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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Janene Trujillo,

Plaintiff(s),

vs.

Zimmer, US, Inc., et al.

Defendant(s).

Case # 3:19-cv-00056-MMD-CBC

**VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL**

FILING FEE IS \$250.00

Tarifa B. Laddon, Petitioner, respectfully represents to the Court:
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of
Faegre Baker Daniels LLP
(firm name)

with offices at 11766 Wilshire Blvd., Suite 750,
(street address)
Los Angeles, California, 90025,
(city) (state) (zip code)
(310) 500-2126, tarifa.laddon@FaegreBD.com.
(area code + telephone number) (Email address)

2. That Petitioner has been retained personally or as a member of the law firm by
all Defendants to provide legal representation in connection with
[client(s)]
the above-entitled case now pending before this Court.

1 6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give
2 particulars if ever denied admission):

3 None.
4
5

6 7. That Petitioner is a member of good standing in the following Bar Associations.
7
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10 8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2
11 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
November 1, 2018	3:18-cv-00437-RCJ	USDC District of Nevada	Granted
November 8, 2018	2:18-cv-01744-GMN	USDC District of Nevada	Granted
January 31, 2019	2:16-cv-00264-APG	USDC District of Nevada	Granted
January 31, 2019	2:18-cv-02394-APG	USDC District of Nevada	Granted
January 31, 2019	2:19-cv-00043-RFB	USDC District of Nevada	Granted

12 (If necessary, please attach a statement of additional applications)

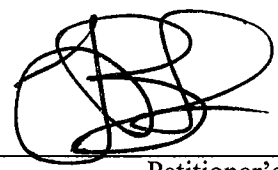
13 9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the
14 State of Nevada with respect to the law of this state governing the conduct of attorneys to the same
15 extent as a member of the State Bar of Nevada.
16

17 10. Petitioner agrees to comply with the standards of professional conduct required of
18 the members of the bar of this court.
19

20 11. Petitioner has disclosed in writing to the client that the applicant is not admitted to
21 practice in this jurisdiction and that the client has consented to such representation.
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That Petitioner respectfully prays that Petitioner be admitted to practice before this Court FOR THE PURPOSES OF THIS CASE ONLY.

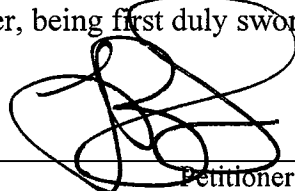


Petitioner's signature

STATE OF California)
COUNTY OF Los Angeles)

Tarifa B. Laddon, Petitioner, being first duly sworn, deposes and says:

That the foregoing statements are true.



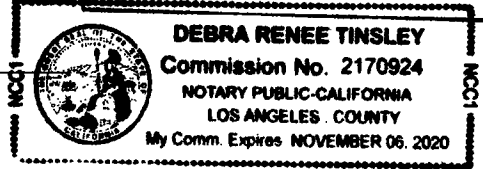
Petitioner's signature

Subscribed and sworn to before me this

18th day of March, 2019.

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

Debra Renee Tinsley
Notary Public or Clerk of Court



DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO THE BAR OF THIS COURT AND CONSENT THERETO.

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner believes it to be in the best interests of the client(s) to designate LeAnn Sanders, (name of local counsel) Attorney at Law, member of the State of Nevada and previously admitted to practice before the above-entitled Court as associate resident counsel in this action. The address and email address of said designated Nevada counsel is:

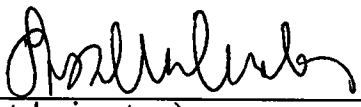
6605 Grand Montecito Pkwy., Suite 200
(street address)
Las Vegas, Nevada, 89149
(city) (state) (zip code)
702-384-7000, lsanders@alversontaylor.com
(area code + telephone number) (Email address)

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By this designation the petitioner and undersigned party(ies) agree that this designation constitutes agreement and authorization for the designated resident admitted counsel to sign stipulations binding on all of us.

APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL

The undersigned party(ies) appoint(s) LeAnn Sanders as
(name of local counsel)
his/her/their Designated Resident Nevada Counsel in this case.

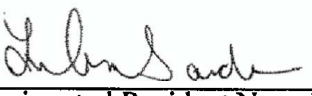

(party's signature)
Lisa M. Dunkin, Sr. Litigation Counsel
(type or print party name, title)

(party's signature)

(type or print party name, title)

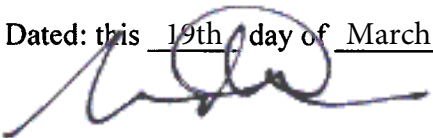
CONSENT OF DESIGNEE

The undersigned hereby consents to serve as associate resident Nevada counsel in this case.


Designated Resident Nevada Counsel's signature
000390 lsanders@alversontaylor.com
Bar number Email address

APPROVED:

Dated: this 19th day of March, 2019.



UNITED STATES DISTRICT JUDGE



THE STATE BAR OF CALIFORNIA

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

January 11, 2019

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, TARIFA BELLE LADDON, #240419 was admitted to the practice of law in this state by the Supreme Court of California on December 6, 2005; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Louise Turner
Custodian of Records

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FAEGRE BAKER DANIELS LLP
TARIFA B. LADDON (*Pro Hac Vice* pending)
tarifa.laddon@faegrebd.com
THEODORE O'REILLY (*Pro Hac Vice* pending)
theodore.oreilly@faegrebd.com
11766 Wilshire Boulevard, Suite 750
Los Angeles, CA 90025
Telephone: (310) 500-2090
Facsimile: (310) 500-2091

ALVERSON TAYLOR & SANDERS
LEANN SANDERS, ESQ. (Nevada Bar No. 000390)
lsanders@alversontaylor.com
6605 Grand Montecito Parkway, Ste. 200
Las Vegas, NV 89149
Telephone: (702) 384-7000

Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JANENE TRUJILLO,

Plaintiff,

vs.

ZIMMER, US, INC., a Delaware
Corporation,
SYNVASIVE TECHNOLOGY, a
California Corporation, BIOMET
ORTHOPEDECS, LLC, an Indiana
Limited Liability Company, BIOMET,
INC., an Indiana Corporation, and
DOES I-X, inclusive,

Defendants.

CASE NO.: 3:19-cv-00056-MMD-CBC

**AFFIDAVIT OF TARIFA B.
LADDON IN SUPPORT OF
VERIFIED PETITION AND
DESIGNATION OF LOCAL
COUNSEL**

Complaint Filed: November 16, 2018

1 I, Tarifa B. Laddon, hereby declare as follows:

2 1. I am an active member of the Bar of the State of California and a partner
3 with Faegre Baker Daniels LLP, attorneys of record for Defendants Biomet Inc.; Biomet
4 Orthopedics, LLC; Biomet Manufacturing Corp.; and Biomet U.S. Reconstruction, LLC
5 (collectively, “Biomet”). I make this declaration based upon personal knowledge and, if
6 called upon to do so, I could and would so testify.

7 2. I make this declaration in support of my Verified Petition and Designation
8 of Local Counsel in the above referenced matter, pursuant to LR IA 11-2(h)(2).

9 3. Faegre Baker Daniels is national products liability counsel for Biomet; the
10 law firm does not have an office in Nevada.

11 4. In addition to this single plaintiff products liability case, Faegre Baker
12 Daniels represents Biomet in hundreds of other cases across the country alleging claims
13 against Biomet’s M2a hip replacement system.

14 5. On October 2, 2012, the Biomet M2a cases were consolidated and
15 centralized in the United States District Court for the Northern District of Indiana in the
16 South Bend Division, where Judge Robert L. Miller, Jr. presides over *In Re: Biomet M2a*
17 *Magnum Hip Implant Products Liability Litigation* (MDL 2391), cause number: 3:12-
18 MD-2391 (“Biomet M2a Magnum MDL”).

19 6. Beginning in 2018, Judge Miller remanded and transferred groups of cases
20 within the MDL to their local federal courts throughout the country, including those in
21 Nevada. On February 22, 2019 and March 11, 2019, Judge Miller remanded and
22 transferred additional cases out of the MDL. Additional cases are expected to be
23 remanded and transferred to local federal courts through 2019.

24 7. Faegre Baker Daniels LLP represents Biomet in the Biomet M2a Magnum
25 MDL, in the M2a remanded and transferred cases throughout the country, and in state
26 and federal court cases that were never centralized in the Biomet M2a Magnum MDL.

27 8. Tarifa Laddon and Theodore O’Reilly of Faegre Baker Daniels LLP
28 represent Biomet in products liability cases such as this one, as well in many of the

1 Biomet M2a Magnum cases, and have thus far appeared in five remanded and transferred
2 Biomet M2a Magnum MDL cases before this Court in which their verified petitions have
3 been granted:

Case Name	Case Number	Remand Date
Mitchell Gonzalez v. Biomet, Inc., et al.	2:18-cv-01744-GMN	September 6, 2018
Randall Hix v. Biomet, Inc., et al.	3:18-cv-00437-RCJ-WGC	September 6, 2018
Edward George v. Biomet, Inc., et al	2:18-cv-02394-APG-VCF	December 12, 2018
Veronica Gonzalez v. Biomet, Inc., et al	2:19-cv-00043-RFB-VCF	December 12, 2018
Rebecca Franks v. Biomet, Inc., et al	2:16-cv-00264-APG-PAL	January 2, 2019

12
13 9. On February 22, 2019 and March 11, 2019, Judge Miller remanded and
14 transferred four additional cases to this Court. Tarifa Laddon and Theodore O'Reilly of
15 Faegre Baker Daniels LLP will also seek to appear in those cases on behalf of Biomet, as
16 well as in future remanded, transferred, and filed Biomet cases before this Court.

17 10. For purposes of efficiency, Biomet requests that the Verified Petitions and
18 Designations of Counsel for Tarifa Laddon and Theodore O'Reilly be granted.

19 I declare under the penalty of perjury and the laws of the State of California and
20 Nevada that the foregoing is true and correct.

21 Executed this 18th day of March, 2019, at Los Angeles, California.

22
23 /s/ Tarifa B. Laddon
24 Tarifa B. Laddon