *Duces Tecum* ("Subpoena") request for the production of documents:

A. This Subpoena requires that Stanwich Group LLC produce all responsive documents in the possession, custody, or control of the company or any of its current and former subsidiaries, affiliates, partners, employees, attorneys, agents or other persons acting and purporting to act on its behalf.

B. The term "you" or "yours" refers to Stanwich Group LLC and/or any of its current and former subsidiaries, affiliates, officers, directors, employees, attorneys, agents, and other persons acting or purporting to act on its behalf.

C. The term "Plaintiffs" refers to named and unnamed Plaintiffs or potential class members in the action, *In re Guidant Corp. Implantable Defibrillators Products Liability Litigation*, Civil Action No. 0:05-md-1708 (DWF-AJB), currently pending in the United States District Court for the District of Minnesota.

D. The term "Defendants" refers to Guidant Corporation, Guidant Sales Corporation, Cardiac Pacemakers, Inc., Boston Scientific Corporation and those entities' current and former affiliates, subsidiaries, officers, directors, employees, attorneys, agents, and other persons acting or purporting to act on their behalf.

E. "All" means all or any, and "any" means all or any.

F. "And" or "or" shall be construed either conjunctively or disjunctively to bring within the scope of the request any information that might otherwise be construed to be outside its scope.

G. As used herein, any word written in the singular shall be construed as plural and vice-versa, and any masculine word shall be construed as feminine or neuter and vice-versa as required by the context to bring within the scope of this Subpoena any documents and/or information that might be deemed outside the scope of a request by another construction.

H. "Relating to" means referring to, consisting of, reflecting, concerning, discussing, constituting, describing, analyzing, studying, evidencing, incorporating, or in any way pertaining to or having any logical or factual connection to the subject matter.

I. "Document" has the full extent of its meaning under Rule 34 of the Federal Rules of Civil Procedure. "Documents" include both originals and copies, any and all drafts, and all copies that contain any notation not on the original. Examples of documents include, but are not limited to, handwritten, typed, or printed papers, handwritten notes, office notes, calendar entries, diaries, memoranda, press clippings, photographs, reports, deposition transcripts, deposition exhibits, receipts, invoices, correspondence, ledger entries, work papers, audio and visual recordings, films, and computer printouts, cards, tapes, disks, and other types of electronically or magnetically maintained information.

J. Documents that are in paper form or that constitute other physical objects from which recorded information may be visually read, as well as electronic files, audio or video tapes and similar recordings, should be produced in their original form or in copies that are exact duplicates of the originals. Computer files and similar electronic records should be produced in an electronic or readable form mutually agreed upon by the parties.

K. If you object to any portion of any request in this Subpoena, you should identify the portion to which you object and respond to the remainder.

L. Unless otherwise indicated, this Subpoena includes requests for documents created or that came into your possession between January 1, 2001 and the date of this Subpoena.

M. The scope of this Subpoena includes all responsive documents that are within your custody or control, regardless of whether they are currently in your possession.

N. Documents should be produced either: (a) as they are kept in the ordinary course of business, complete with the original file folders, binders, or other containers in which they are stored (or legible copies of the labels from those folders, binders, or containers); or (b) organized according to the document request(s) in this Subpoena, to which they are responsive. If you elect the latter mode of production, each document or set of documents from a particular file, binder, or other container should be accompanied by a legible copy of the label from that container or some other reliable indicator of the file from which it was taken. If any portion of a document is responsive to any request, the entire document should be produced.

O. If you assert a claim of privilege as to one or more documents sought in this request, you should list, for each such document, the document's date, signatory or signatories, author(s), addressee(s), each other person who received a copy of such document, the subject matter of the document, its location and custodian, and the basis for the claim of privilege, including the identity of any and all clients on whose behalf the privilege is claimed. Such information should be supplied in sufficient detail to permit the Court to assess the applicability of the privilege claimed.

Documents Requested

1. All documents relating to or reflecting communications between you and Defendants that refer, relate or in any way pertain to Defendants' implantable defibrillators or pacemakers. These include, but are not limited to, documents that refer or relate to:

- a. Incidents of specific malfunctions in Defendants' implantable defibrillators or pacemakers;
- b. Defendants' advisories to physicians or the public regarding defects or malfunctions in Defendants' implantable defibrillators or pacemakers;
- c. The United States Food and Drug Administration's ("FDA") recall of Defendants' implantable defibrillators or pacemakers;
- d. Litigation against or investigation of Defendants regarding Defendants' implantable defibrillators or pacemakers;
- e. Litigation against or investigation of Defendants involving allegations that Defendants acted improperly in light of information in their possession regarding Defendants' implantable defibrillators or pacemakers, including but not limited to, litigation or investigations relating to allegations of securities fraud or insider trading;
- f. Press, regulatory, or other inquiries regarding Defendants' implantable defibrillators or pacemakers, including but not limited to, inquiries from Barry Meier of the *New York Times*;

g. Defendants' response to published articles regarding their implantable defibrillators or pacemakers, including but not limited to, articles published in the *New York Times* and the *New England Journal of Medicine*.

h. Requests for your advice regarding Defendants' approach to responding to press, regulatory, or other inquiries regarding Defendants' implantable defibrillators or pacemakers;

i. Advice given by you in relation to press, regulatory, or other inquiries regarding Defendants' implantable defibrillators or pacemakers, including but not limited to, any rebuttals, scripts, or talking points provided by or to you;

j. Research done by you in relation to Defendants' implantable defibrillators or pacemakers; and

k. All calendars, agendas, or other materials reflecting meetings (whether in person or by telephone) between you and Defendants relating to Defendants' implantable defibrillators or pacemakers.

2. All documents obtained by you from Defendants referring or relating to Defendants' implantable defibrillators or pacemakers, or any related inquiry, investigation, or litigation.

3. All documents referring or relating to Defendants' Independent Panel, including but not limited to, any document referring or reflecting the selection of members of the Independent Panel.

4. All documents relating to Defendants' payment for your services in relation to providing professional services relating to Defendants' implantable defibrillators and pacemakers, including your engagement letter(s) with Defendants and all invoices pertaining to services rendered to Defendants with respect to Defendants' implantable defibrillators and pacemakers.

5. All documents referring or relating in any way to Defendants' implantable defibrillators and pacemakers, which you have provided, or intend to provide, to third parties, including but not limited to, any United States Attorney, the Securities and Exchange Commission, or the FDA.

6. All documents relating to the retention, destruction, disposal, or preservation of your documents that are or would have been responsive to this Subpoena, including electronically stored data.

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
THIRD DIVISION

In re: Guidant Corp. Implantable
Defibrillators Products Liability Litigation

MDL No. 05-1708
(DWF/AJB)

This document relates to all actions.

NOTICE OF SERVICE OF SUBPOENAS DUCES TECUM

PLEASE TAKE NOTICE THAT Plaintiffs, by their attorneys, will request the production of documents from the following non-party:

Stanwich Group LLP
c/o Juerg A. Heim
Ivey, Barnum & O'Mara LLC
170 Mason Street
Greenwich, CT 06830

See Exhibit 1. This request for production will be made pursuant to subpoenas *duces tecum* issued to this non-party, will be signed by Plaintiffs' counsel, and will be issued and served from the United States District Court for the District of Connecticut. Plaintiffs' counsel will provide Defendants' counsel with copies of all documents produced by the non-party.

PLEASE TAKE FURTHER NOTICE THAT the non-party, pursuant to Rule 45(e) of the Federal Rules of Civil Procedure, may be held in contempt of court if he fails without adequate excuse to obey the subpoena served on him and that he has certain legal rights in response to Plaintiffs' subpoena as provided in Rule 45(c) and (d), which provisions are reproduced in full at page 2 of the subpoena.

Respectfully submitted,

Dated: May 30, 2007

ZIMMERMAN REED, PLLP

s/ Charles S. Zimmerman

Charles S. Zimmerman, #120054
651 Nicollet Mall, Suite 501
Minneapolis, MN 55402
Telephone: (612) 341-0400
Facsimile: (612) 341-0844

Liaison Counsel and
Lead Counsel Committee

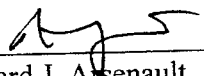
LIEFF, CABRASER, HEIMANN
& BERNSTEIN, LLP

s/ Elizabeth J. Cabraser

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Lead Counsel Committee

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Lead Counsel Committee

LOCKS LAW FIRM, PLLC

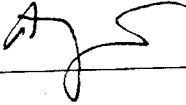
s/ Seth Lesser

Seth Lesser
110 East 55th St., 12th Floor
New York, NY 10022
Telephone: (212) 838-3333
Facsimile: (212) 838-3735

Lead Counsel Committee

CERTIFICATE OF SERVICE

I hereby certify that, on this 30th day of May 2007, a copy of the foregoing document was provided to the following, by the methods indicated below.


A handwritten signature in black ink, appearing to be 'AS', is written over a horizontal line.

Via Electronic Mail and First Class Mail

Timothy A. Pratt
Deborah A. Moeller
Andrew D. Carpenter
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2555 Grand Boulevard
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