

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

In re GUIDANT CORP. IMPLANTABLE  
DEFIBRILLATORS PRODUCTS  
LIABILITY LITIGATION

MDL No. 05-1708 (DWF-AJB)

This Document Relates to:

JOSEPH D. TRUXILLO, SR.,  
Plaintiff,

v. Case No. 06-cv-03400

GUIDANT CORPORATION, ET AL.,  
Defendants.

**NOTICE OF  
WITHDRAWAL AND  
SUBSTITUTION AS  
COUNSEL OF RECORD**

**NOTICE OF WITHDRAWAL AND SUBSTITUTION OF  
COUNSEL OF RECORD FOR DEFENDANTS GUIDANT CORPORATION,  
GUIDANT SALES CORPORATION, CARDIAC PACEMAKERS, INC.,  
AND BOSTON SCIENTIFIC CORPORATION**

Pursuant to Rule 83.7(b) of the Local Rules of the United States District Court for the District of Minnesota, the undersigned attorney hereby notifies the Court and counsel that Susanne M. Burstein, currently listed as counsel of record for Defendants Guidant Corporation, Guidant Sales Corporation, Cardiac Pacemakers, Inc., and Boston Scientific Corporation, wishes to withdraw as counsel for Defendants Guidant Corporation, Guidant Sales Corporation, Cardiac Pacemakers, Inc., and Boston Scientific Corporation in this case because she is no longer associated with the law firm of Chaffe McCall, L.L.P. Defendants Guidant Corporation, Guidant Sales Corporation, Cardiac Pacemakers, Inc., and

Boston Scientific Corporation will continue to be represented by Brent A. Talbot, John F. Olinde, and Peter J. Rotolo, III of the law firm of Chaffe McCall, L.L.P. Further, Lauren M. Venturatos of the law firm of Chaffe McCall, L.L.P. hereby notifies the Court and counsel that she shall appear as counsel of record for Defendants Guidant Corporation, Guidant Sales Corporation, Cardiac Pacemakers, Inc., and Boston Scientific Corporation in this case and shall be substituted as counsel for Susanne M. Burstein and that such substitution shall not delay the progress of this case.

Respectfully submitted,

s/Susanne M. Burstein  
Susanne M. Burstein (La. Bar No. #28515)  
23 DeMott Street  
Tenafly, NJ 07670

s/Lauren M. Venturatos  
Brent A. Talbot, T.A. (La. Bar No. #19174)  
John F. Olinde (La. Bar No. #1515)  
Peter J. Rotolo, III (La. Bar No. #21848)  
Lauren M. Venturatos (La. Bar No. #30778)  
**CHAFFE McCALL, L.L.P.**  
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1100 Poydras Street  
New Orleans, Louisiana 70163  
Telephone: (504) 585-7000  
**Attorneys for Guidant Corporation, Guidant  
Sales Corporation, Cardiac Pacemakers,  
Inc., and Boston Scientific Corporation**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading has been filed with the United States District Court for the District of Minnesota by electronic case filing/case management and served on all counsel of record by either electronic mail or by placing a copy of same in the United States mail, properly addressed and with adequate postage affixed thereon.

New Orleans, Louisiana, this 28<sup>th</sup> day of June, 2007.

s/ Lauren Venturatos\_\_\_\_\_