

IN THE CIRCUIT COURT FOR PRINCE GEORGE'S COUNTY, MARYLAND

MOIRA JACKSON, *et al.*

Plaintiffs,

v.

DEPUY ORTHOPAEDICS, INC., *et al.*

Defendants.

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Case No.: CAL10-32147

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**AMENDED NOTICE OF DEPOSITION FOR CORPORATE  
DESIGNEE[S] OF DEPUY ORTHOPAEDICS, INC.**

PLEASE TAKE NOTICE that the Plaintiffs, pursuant to the Maryland Rules of Procedure, pursuant to Maryland Rule 2-412, will take the deposition of Depuy Orthopaedics, Inc., through its designated representative(s) upon oral examination, on Thursday, May 26, 2011, at 9:00 a.m. at the Law Offices of Barnes & Thornburg, LLP, 11 South Meridian Street, Indianapolis, Indiana 46204, for the purpose of discovery and/or for use at trial. The deposition(s) may also be videotaped for use at trial. Said deposition(s) is to be taken before a duly authorized officer and to continue from day to day until completed.

**SUBJECT MATTER AREAS**

(1) The e-mail systems utilized by DePuy Orthopaedics, Inc. and its distributors from 2004 to present.

(2) The preservation of, storage of, access to, methods of searching, and searches conducted of DePuy Orthopaedics, Inc. and its distributors' email from 2004 to present.

SHADOAN, MICHAEL  
& WELLS, LLP

A Registered Limited Liability Partnership

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(3) All document "hold notices" issued regarding the ASR Acetabular Implant and the status of those notices.

(4) The preservation of, storage of, access to, methods of searching, and searches conducted of memoranda, correspondence, documents, and files relating to the failure or recall of ASR Acetabular Implants.


(5) The preservation of, storage of, access to, methods of searching, and searches conducted of memoranda, correspondence, documents, and files relating to criticism regarding the design of ASR Acetabular Implants.

(6) The roles played by each Johnson & Johnson subsidiary in the design, testing, manufacture, instruction, promotion, sale, distribution, post-sales support, and monitoring of the ASR Acetabular Implant.

(7) The statistics by calendar year of the number of ASR Acetabular Implants sold, implanted, revised, or with revisions scheduled in the United States and in each country in which they were sold. In the event statistics regarding the ASR Acetabular Implant are not tracked by county, the statistics for the smallest sales territory larger than a country.

**SHADOAN, MICHAEL & WELLS, LLP.**

By: \_\_\_\_\_

  
Gregory K. Wells  
108 Park Avenue  
Rockville, Maryland 20850  
(301) 762-5150  
Attorney for Plaintiffs

**CERTIFICATE OF SERVICE**

I Hereby Certify that on this 2<sup>nd</sup> day of May 2011, that a copy of Plaintiffs' Amended Notice of Deposition for Corporate Designee[s] of DePuy Orthopaedics, Inc., was mailed first class, postage prepaid to:

Paul F. Strain, Esquire  
John A. McCauley, Esquire  
Venable LLP  
750 E. Pratt Street, Suite 900  
Baltimore, Maryland 21202

Lauren D. Godfrey, Esquire  
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