UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
THIRD DIVISION

In re: Guidant Corp. Implantable Defibrillators Products Liability Litigation	MDL No. 1708 (DWF/AKB)
This Document Relates to Leopoldo Duron, Jr. vs. Guidant Corp., et al.	Case No. 06-00025

DEFENDANTS' CONSOLIDATED MOTION IN LIMINE

Defendants Guidant Corporation, Guidant Sales Corporation, Cardiac Pacemakers, Inc., respectfully submit this Motion in Limine to exclude the improper use of various categories of evidence during trial or in the presence of the jury:

I. Evidence of Any Merger or Acquisition in Which Defendants Were Involved or Potentially Involved, or Guidant's Employees' or Independent Contractors' Compensation or Securities Transactions

II. Statements About or References to Any Plaintiff That is Not a Named Device Recipient in This Case

III. Statements About or References to Any Guidant Products or Recalls of Products Other Than the Ventak Prizm 2 Dr, Model 1861

IV. Statements, Documents, Testimony or References Regarding Other Litigation or Investigations, Including by the SEC, DOJ, Attorneys General or Congress

V. Statements About, References to, Testimony Regarding, or Documents Regarding the Ancure Endograft System or Guidant's Corporate Integrity Agreement

VI. Statements, Documents, Testimony or References to Subsequent Remedial Measures (Consolidated)

VII. Evidence of Shipment and Sale of "Pre-Mitigation" Devices After the April 2002 Manufacturing Change

VIII. References to or Evidence of Medical Complications

694686

IX. Evidence Regarding Non-Parties in Support of Punitive Damages

WHEREFORE, Defendants pray that the Court grant Defendants' Motion In Limine.

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: /s/ Timothy A. Pratt
Missouri Bar No. 26729
2555 Grand Blvd.
Kansas City, Missouri 64108-2613
Telephone: 816.474.6550
Facsimile 816.421.5547

Joseph M. Price
FAEGRE & BENSON
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402-3901
Telephone: 612.766.7000
Facsimile: 612.766.1600

Attorneys for Defendants