

IN THE SIXTH JUDICIAL CIRCUIT OF THE STATE OF FLORIDA
IN AND FOR PINELLAS COUNTY, FLORIDA

JANINE BARNES
and JULIE FOURNIER

Plaintiff,

v.

CASE NO. 11-04262-CI-21

BAYSIDE ORTHOPAEDICS, INC.,

Defendant.

PLAINTIFF JANINE BARNES' FIRST REQUEST FOR ADMISSIONS TO DEFENDANT

COMES NOW the Plaintiff, JANINE BARNES, by and through her undersigned attorney, and pursuant to Florida Rule of Civil Procedure 1.370, makes the following requests for admissions to Defendant BAYSIDE ORTHOPAEDICS, INC.:

1. From 1/1/2009 to 1/31/2011, Bayside Orthopaedics, Inc. was responsible for making sales calls on George Markovich, M.D. and representing DePuy Orthopaedics, Inc.
2. From 1/1/2009 to 1/31/2011, Bayside Orthopaedics, Inc. was responsible for completing sales of DePuy Orthopaedics, Inc. products for use in the patients of George Markovich, M.D.
3. From 1/1/2009 to 1/31/2011, Bayside Orthopaedics, Inc. received a commission for sales of products of DePuy Orthopaedics, Inc. for implantation into the patients of George Markovich, M.D.
4. Bayside Orthopaedics, Inc. received a commission for the sale of the DePuy ASR Acetabular Cup implanted in Janine Barnes on July 6, 2009.
5. Bayside Orthopaedics, Inc. received a commission for the sale of the DePuy ASR Taper Sleeve Adaptor implanted in Janine Barnes on July 6, 2009.
6. Bayside Orthopaedics, Inc. received a commission for the sale of the DePuy ASR Uni Femoral Implant implanted in Janine Barnes on July 6, 2009.
7. Bayside Orthopaedics, Inc. received a commission for the sale of the DePuy S-ROM Total Hip System Femoral Stem implanted in Janine Barnes on July 6, 2009.
8. Bayside Orthopaedics, Inc. received a commission for the sale of the DePuy S-ROM Total Hip System ZTT Proximal Sleeve implanted in Janine Barnes on July 6, 2009.

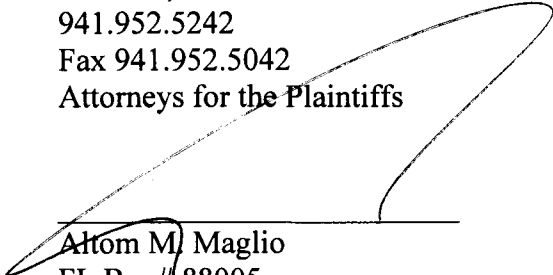
9. Bayside Orthopaedics, Inc. profited from the sale of the DePuy ASR Acetabular Cup, the DePuy ASR Taper Sleeve Adaptor, DePuy ASR Uni Femoral Implant, the DePuy S-ROM Total Hip System Femoral Stem and the DePuy S-ROM Total Hip System ZTT Proximal Sleeve implanted in Janine Barnes on July 6, 2009.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing has been furnished to EDWARD W. GERECKE, ESQUIRE and DAVID W. WALZ, ESQUIRE, via UPS postage prepaid to CARLTON FIELDS, P.A. Corporate Center Three at International Plaza, 4221 W. Boy Scout Boulevard, Suite 1000, Tampa, Florida, 33607, and via **electronic mail**, at egerecke@carltonfields.com and dwalz@carltonfields.com, this the 22nd day of June, 2011.

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