

EXHIBIT C

From: Elizabeth Peterson
To: [REDACTED]
Date: 5/23/2006 6:29:31 PM
Subject: Guidant Plaintiff Fact Sheets

We have recently received a list of names from Defendant's counsel of Plaintiffs who have missed their deadline to turn in the court ordered Plaintiff Fact Sheet. The Defendant in the recent past has filed motions to dismiss cases of this nature. Two of your clients were on this list ([REDACTED]).

Please see attached letter for information on where to send your clients' Plaintiff Fact Sheets

Thank you,
Elizabeth Peterson

GUIDANT PRODUCTS LITIGATION MDL NO. 1708

Lead Counsel Committee

Richard J. Arsenault
Elizabeth J. Cabraser
Seth R. Lesser
Charles S. Zimmerman

Plaintiffs' Liaison Counsel

Charles S. Zimmerman

651 Nicollet Mall, Suite 501
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Steering Committee Members

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Silvija A. Strikis
Teresa C. Toriseva
Sol Weiss
Justin Witkin

May 23, 2006

URGENT: This is an important reminder about your clients' cases (). Cases will be dismissed if Plaintiff Fact Sheets are not timely submitted

Dear Mr. :

On January 26, 2006, Judge Donovan Frank issued Pretrial Order No. 2 approving a Plaintiff's Fact Sheet for In re: Guidant Corp. Implantable Defibrillators Products Liability Litigation. Pretrial Order No. 5 laid out the time lines for Plaintiff's to return the Plaintiff's Fact Sheets to the Defendants. Section 12 of this Pretrial Order states that Plaintiff's Fact Sheets were to be turned in "no later than 30 days after the entry of this order" and for cases transferred or filed after this order, 30 days after the filing or docketing date.

We have recently received a list of names from Defendant's counsel of Plaintiffs who have missed their deadline to turn in the court ordered Plaintiff Fact Sheet. The Defendant in the recent past has filed motions to dismiss cases of this nature. To avoid this outcome, we urge you to forward your Plaintiff's Fact Sheet to Shook, Hardy & Bacon at the contact information provided below. While we oppose such a position with the Court, we cannot guarantee that the Court might not agree with the request.

Jane Bartley
Shook, Hardy & Bacon LLP
2555 Grand Boulevard
Kansas City, MO 64108
Facsimile: (816) 421-5547

For record purposes we also request that you send a copy to Tina Olson at Zimmerman Reed at:

Elizabeth Peterson
Zimmerman Reed, PLLP
651 Nicollet Mall
Suite 501
Minneapolis, MN 55402
eap@zimmreed.com
Facsimile: (612) 341-0844

We appreciate your timely response as we would like to show a good faith effort to provide both the Court and the Defendants with the necessary information to proceed efficiently with this litigation.

Very truly yours,

ZIMMERMAN REED, PLLP

s/

Charles S. Zimmerman

LIEFF, CABRASER, HEIMANN
& BERNSTEIN, LLP

s/

Elizabeth J. Cabraser

CSZ:tmo
enc.

NEBLETT, BEARD & ARSENAULT

s/

Richard J. Arsenault

LOCKS LAW FIRM PLLC

s/

Seth Lesser

From: Elizabeth Peterson
To: [REDACTED]
Date: 5/30/2006 12:11:34 PM
Subject: Re:

Thank you for sending copies of the PFS for [REDACTED]. Please note that in addition to the PFS, Defense needs a signed HIPPA and declaration from each plaintiff (last two pages of the PFS).

If you have not already done so, please forward a copy of the signed declaration and HIPPA form to Jane Bartely at Shook Hardy ASAP.

Thank you,
Elizabeth Peterson

>>> "[REDACTED]" 05/26/06 5:00 PM >>>
Please find attached PFS associated with MDL [REDACTED]

If you have any questions, do not hesitate to contact me.

[REDACTED]

Paralegal

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

A	Letter sent	Response	PFS in	Motion to Dismiss	Calls	returned calls	Withdrawn	ZR PFS received	2nd calls
B	faxed 5/24/06; emailed 5/24/06			5/25/2006			6/2/2006		
C	faxed 5/24/06; emailed 5/24/06			5/25/2006			6/2/2006		
D	faxed 5/24/06; emailed 5/24/06			5/25/2006			6/2/2006		
E	faxed 5/23/06; emailed 5/23/06		5/30/2006- w/o HIPPA signed	5/25/2006				5/30/2006	
F	faxed 5/24/06; emailed 5/24/06	Turn over problems, meeting with client, expect PFS soon	6/28/2006	5/25/2006				6/28/2006	
G		Extention							
H	faxed 5/17/06		5/19/2006			remanded to state court			

I	faxed 5/23/06		mailed 5/12/06	5/25/2006			6/14/2006		
J									
K	faxed 5/17/06		mailed 5/12/06	5/25/2006			6/8/2006		
L			5/30/2006- w/o HIPPA signed; 5/12/06						
M	faxed 5/24/06; emailed 5/24/06		HIPPA signed; HIPPA 6-7- 06	5/25/2006			5/30/2006		
N	faxed 5/24/06; emailed 5/24/06		5/30/2006- w/o HIPPA signed	5/25/2006				5/30/2006	
O			mailed 5/12/06						

P	faxed 5/24/06; emailed 5/24/06	called 5-24-06: helped find PFS on court website, download ed and will get filled out ASAP	5/30/2006 mailed 5/12/06	5/25/2006						5/30/2006	
Q											
R		Extention until 5/27/06		5/25/2006						Yes	
S	faxed 5/24/06; emailed 5/24/06		5/31/2006								
T	faxed 5/24/06; emailed 5/24/06										
U	faxed 5/24/06; emailed 5/24/06	Has requested extension									
V			mailed 5/12/06								

