

EXHIBIT B

**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.,
v. Case No. 06-cv-25
Guidant Corporation, et al.

DEFENDANTS' AMENDED EXPERT DISCLOSURE
PURSUANT TO PRE-TRIAL ORDER NO. 25

Defendants, for their Expert Disclosures pursuant to Pre-Trial Order No. 25, state as follows:

RETAINED EXPERTS

- 1) John E. Moalli, Sc.D.
Group Vice President and Principal Engineer
Exponent
149 Commonwealth Drive
Menlo Park, California 94025
- 2) David F. Williams, Ph.D., D.Sc.
Department of Clinical Engineering
Royal Liverpool University Hospital
P.O. Box 147
Liverpool, United Kingdom L69 3GA
- 3) Kenneth A. Ellenbogen, M.D.
Vice-Chairman of Cardiology and Director of Clinical Cardiac Electrophysiology
and Pacing
Virginia Commonwealth University
Medical College of Virginia
P.O. Box 980053
Richmond, Virginia 23298-0053

- 4) Thomas Ross, M.D.
Arizona Cardiology Group
340 East Palm Lane
Suite 175
Phoenix, Arizona 85004
- 5) Robert Sheridan
632 Dundee Drive
Wilmington, North Carolina 28405
- 6) Stephen D. Walter, Ph.D.
Professor, Department of Clinical Epidemiology and Biostatistics
McMaster University
Hamilton, Ontario, Canada L8N 3Z5
- 7) Robert P. Granacher, M.D.
St. Joseph Office Park
Suite A-400
1401 Harrodsburg Road
Lexington, Kentucky 40504
- 8) Kent W. Franks, M.D.
Forest Institute of Professional Psychology
2885 West Battlefield
Springfield, Missouri 65807

COMPANY WITNESSES

Defendants designate the following company witnesses who may have scientific, technical or other specialized knowledge that may assist the jury.

- 1) Randy Nuernberg
Vice President, Product Engineering
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. Nuernberg may provide testimony regarding corporate standards, reliability estimates, research and development of the 1861, manufacturing, continuing engineering, industry standards, device standards, internal policies, reliability, PPR's, quality assurance, as well as other subject matters addressed in his deposition. Mr. Nuernberg may opine regarding the reliability of the 1861 and other matters within his background. Mr. Nuernberg may discuss the manufacture and testing of Mr. Duron's device. Mr. Nuernberg may respond to expert testimony within these areas.

- 2) Todd Koning
Manager II, Finance
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. Koning may provide testimony regarding financial issues, as well as other subject matters addressed in his deposition.

- 3) Scott Olson
Director of Market Development
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. Olson may provide testimony regarding marketing and other subject matters addressed in his deposition.

- 4) Chris Harrold
Vice President, Regulatory and Compliance
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. Harrold may provide testimony regarding regulatory and compliance issues, as well as other subject matters addressed in his deposition. He may testify regarding interactions with regulatory bodies, including communications with FDA. He may testify regarding the regulatory issues in connection with the 1861. He may also testify regarding internal policies and reliability estimates. He may respond to expert testimony within these areas.

- 5) Bill McConnell
Senior Vice President, Administration
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. McConnell may provide testimony regarding corporate structure, corporate history, corporate conduct, corporate finances and corporate citizenship. He may respond to expert testimony within these areas.

- 6) Allan Gorsett
Former Vice President, Reliability and Quality Assurance
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. Gorsett may provide testimony on reliability and quality issues, as well as other subject matters addressed in his deposition.

- 7) Beverly Lorell, M.D.
Former Chief Medical and Technology Officer
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Dr. Lorell may provide testimony regarding medical issues, communication, and reliability, as well as other subject matters addressed in her deposition.

- 8) Dan Tich
Manager II, Quality Assurance
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. Tich may provide testimony regarding the Company's communication protocols, as well as other subject matters addressed in his deposition.

- 9) Keith Johnson
Former Director of Reliability Engineering and Device Analysis
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. Johnson may provide testimony regarding reliability, engineering, device analysis, as well as other subject matters addressed in his deposition.

- 10) Dale DeVries
Former Vice President, Regulatory and Compliance
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. DeVries may offer testimony regarding regulatory and compliance issues, as well as other subject matters addressed in his deposition.

- 11) Brian Novak
Manager II, Regulatory Affairs
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. Novak may offer testimony regarding regulatory and compliance issues regarding the 1861, including its approval process and history, including, but not limited to, PMA submissions, PMA approval, and real time review; and the history of the approval of polyimide as an insulator, as well as other subject matters addressed in his deposition and affidavit. He may respond to expert testimony within these areas.

- 12) Kathy Lundberg
Senior Vice President and Chief Compliance Officer
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Ms. Lundberg may provide testimony regarding compliance, as well as other subject matters addressed in her deposition.

- 13) Renold Russie
Director of Product Performance
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. Russie may offer testimony regarding research, design and development, of the 1861, continuing engineering, reliability, PPR's, quality assurance, industry standards, device standards, as well as other subject matters addressed in his deposition. He may address allegations of underreporting and reliability of the 1861. He may respond to expert testimony within these areas.

- 14) Joseph Smith, M.D.
Former Chief Medical Officer
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Dr. Smith may offer testimony regarding communication, reliability, warnings, risks of ICD's, complications of explant surgery, ICD implantation, functionality of ICD's, PPR's, and industry standards, as well as other subject matters addressed in his deposition. He may respond to expert testimony within these areas. He may offer testimony regarding Mr. Duron's medical conditions, the implantation and explanation of his device, and the functioning and testing of his device.

- 15) Michael Smith
Research Scientist
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. Smith may provide testimony on device testing and matters in accordance with his deposition.

- 16) Sylvia Radford
Engineer II, Quality Assurance
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Ms. Radford may provide testimony regarding the product performance and trend issues concerning the 1861, as well as other subject matters addressed in her deposition.

- 17) Lynn Elliott
Former Vice President, Research
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. Elliott may provide testimony regarding 1861 performance and recall-related issues and meetings with regulators, panels and organizations on medical device-related issues, as well as other subject matters addressed in his deposition.

- 18) Jack Litzau
Principal Statistician
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. Litzau may provide testimony regarding statistics concerning the 1861, as well as other subject matters addressed in his deposition.

- 19) Susan Thompson
Specialist I, Engineering
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Ms. Thompson may provide testimony regarding reliability and engineering concerning the 1861. Further, she will provide testimony regarding the manufacturing, inspection and testing of Mr. Duron's device consistent with the documents produced by the company. She may respond to expert testimony within these areas.

- 20) Fred McCoy
Former President
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. McCoy may provide testimony regarding corporate history, corporate structure, corporate citizenship, and other matters pertaining to Guidant.

- 21) Richard Vogel
Vice President and CFO
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. Vogel may provide testimony on financial matters, as well as other subject matters addressed in his deposition.

- 22) Steven McQuillan
Director of Clinical Applications Research Studies (CARS)
c/o Guidant Corporation
4100 Hamline Avenue North
St. Paul, Minnesota 55112

Mr. McQuillan may provide testimony regarding the clinical studies concerning the 1861, as well as other subject matters addressed in his deposition.

NON-RETAINED EXPERTS

- 1) Steven L. Higgins, M.D.
Cardiac Arrhythmia Associates
9850 Genesee Avenue, Suite 940
La Jolla, California 92037

Dr. Higgins may provide opinion testimony within his area of expertise as a treating physician of Mr. Leopoldo Duron concerning Mr. Duron's medical care and treatment and his underlying health issues. In addition, Dr. Higgins may offer opinions on topics and subject matters set forth within the videotapes of Dr. Higgins which have been produced. Dr. Higgins may also offer opinions regarding communication, reliability, warnings, risks of ICD's, complications of explant surgery, ICD implantation, functionality of ICD's, PPR's, and industry standards. Dr. Higgins may also offer opinions regarding topics and subject matters set forth within the article entitled "The Dark Side of the New Era," PACE, Vol. 29, 459-60 (May 2006).

Defendants reserve the right to call as witnesses and/or elicit opinion testimony from any expert witness disclosed by Plaintiff, and further reserve the right to amend its expert disclosures upon receipt and review of Plaintiff's expert reports.

Respectfully submitted,

SHOOK, HARDY & BACON L.L.P.

By: Michael D. Moeller
Timothy A. Pratt, Esq.
Missouri Bar No. 26729
2555 Grand Boulevard
Kansas City, Missouri 64108-2613
Telephone: 816.474.6550
Facsimile: 816.421.5547

Deborah A. Moeller, Esq.
Missouri Bar No. 44009
2555 Grand Boulevard
Kansas City, Missouri 64108-2613
Telephone: 816.474.6550
Facsimile: 816.421.5547

Michael D. Moeller, Esq.
Missouri Bar No. 42324
2555 Grand Boulevard
Kansas City, Missouri 64108-2613
Telephone: 816.474.6550
Facsimile: 816.421.5547

ATTORNEYS FOR DEFENDANTS

I hereby certify that the original of the foregoing document was sent by U.S. Mail and emailed on the 16th day of April, 2007 to:

Thomas Schultz
Lopez, Hodes, Restaino, Milman & Skikos
450 Newport Center Drive
2nd Floor
Newport Beach, California 92660
tschultz@lopez-hodes.com

And with email copies sent to:

Richard Arsenault
Neblett, Beard & Arsenault
2220 Bonaventure Court
Alexandria, Louisiana 71301
rarsenault@nbalawfirm.com

Elizabeth J. Cabraser
Lieff, Cabraser, Heimann & Bernstein LLP
275 Battery Street, 30th Floor
San Francisco, California 94111-3339
ecabraser@lchb.com

Seth Lesser
Locks Law Firm, PLLC
110 E. 55th Street
New York, New York 10022
slesser@lockslawny.com

Charles S. Zimmerman
Zimmerman & Reed
651 Nicollet Mall
Suite 501
Minneapolis, Minnesota 55402
csz@zimmreed.com


Michael D. Moeller