

EXHIBIT F

From: Elizabeth Peterson
To: [REDACTED]
Date: 9/19/2006 10:46:45 AM
Subject: In re: Guidant Prod. Lit. Plaintiff Fact Sheet

Dear Counsel,

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. According to this list you have one or more claims with outstanding PFS. The Defense has indicated that they will move to dismiss these cases if the Plaintiff Fact Sheet is not received in a timely manner.

Please see attached letter for information on which of your cases are missing Plaintiff's Fact Sheets and where to send your client's Plaintiff Fact Sheet.

Please feel free to contact me if you have any questions regarding the Plaintiff's Fact Sheets.

Thank you,
Elizabeth Peterson

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

GUIDANT PRODUCTS LITIGATION MDL NO. 1708

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Teresa C. Toriseva
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September 19, 2006

Address Block

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

Dear _____:

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. Defense counsel has stated that they intend to file motions to dismiss for cases with delinquent Plaintiff's Fact Sheet. The above listed case(s) was on the list of cases to dismiss that Defense provided. 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. The Court has dismissed cases in this MDL for failure to provide Plaintiff Fact Sheets in a timely manner. Accordingly, we urge you to complete the Plaintiff's Fact Sheet as required by Pretrial Order No. 5 **immediately** and to send them 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

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
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

	Previous contact	Motion to Dismiss	9-18-2006 Contact	Response
A			emailed 9-19-2006; faxed 9-19-2006	Dismissing
B			emailed 9-19-2006; faxed 9-19-2006	emailed back: working on getting PFSSs in ASAP; ZR received 9-25-3006 (declaration and medical authorization not signed)
C			emailed 9-19-2006	called back, left message has questions; called back wondering how to get an extension-- transferring case to another attorney
D			emailed 9-19-2006; faxed 9-19-2006	Will have in to Jane on 9/22/2006
E			emailed 9-19-2006	Sent 9-15-2006 to Shook Hardy; will call to double check that they got it: ZR received 9-18-2006
F			asking for extension	
G			emailed 9-19-2006; faxed 9-19-2006	emailed back: working on getting PFSSs in ASAP
H	Letter sent 8/1/2006; 8/28/2006-- Emailed Telling about motion to dismiss	8/22/2006	emailed all 9-19-2006	
I	8/28/2006-- emailed notice of motion to dismiss and asked for follow-up regarding Plaintiff	8/22/2006	emailed 9-19-2006; faxed 9-19-2006	emailed back: looking to have someone take over the case-- Zimmerman Reed trying to get in contact with to discuss; ZimmReed tried several times to contact Mr. Clark, at one point getting number to his mother; have left message for him to return call

J			emailed 9-19-2006; faxed 9-19-2006	emailed back; asking whether better to send in incomplete PFSs; told generally best to send something in-- but did suggest she contact Jane and see if she could get an extension to turn in a complete PFS
K			emailed 9-19-2006; faxed 9-19-2006	emailed back; asking whether better to send in incomplete PFSs; told generally best to send something in-- but did suggest she contact Jane and see if she could get an extension to turn in a complete PFS
L	8-30-2006 agreed to 3 week extension			ZR received 9-19-2006
M			emailed 9-19-2006; faxed 9-19-2006	emailed back; asking whether better to send in incomplete PFSs; told generally best to send something in-- but did suggest she contact Jane and see if she could get an extension to turn in a complete PFS
N			Sent last week; will check with Shook to make sure received	
O			emailed 9-19-2006	Waiting to hear about remand from district court; sent PDF and Word versions of PFS
P			emailed 9-19-2006; faxed 9-19-2006	Dismissing
Q			emailed 9-19-2006; faxed 9-19-2006	Dismissing

R	8-30-2006 agreed to 3 week extension			ZR received 9-19-2006
S			emailed 9-19-2006; faxed 9-19-2006	Called back: looking for copy of PFS-- send PDF and Word version of PFS; ZR Received 9-21-2006
T	8-30-2006 agreed to 3 week extension			ZR received 9-19-2006
U			emailed 9-19-2006	Sent 9-15-2006 to Shook Hardy; will call to double check that they got it; ZR received 9-18-2006
V			emailed 9-19-2006	Displaced by Katrina, just mailed PFS to attorney today; plans on having to Shook within the week
W				ZR received 9-19-2006
X				ZR received 9-19-2006
Y	9-1-2006 requested 2 week extension til 9-21-2006			
Z			emailed 9-19-2006; faxed 9-19-2006	ZR received 9-25-2006; missing declaration and medical authorization sheet
AA			Mailed 9-19-2006	

BB	Letter sent via email on 8/1/2006 regarding missing PFS			
CC	9-12-2006 agreed to extention until 10-13-2006			
DD			emailed 9-19-2006; faxed 9-19-2006	emailed back; asking whether better to send in incomplete PFSs; told generally best to send something in-- but did suggest she contact Jane and see if she could get an extension to turn in a complete PFS
EE			emailed 9-19-2006; faxed 9-19-2006	emailed back; asking whether better to send in incomplete PFSs; told generally best to send something in-- but did suggest she contact Jane and see if she could get an extension to turn in a complete PFS
FF	9-7-2006 requested 30 day extension (10-7-2006)		Has in, will send ASAP	
GG			emailed 9-19-2006; faxed 9-19-2006	
HH	8-11-2006 requeted 30 day extension; 8-18-2006 requested extension			ZR received 9-19-2006
II	9-12-2006 agreed to 30 day extension (10-12-2006)			
JJ			emailed 9-19-2006; faxed 9-19-2006	ZR received 9-25-2006

KK	8-31-2006 agreed to 3 week extension (9-21-2006)			
LL	8-31-2006 agreed to 3 week extension (9-21-2006)			
MM	8-31-2006 agreed to 3 week extension (9-21-2006)			
NN	8-31-2006 agreed to 3 week extension (9-21-2006)			
OO	Letter sent 8/1/2006 regarding missing PFS; 8-2-2206 sending PFS within one week			
PP	Letter sent 8/1/2006 about missing PFS; had extension until 8/26			
QQ			emailed 9-19-2006; faxed 9-19-2006	
RR			emailed 9-19-2006; faxed 9-19-2006	
SS			emailed 9-19-2006; faxed 9-19-2006	emailed back: working on getting PFSs in ASAP
TT	8-2-2006 agreed to a 2 week extension	Terminated 8-23-2006		

UU			emailed 9-19-2006	
VV	8-30-2006 agreed to 3 week extension (9-20-2006)			
WW				
XX	8-30-2006 agreed to 3 week extension (9-20-2006)			
YY	Letter sent 8/1/2006; 8/28/2006-- Emailed Telling about motion to dismiss		emailed all 9-19-2006	
ZZ	8-30-2006 agreed to 3 week extension (9-20-2006)			ZR received 9-25-2006
A1	8-30-2006 agreed to 3 week extension (9-20-2006)			