

EXHIBIT E

From: Elizabeth Peterson
To: [REDACTED]
Date: 9/7/2006 12:31:51 PM
Subject: Guidant Motion to Compel ([REDACTED])

Counsel:

On September 1, 2006, the Defendants filed a Motion to Compel Production of Completed Plaintiff Fact Sheets and Executed Medical Records Authorization. The motion also requests sanctions in the form the awarding of Defendants' costs and attorneys fees in bringing this motion. **Your client [REDACTED] was on this list for failure to supply an executed medical records authorization.** Judge Frank has entered an Order relating to this motion to compel. The Order states that plaintiffs shall submit their response to the Motion no later than **September 13, 2006.**

I have attached the Motion and supporting memo, the Order and a Medical Authorization Sheet.

Accordingly, we urge you to remedy your deficiency immediately and to send it to Jane Bartley from Shook, Hardy & Bacon at:

Jane Bartley
Shook, Hardy & Bacon LLP
2555 Grand Boulevard
Kansas City, MO 64108
Phone: (816) 474-6550
Facsimile: (816) 421-5547

Thank you for you timely response
Elizabeth Peterson

Elizabeth Peterson
Zimmerman Reed
651 Nicollet Mall, Ste. 501
Minneapolis, MN 55402
(612) 341-0400

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

Elizabeth Peterson
Zimmerman Reed, PLLP
651 Nicollet Mall
Suite 501
Minneapolis, MN 55402
eap@zimmreed.com
Phone: (612) 341-0400
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

	Deficiencies	Contact	Response
A	Medical records auth. Needed	emailed 9/7/2006	Will not provide "blank authorizations"; forwarded email, filing opposition motion
B	medical records auth. needed	emailed 9/7/2006	Withdrawn 9/11/2006
C			responded; already working on
D	Medical records auth. Needed	emailed 9/7/2006	Motion withdrawn 9/7/2006
E		emailed 9/7/2006	
F	Medical records auth. Needed	emailed 9/7/2006	Motion withdrawn 9/11/2006
G	Medical records auth. Needed	emailed 9/7/2006	responded; already working on; withdrawn 9/11/2006

H	Medical records auth. Needed	emailed 9/7/2006	responded; already working on; withdrawn 9/11/2006
I	Medical records auth. Needed	emailed 9/7/2006	Will not provide "blank authorizations"; forwarded email; filing opposition motion
J	Medical records auth. Needed	emailed 9/7/2006	responded; already working on; withdrawn 9/11/2006
K			
L	PFS sections and medical records authorization	emailed 9/7/2006	Stipulation to enter deficiencies by 9/27/2006
M	PFS sections and medical records authorization	emailed 9/7/2006	9/18/2006 Court order completed PFS and \$1000 sanctions
N	PFS sections and medical records authorization	emailed 9/7/2006	Stipulation to enter deficiencies by 9/27/2006
O	PFS sections and medical records authorization	emailed 9/7/2006	Stipulation to enter deficiencies by 9/27/2006
P	PFS sections and medical records authorization	emailed 9/7/2006; emailed to see what she knows	Dismissing case

Q	PFS sections and medical records authorization	emailed 9/7/2006	Stipulation to enter deficiencies by 9/27/2006
R	PFS sections and medical records authorization	emailed 9/7/2006	Stipulation to enter deficiencies by 9/27/2006
S	PFS sections and medical records authorization	emailed 9/7/2006	Stipulation to enter deficiencies by 9/27/2006
T	PFS sections and medical records authorization	emailed 9/7/2006	motion withdrawn 9/7/2006
U	PFS sections and medical records authorization	emailed 9/7/2006	Stipulation to enter deficiencies by 9/27/2006