

Exhibit B

May 16, 2007

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VIA ELECTRONIC MAIL

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**Re: In re: Guidant Corp. Implantable Defibrillators Products Liability
Litigation, MDL 1708: Confidentiality Objections**

Dear Counsel:

I have received your May 3, 2007 letter attaching Exhibit A and containing your objection to "the confidential designation of all documents listed in Exhibit A." After a complete review of the documents listed, Guidant responds to your objection as follows:

A. Documents which were produced by Guidant, but which were not designated confidential

Eight of the documents listed in Exhibit A were produced by Guidant but Guidant has not designated them as confidential in the MDL litigation. Because these documents were produced by Guidant without the confidential designation, there is no further action required with respect to these specific documents. Again, Plaintiffs' objection to the alleged confidential designation of these documents is nonsensical.

CPI 39 00000033 - CPI 39 00000105

CPI 84 00000982 - CPI 84 00001008

CPI 84 00004421 - CPI 84 00004425

CPI 95 0000001 - CPI 95 0000009

CPI 127 00000236 - CPI 127 00000237

CPI 141 00005602 - CPI 141 00005603

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CPI 168 00001725 - CPI 168 00001733

CPI 508 00073597 - CPI 508 00073606

B. Documents which Guidant will agree to dedesignate as confidential

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Guidant has reviewed the following documents and Guidant agrees to dedesignate the following documents as confidential. Guidant will reproduce these documents without the confidentiality designation, with the exception of any document which was produced as part of a larger document, for which Guidant is not willing to dedesignate the entire document as confidential. Therefore only the pages cited by Plaintiffs in Exhibit A will be dedesignated.

CPI 35 00000001 - CPI 35 00000003

CPI 35 00000016 - CPI 35 00000065

CPI 43 00000001 - CPI 43 00000017

CPI 48 00000079 - CPI 48 00000080

CPI 66 00000480

CPI 87 00027828 - CPI 87 00027840

CPI 87 00027883 - CPI 87 00027885

CPI 87 00027935 - CPI 87 00027972

CPI 88 00039817 - CPI 88 00039819

CPI 88 00058799

CPI 88 00084103 - CPI 88 000841008

CPI 92 00008712 - CPI 92 00008715

CPI 92 00009132 - CPI 92 00009134

CPI 92 00010581 - CPI 92 00010585

CPI 92 00015462 - CPI 92 00015467

CPI 92 00021144 - CPI 92 00021150

CPI 92 00035839 - CPI 92 00035841

CPI 92 00057107

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CPI 93 00047988 - CPI 93 00047990
CPI 94 00138755 - CPI 9400138757
CPI 100 00012709 - CPI 100 00012712
CPI 100 00019001
CPI 100 00020954 - CPI 100 00020955
CPI 100 00056092 - CPI 100 00056103
CPI 103 00000043 - CPI 103 00000051
CPI 101 00039836 - CPI 101 00039844
CPI 141 00005604 - CPI 141 00005610
CPI 141 00007745
CPI 141 00009212
CPI 165 00014985 - CPI 165 00014993
CPI 168 00003316 - CPI 168 00003320
CPI 176 00003007 - CPI 176 00003009
CPI 176 00007568
CPI 183 00008680 - CPI 183 00008681
CPI 187 00000868 - CPI 187 00000873
CPI 501 00080186 - CPI 501 00080187

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C. Documents for which Guidant maintains its confidential designations

As to the remaining documents listed on Plaintiffs' Exhibit A, Guidant maintains its confidential designation of these documents. These documents are subject to confidentiality protection under the court's protective order and existing law, as they contain trade secret or proprietary information that, if made public, will cause substantial and irreparable harm to Guidant.

CPI 2 00000003 - CPI 2 00000101
CPI 2 00000103 - CPI 2 00000104

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CPI 2 00001361 - CPI 2 00001375
CPI 2 00001597 - CPI 2 00001609
CPI 2 00016597 - CPI 2 00016622
CPI 4 00031192 - CPI 4 00031196
CPI 22 00011330 - CPI 22 00011448
CPI 35 00000004 - CPI 35 00000015
CPI 35 00000066 - CPI 35 00000084
CPI 36 00000159 - CPI 36 00000161
CPI 36 00000203 - CPI 36 00000206
CPI 40 00000618 - CPI 40 00001055
CPI 46 00351494 - CPI 46 00351516
CPI 63 00557886 - CPI 63 00557912
CPI 83 00070269
CPI 87 00002769 - CPI 87 00002781
CPI 87 00009314 - CPI 87 00009320
CPI 87 00010061 - CPI 87 00010063
CPI 87 00010246 - CPI 87 00010251
CPI 87 00011386 - CPI 87 00011392
CPI 87 00012436 - CPI 87 00012437
CPI 87 00021256 - CPI 87 00021258
CPI 87 00027985 - CPI 87 00028005
CPI 87 00031626 - CPI 87 00032204
CPI 88 00070884 - CPI 88 00070901
CPI 88 00081462 - CPI 88 000081476
CPI 90 00041300 - CPI 90 00041321

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CPI 92 00006762 - CPI 92 00006766
CPI 92 00007468 - CPI 92 00007474.36
CPI 92 00011296 - CPI 92 00011302
CPI 92 00049028 - CPI 92 00049032
CPI 93 00005857 - CPI 93 00005893
CPI 93 00029649
CPI 93 00036860 - CPI 93 00036917
CPI 93 00100633 - CPI 93 00100634
CPI 100 00000001 - CPI 100 00002682
CPI 100 00021035 - CPI 100 00021050
CPI 101 00062401 - CPI 101 00062407
CPI 109 00000285 - CPI 109 00000590
CPI 109 00000310 - CPI 109 00000311
CPI 113 00015862 - CPI 113 00015870
CPI 119 00012731 - CPI 119 00012739
CPI 119 00013760 - CPI 119 00013764
CPI 119 00016772 - CPI 119 00016786
CPI 119 00062515 - CPI 119 00062523
CPI 119 00069763 - CPI 119 00069775
CPI 135 00000135 - CPI 135 00000140
CPI 168 00003089 - CPI 168 00003091
CPI 168 00003095 - CPI 168 00003097
CPI 168 00004080 - CPI 168 00004085
CPI 179 00001008 - CPI 179 0001012
CPI 179 00001204 - CPI 179 0001206

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CPI 179 00002570 – CPI 179 00002571

CPI 183 00021894

CPI 183 00050762 – CPI 183 00050767

CPI 185 00013490 – CPI 185 00013491

CPI 187 00001268 – CPI 187 00001269

CPI 192 00015893 – CPI 192 00015899

CPI 213 00028682 – CPI 213 00028731

CPI 214 00023494 – CPI 214 00023495

CPI 500 00006796 – CPI 500 00006799

CPI 500 00013442 - CPI 500 00013443

CPI 504 00024744- CPI 504 00024759

CPI 508 00143927 – CPI 508 00143930

CPI 525 00036722 – CPI 525 00036723

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Please contact me if you would like to discuss these issues further.

Sincerely,


Andrew D. Carpenter

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