

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
THIRD DIVISION

In re: Guidant Corp. Implantable
Defibrillators Products Liability Litigation

MDL No. 1708
(DWF/AJB)

This document relates to all actions.

**LOCAL RULE 7.1(C) CERTIFICATE OF COMPLIANCE WITH
WORD COUNT LIMITATIONS RELATING TO PLAINTIFFS' MOTION TO
COMPEL PRODUCTION OF MATERIAL FROM DEFENDANTS' BACKUP TAPES**

The undersigned Plaintiffs' counsel certifies that Plaintiffs' Memorandum in Support of Plaintiffs' Motion To Compel Production of Material From Defendants' Backup Tapes complies with Local Rule 7.1(c); that the memorandum was prepared in Microsoft Word 2003; that this word-processing program has been applied specifically to include all text, including headings, footnotes, and quotations; and that the above-referenced Memorandum contains 2,731 words.

Dated: August 28, 2006

ZIMMERMAN REED, PLLP

s/ Charles S. Zimmerman

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