IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

IN RE: C.R. BARD, INC., PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION

MDL NO. 2187

THIS DOCUMENT RELATES TO ALL CASES

PRETRIAL ORDER # 27
(Amended Plaintiff Fact Sheet)

1. Plaintiffs' Fact Sheets.

a. As previously noted in PTO #9, the parties have agreed upon the use of a form Plaintiff Fact Sheet ("PFS"). Subsequent to PTO #9 being entered, MDL 2187 was expanded to include pelvic mesh products manufactured or sold by C. R. Bard, Inc. in addition to the Avaulta® line of products listed on the original PFS. This expansion necessitated an amended PFS, attached to this Order as Exhibit A. The amended PFS attached to this Order shall apply to each case that becomes part of MDL 2187 by virtue of being filed in, removed to, or transferred to this Court after the date of this Order. Plaintiffs in cases filed and made a part of MDL 2187 after the entry of PTO #9 (June 7, 2011) but prior to the entry of this Order who have not yet completed a PFS shall complete the amended PFS attached to this Order if the claims relate to products not included on the original PFS.

b. In cases filed after the date of this Order, each Plaintiff shall submit a completed PFS within sixty (60) days of filing suit.[1]

[1] If a Plaintiff is suing in a representative or derivative capacity, the PFS shall be completed by the person with the legal authority to represent the estate or person under legal disability. Plaintiff spouses with loss of consortium claims shall also sign the PFS, attesting that the

c. A completed PFS shall be considered interrogatory answers under Fed. R. Civ. P. 33, responses to requests for production under Fed. R. Civ. P. 34, and will be governed by the standards applicable to written discovery under Federal Rules 26 through 37. The interrogatories and requests for production in the PFS shall be answered without objection as to the question as posed in the agreed upon PFS, however Plaintiff may assert objections for that individual plaintiff to specific questions where appropriate, and Defendants reserve all rights to challenge such objections. This section does not prohibit a Plaintiff from withholding or redacting information based upon a recognized privilege. If information is withheld or redacted on the basis of privilege, Plaintiff shall provide Defendants with a privilege log simultaneously with submission of the PFS. If a dispute arises concerning the completeness or adequacy of a Plaintiff's response to any request contained in the PFS, this Section shall not prohibit the Plaintiff from asserting that his or her response is adequate, and Defendants reserve all rights and objections.

d. Every Plaintiff is required to provide Defendants with a PFS that is substantially complete in all respects, answering every question in the PFS even if a Plaintiff can only answer the question in good faith by indicating "not applicable" or "I don't know."

e. Authorizations for the release of records. Plaintiffs shall provide agreed upon authorizations for the release of medical, insurance, employment, Medicare/ Medicaid, Social Security. In the event that an institution, agency, or medical provider to whom any authorization is presented refuses to provide records in response to the authorizations Plaintiff provides, the parties' vendor will notify the parties (according to its contract with the parties) and

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responses made to the loss of consortium claim questions in the PFS are true and correct to the best of his knowledge, information and belief, formed after due diligence and reasonable inquiry.

the individual Plaintiff's attorney shall attempt to resolve the issue with the provider, such that the necessary records are promptly provided. The parties' vendor will obtain records and post them to a secure database, accessible to the appropriate individuals for all parties, according to the parties' contract with the vendor and the parties' agreement for a 10 day grace period for Plaintiffs to review documents in advance of such posting.

f. Plaintiffs shall provide dated authorizations, applicable for one year from the date of execution by Plaintiff. Plaintiffs shall have the responsibility of obtaining new releases from any Plaintiff whose authorizations are more than eleven months old and will have the responsibility to promptly obtain new releases for any Plaintiff for whom a provider objects to the age of the authorization within fifteen (15) days of notice of such objection by a provider. In the event that dated authorizations become an impediment to prompt obtaining of records generally, the parties will meet and confer to discuss the provision and protection of undated authorizations. Signed authorizations constitute permission for the parties' vendor to obtain records from records custodians.

g. Any Plaintiff who fails to comply with the PFS obligations under this Order may, for good cause shown, be subject to sanctions, to be determined by the Court, upon motion of the Defendants.

h. If a Plaintiff fails to timely submit a PFS, or if Defendants receive a PFS in the allotted time but the PFS is not substantially complete, Defendants' Lead Counsel shall send a deficiency letter by facsimile and U.S. mail to Plaintiffs' Liaison Counsel and Plaintiffs' individual representative counsel, identifying the purported deficiencies. Plaintiff shall have twenty (20) days from receipt of that letter to serve a PFS that is substantially complete in all respects. This letter shall include sufficient detail for the parties to meet and confer regarding the

alleged deficiencies. Should a Plaintiff fail to cure the deficiencies identified and fail to provide responses that are substantially complete in all respects, Defendant may move under Federal Rule of Civil Procedure 37 for appropriate relief. Any such filing shall be served on Plaintiffs' Liaison Counsel and the Plaintiffs' individual representative counsel, with any response to such filing to be submitted within ten (10) days following the date of service. Any such filing should set forth the efforts the Defendants made to meet and confer regarding the alleged deficiencies in the PFS and failure to cure.

2. Defendant's Fact Sheet.

a. The parties have agreed upon the use of a form Defendant Fact Sheet ("DFS"), attached to PTO #9. No changes have been made to the DFS and it shall continue to apply to every case within MDL 2187, and in all other cases that become part of this MDL by virtue of being filed in, removed to, or transferred to this Court.

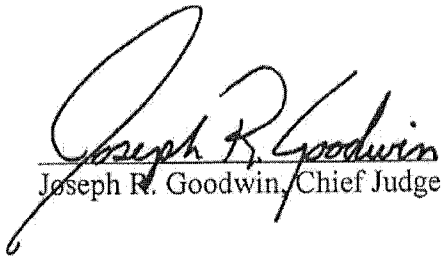
b. All obligations and deadlines related to completion of a DFS as outlined in Section 2 of PTO #9 remain in full force and effect and are incorporated herein.

IT IS SO ORDERED.

The court **DIRECTS** the Clerk to file a copy of this order in 2-10-md-2187 and it shall apply to each member Bard-related case previously transferred to, removed to, or filed in this district, which includes counsel in all member cases up to and including civil action number 2-12-cv-00361. In cases subsequently filed in this district, a copy of the most recent pretrial order will be provided by the Clerk to counsel appearing in each new action at the time of filing of the complaint. In cases subsequently removed or transferred to this court, a copy of the most recent pretrial order will be provided by the Clerk to counsel appearing in each new action upon removal or transfer. It shall be the responsibility of the parties to review and abide by all pretrial

orders previously entered by the court. The orders may be accessed through the CM/ECF system or the court's website at www.wvsd.uscourts.gov.

ENTER: February 14, 2012



Joseph R. Goodwin, Chief Judge

EXHIBIT "A"

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

IN RE: C.R. BARD, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

MDL No. 2187

THIS DOCUMENT RELATES TO ALL CASES

Plaintiff:

_____

Name of Plaintiff

PLAINTIFF FACT SHEET

Each plaintiff who allegedly suffered injury as a result of a pelvic mesh product manufactured or sold by C. R. Bard, Inc. must complete this Plaintiff Fact Sheet. In completing this Fact Sheet, you are under oath and must answer every question and provide information that is true and correct to the best of your knowledge. If you cannot recall all of the details requested, please provide as much information as you can and then state that your answer is incomplete and explain why as appropriate. If you select an "I Don't Know" answer, please state all that you do know about that subject. If any information you need to complete any part of the Fact Sheet is in the possession of your attorney, please consult with your attorney so that you can fully and accurately respond to the questions set out below. If you are completing the Fact Sheet for someone who cannot complete the Fact sheet herself, please answer as completely as you can.

The Fact Sheet shall be completed in accordance with the requirements and guidelines set forth in the applicable Case Management Order. A completed Fact Sheet shall be considered interrogatory answers pursuant to Fed. R. Civ. P. 33 and 34 and will be governed by the standards applicable to written discovery under Fed. R. Civ. P. 26 through 37. You must supplement your responses if you learn that they are incomplete or incorrect in any material respect. The questions and requests for production contained in the Fact Sheet are non-objectionable and shall be answered without objection. This Fact Sheet shall not preclude Defendants from seeking additional documents and information on a reasonable, case-by-case basis pursuant to the Federal Rules of Civil Procedure and as permitted by the applicable Case Management Order.

In filling out this form, please use the following definition: "healthcare provider" means any doctor, physician, surgeon, pharmacist, hospital, clinic, center, physician's office, infirmary, medical or diagnostic laboratory, or other facility that provides medical care or advice, and any pharmacy, x-ray department, radiology department, laboratory, physical therapist or physical therapy department, rehabilitation specialist, chiropractor, or other persons or entities involved in the diagnosis, care and/or treatment of you.

In filling out this form, the terms "You" or "Your" refer to the person who received pelvic mesh product(s) manufactured or sold by C. R. Bard and who is identified in Question I.1 (a) below.

To the extent that the form does not provide enough space to complete your responses or answers, please attach additional sheets as necessary.

I. BACKGROUND INFORMATION

1) Please state:

   a. Full name of the person who received the pelvic mesh product(s), including maiden name:

   _____

   b. Full name of the person completing this form, if different from the person listed in 1 (a) above, and the relationship of the person completing this form to the person listed in 1 (a) above: _____

   c. The name and address of your primary attorney:_____

2) Your Social Security Number: _____

3) Your date of birth: _____

4) Your current residence address:_____

   If you have lived at this address for less than 10 years, provide each of your prior residence addresses from 2000 to the present:

Prior Address	Dates You Lived At This Address

5) Have you ever been married? **Yes** ___ **No** ___

   If yes, provide the names and addresses of each spouse and the inclusive dates of your marriage to each person.

   _____

   _____

6) Do you have children? **Yes** ___ **No** ___

If Yes, please provide the following information with respect to each child:

Full Name of Child	Date of Birth	Home Address (if different from yours)	Whether Biological/Adopted

7) Identify the name and age of any person who currently resides with you and their relationship to you:

_____

_____

_____

8) Identify all secondary and post-secondary schools you attended, starting with high school and please provide the following information with respect to each:

Name of School	Address	Dates of Attendance	Degree Awarded	Major or Primary Field

9) Please provide the following information for your employment history over the past 10 years up until the present:

Employer Name	Addresses	Job Title/ Description of Duties	Dates of Employment	Salary/Rate of Pay

10) Have you ever served in any branch of the military? **Yes** ___ **No** ___

If Yes, please provide the following information:

a. Branch and dates of service, rank upon discharge and the type of discharge you received: _____
_____

b. Were you discharged from the military at any time for any reason relating to your medical, physical, or psychiatric condition? **Yes** ___ **No** ___

If Yes, state what that condition was: _____
_____

11) Within the last ten years, have you been convicted of, or plead guilty to, a felony and/or crime of fraud or dishonesty? **Yes** ___ **No** ___

If Yes, please set forth where, when and the felony and/or crime:
_____
_____

II. CLAIM INFORMATION

1) Please complete the following chart for each implanted Bard pelvic mesh product. Insert additional lines as necessary.

Pelvic Mesh Product and lot number (if sticker affixed, so indicate)	Date and Location of Implant	Reason for Implant	Implanting Doctor and Address
Product No. 1:			
Product No. 2:			
Product No. 3:			

2) For each pelvic mesh product identified above, describe your understanding of the medical condition for which you received the pelvic mesh product(s): _____

_____

_____

3) For each Bard pelvic mesh product identified above, indicate if, prior to implantation, you received any written and/or verbal information or instructions, including any risks or complications that might be associated with the use of the product(s)? **Yes** ___ **No** ___ **Don't Know** ___

If Yes:

a. Provide the date you received the written and/or verbal information or instructions:

_____

_____

b. Identify by name and address the person(s) who provided the information or instructions: _____

_____

c. What information or instructions did you receive? _____

_____

_____

d. If you have copies of the written information or instructions you received, please attach copies to your response.

4) For each Bard pelvic mesh product(s) that remains implanted in you:

a. Has any doctor recommended removal of the pelvic mesh product(s)?
Yes ___ No ___

If Yes, Identify by name and address the doctor who recommended removal and state your understanding of why the doctor recommended removal:

_____

5) Have any of the Bard pelvic mesh product(s) been removed, in whole or in part?
Yes ___ No ___ Don't Know ___

If Yes, for each pelvic mesh product removed provide:

a. On what date, where and by whom (doctor) was the pelvic mesh product(s), or any portion of it, removed? _____

b. Explain why you consented to have the pelvic mesh product(s), or any portion of it, removed?_____

c. Does any medical treater, physician or anybody else on your behalf have possession of any portion of the pelvic mesh product® that was previously implanted in you and removed? **Yes ___ No ___ Don't Know ___**

If Yes, please state name and address of the person or entity having possession of same. _____

6) Do you claim that you suffered bodily injuries as a result of the implantation of any Bard pelvic mesh product(s)? **Yes ___ No ___**

If Yes:

a. Describe the bodily injuries, including any emotional of psychological injuries, that you claim resulted from the implantation of the pelvic mesh product(s).

_____
_____
_____
_____

b. When is the first time you experienced symptoms of any of the bodily injuries you claim in your lawsuit to have resulted from the pelvic mesh product(s)?

_____

_____

_____

_____

c. When did you first attribute these bodily injuries to the pelvic mesh product(s)?

_____

_____

_____

_____

d. To the best of your knowledge and recollection, please state approximately when you first saw a health care provider for each of those bodily injuries you claim to have experienced relating to the pelvic mesh product(s):

_____

_____

_____

_____

e. Are you currently experiencing symptoms related to your claimed bodily injuries? **Yes** ___ **No** ___

If Yes, please describe your current symptoms in detail

_____

_____

f. Are you currently seeing, or have you ever seen a doctor or healthcare provider for each of the bodily injuries or symptoms listed above? **Yes** ___ **No** ___

If Yes, please list all doctors you have seen for treatment of any of the bodily injuries you have listed above.

Provider Name and Address	Condition Treated	Approximate Dates of Treatment

g. Were you hospitalized at any time for the bodily injuries you listed above?
Yes ___ No ___

If Yes, please provide the following:

Hospital Name and Address	Condition Treated	Approximate Dates of Treatment

7) Other than the Bard pelvic mesh product(s) that are the subject of your lawsuit, have you been implanted with any other pelvic mesh products? **Yes ___ No ___**

If Yes, please provide the following information:

a. Product Name(s): _____
_____

b. Date of implantation procedure(s) and name and address of implanting doctor(s):
_____

c. Condition(s) sought to be treated through placement of the device(s):
_____

_____

d. Whether the product(s) remain implanted inside of you today?
Yes ___ No ___

8) Are you making a claim for lost wages or lost earning capacity?

Yes ___ No ___

If Yes, state the annual gross income you derived from your employment for each year, beginning five years prior to the implantation of the pelvic mesh product(s) until the present:

_____

_____

9) Are you making a claim for lost out-of-pocket expenses?

Yes ___ No ___

If Yes, please identify and itemize all out-of-pocket expenses you have incurred**:**

_____

_____

10) Has anyone filed a loss of consortium claim in connection with your lawsuit regarding the pelvic mesh product(s)?

Yes ___ No ___

If Yes, identify by name and address the person who filed the loss of consortium claim, state the relationship of that person to you, and state the nature of the claim:

_____

_____

_____

11) Please indicate whether the consortium plaintiff is alleging any of the claimed damages set forth below and itemize the alleged damages/expenses:

Claims	Yes/ No	Itemized Damages/Expenses
Loss of services of spouse		**Not applicable**
Impaired sexual relations		**Not applicable**
Lost wages/ lost earning capacity		
Lost out-of-pocket expenses		
Physical injuries		**Not applicable**
Psychological Injuries/ Emotional Injuries		**Not applicable**
Other		**Not applicable**

12) Please list the name and address of any healthcare providers the consortium plaintiff has seen for treatment for any physical, emotional, or psychological injuries or symptoms alleged to be related to the loss of consortium claim.

_____

_____

_____

_____

_____

13) Have you or anyone acting on your behalf had any communication, oral or written, with any of the defendants or their representatives, other than your attorneys?

Yes ___ No ___ Don't Know ___

If Yes, set forth the date of the communication, the method of communication, the name of the person with whom you communicated, and the substance of the communication between you and any defendants or their representatives:

_____

_____

III. MEDICAL BACKGROUND

1) Provide your current age: _____ Height _____ Weight _____

2) At the time you received each pelvic mesh product(s), please state:

Your age _____ Your approximate weight _____

3) State number of vaginal births you have had? _____

4) State the number of cesarean section births you have had? _____

5) In chronological order, list any and all surgeries, procedures, or hospitalizations you had in the 10 year period **BEFORE** implantation of the pelvic mesh product(s); identifying by name and address the doctor(s), hospital(s) or other healthcare provider(s) involved with each surgery or procedure; and providing the approximate date(s) for each. Insert additional rows as necessary.

Doctor or Healthcare Provider Involved (including address)	Description of Surgery Hospitalization	Approximate. Date

6) In chronological order, list any and all surgeries, procedures, or hospitalizations you had **AFTER** the implantation of the pelvic mesh product(s); identifying by name and address the doctor(s), hospital(s) or other healthcare provider(s) involved with each surgery or procedure; and provide the approximate date(s) for each. Insert additional rows as necessary.

Doctor or Healthcare Provider Involved (including address)	Description of Surgery/ Hospitalization	Approximate Date

7) To the extent not already provided in the charts above, provide the name, address, and telephone number of every doctor, hospital, or other health care provider from which you have received medical advice and/or treatment for the past **10 years**. Insert additional rows as necessary.

Name and Specialty	Address	Approximate Dates/Years of Visits

Name and Specialty	Address	Approximate Dates/Years of Visits

8) Please describe your physical activities associated with daily living, physical fitness, household tasks, and employment-related activities *before* the implantation of each pelvic mesh product.

_____

_____

9) Please describe your physical activities associated with daily living, physical fitness, household tasks, and employment-related activities *after* the implantation of the pelvic mesh product(s).

_____

_____

10) To the best of your knowledge, you have suffered from any of the following:

Medical Condition		Sought treatment for?	Indicate whether condition occurred pre-implant, post-implant or both (explain, if necessary)
Adhesions	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Bleeding or Clotting Disorders If **Yes**, please specify disorder:	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___

Bowel Obstruction	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Bowel Perforation	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Cancer If **Yes**, please specify type:	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Chronic Constipation	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Collagen Disorder/Deficiency	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Connective Tissue Disorder If **Yes**, please specify disorder:	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Crohn's Disease, Irritable Bowel Syndrome, Ulcerative Colitis, or Chronic Diarrhea If **Yes**, please specify which condition and treatment prescribed:	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Cystocele	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Diabetes	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Diverticulitis	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Dyspareunia	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Enterocele	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___

Fistulas	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Hernias	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Hypertension or High Blood Pressure	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Hypotension or Low Blood Pressure	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Immune System Disease or Dysfunction including HIV/AIDS If **Yes**, please specify condition:	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Malnutrition	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Muscle or Muscle-Wasting Disorder If **Yes**, please specify disorder:	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Neuromuscular Disease or Disorder If **Yes**, please specify disorder:	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Obesity	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Pelvic Trauma If **Yes**, please describe trauma:	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Pelvic Tumors or Fibroids	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___
Peritonitis/Sepsis	**Yes** ___ **No** ___	**Yes** ___ **No** ___	**Pre** ___ **Post** ___

Rectocele	**Yes ___** **No ___**	**Yes ___** **No ___**	**Pre ___ Post ___**
Recurrent or Chronic Vaginal or Bladder Infections If **Yes**, please specify location and nature of infections:	**Yes ___** **No ___**	**Yes ___** **No ___**	**Pre ___ Post ___**
Recurrent Vaginal Pain If **Yes**, please describe the nature of pain experienced:	**Yes ___** **No ___**	**Yes ___** **No ___**	**Pre ___ Post ___**
Urinary Incontinence	**Yes ___** **No ___**	**Yes ___** **No ___**	**Pre ___ Post ___**
Urinary Retention	**Yes ___** **No ___**	**Yes ___** **No ___**	**Pre ___ Post ___**
Uterine Prolapse	**Yes ___** **No ___**	**Yes ___** **No ___**	**Pre ___ Post ___**
Vaginal Vault Prolapse	**Yes ___** **No ___**	**Yes ___** **No ___**	**Pre ___ Post ___**
Wound Healing Problems If **Yes**, please explain:	**Yes ___** **No ___**	**Yes ___** **No ___**	**Pre ___ Post ___**
Any other disease of the gut, intestines, or bowels If **Yes**, please specify condition (s):	**Yes ___** **No ___**	**Yes ___** **No ___**	**Pre ___ Post ___**

* * * * * * * * * * * * * * *

THE FOLLOWING QUESTIONS ARE CONFIDENTIAL AND SUBJECT TO THE PROTECTIVE ORDER APPLICABLE TO THIS CASE.

a) **Were you diagnosed with and/or treated for Sexually Transmitted Diseases for the five year period prior to the implantation of the pelvic mesh product(s) through the present?**

Yes ___ No ___

If Yes, specify the disease, date of onset, medication/treatment, treating physician and current status of condition:

_____

_____

b) **Have you been diagnosed with and/or treated for any alcohol or chemical dependency for the one year prior to the implantation of the pelvic mesh product(s) through the present? Yes ___ No ___**

If Yes, specify type and time period of dependency, type of treatment received, name of treatment provider, and current status of condition:

_____

_____

c) **Have you experienced, been diagnosed with or been treated for any mental health conditions including depression, anxiety or other emotional or psychiatric disorders in the 5 year period before implantation of the pelvic mesh product(s) through the present?**

Yes ___ No ___

If Yes, specify condition, date of onset, medication/treatment, treating physician and current status of condition:

_____

_____

* * * * * * * * * * * * * * *

11) Have you experienced menopause? **Yes** ___ **No** ___

If Yes, at what age did it begin? _____

12) Have you undergone vaginal estrogen therapy, hormone therapy, or systemic estrogen replacement therapy (ERT)? **Yes** ___ **No** ___

If Yes, please provide the type of therapy you received, date(s) of the therapy, and the name and address of the healthcare provider providing the therapy.

_____

_____

13) Do you now or have you ever smoked tobacco products? **Yes** ___ **No** ___

If Yes:

a) How long have/did you smoke?

_____

_____

14) List each prescription medication you have taken **for more than 3 months at a time, within the last 5 years prior to implant to present,** giving the name and address of the pharmacy where you received/filled the medication, the reason you took the medication, and the approximate dates of use.

Medication and Dosage	Pharmacy (Name and Address)

IV. INSURANCE INFORMATION

1) Provide the following information for any past or present medical insurance coverage within the last 10 years:

Insurance Company (Name and Address)	Policy Number	Name of Policy Holder/Insured (if different than you)	Approx. Dates of Coverage

2) Have you ever been denied life insurance for reasons relating to your health?

Yes ___ No ___ Don't Know ___

If Yes, please state when the denial occurred, the name of the life insurance company, and the company's reason for denial: _____

_____

_____

3) To the best of your knowledge, have you been approved to receive or are you receiving Medicare benefits due to age, disability, condition or any other reason or basis?

Yes ___ No ___

If Yes, please specify the following:

a) The date on which you first became eligible: _____

[Please note: if you are not currently a Medicare-eligible beneficiary, but become eligible for Medicare during the pendency of this lawsuit, you must supplement your response at that time. This information is necessary for all parties to comply with Medicare regulations. See 42 U.S.C. 1395y(b)(8), also known as Section 111 of the Medicare, Medicaid and SCHIP Extension Act of 2007 and 42 U.S.C. 1395y(b)(2) also known as the Medicare Secondary Payer Act.]

V. PRIOR CLAIM INFORMATION

1) Have you filed a lawsuit or made a claim in the last 10 years, other than in the present suit relating to any bodily injury?

Yes ___ **No** ___

If Yes, please specify the following:

a) Court in which suit/claim filed or made:_____

b) Case/Claim Number:_____

c) Nature of Claim/Injury:_____

2) Have you applied for workers' compensation (WC), Social Security disability (SSI or SSD) benefits, or other state or federal disability benefits within the past 10 years?

Yes ___ **No** ___

If Yes, please specify the following:

a) Date (or year) of application: _____

b) Type of benefits sought _____

c) Agency/Insurer from which you sought the benefits:_____

d) The nature of the claimed injury/disability: _____

e) Whether the claim was accepted or denied: _____

_____

VI. FACT WITNESSES

1) Please identify all persons who you believe possess information concerning your injury(ies) and current medical conditions, other than your healthcare providers, and please state their name address and his/her/their relationship to you:

Name	Address	Relationship to You	Information you Believe Person Possesses

VII. IDENTIFICATION OF DOCUMENTS AND OTHER ELECTRONICALLY STORED INFORMATION

For the period beginning three years prior to implantation of the pelvic mesh product(s) to present, please identify all research, including on-line research, you have conducted regarding the subjects of this litigation, including the implantation of the pelvic mesh product(s), the injuries and/or damages you claim resulted from the implantation of the pelvic mesh product(s), or your medical or physical condition. Identify date, time, and source, including any websites visited. Research conducted to understand the legal and strategic advice of your counsel is not considered responsive to this request.

VIII. DOCUMENT REQUESTS

1) **RELEASES.**

NOTE: Please sign and attach to this Fact Sheet the authorizations for the release of records appended hereto.

2) **DOCUMENTS.** State whether you have any of the following documents in your possession, custody, and/or control. If you do, please provide a true and correct copy of any such documents with this completed Fact Sheet.

a) If you were appointed by a court to represent the plaintiff in this lawsuit, produce any documents demonstrating your appointment as such.

i. Not Applicable _____

ii. The documents are attached _____ [OR] I have no documents _____

b) If you represent the estate of a deceased person in this lawsuit, produce a copy of the decedent's death certificate and autopsy report (if applicable).

i. Not Applicable _____

ii. The documents are attached _____ [OR] I have no documents _____

c) Produce any communications (sent or received) in your possession, which shall include materials accessible to you from any computer on which you have sent or received such communications, concerning the pelvic mesh product(s) or subject litigation, including but not limited to all letters, e-mails, blogs, Facebook posts, tweets, newsletters, etc. sent or received by you. Research conducted to understand the legal and strategic advice of your counsel is not considered responsive to this request.

i. Not Applicable _____

ii. The documents are attached _____ [OR] I have no documents_____

d) Produce all documents (including journal entries, lists, memoranda, notes, diaries), photographs, video, DVDS or other media, including all copies, discussing or referencing the subjects of this litigation including the pelvic mesh product(s), the injuries and/or damages you claim resulted from the pelvic mesh product(s), or evidencing your physical condition from three years prior to the implantation of the pelvic mesh product(s) to present, including but not limited to the injuries for which you claim relief in this lawsuit. Research conducted to

understand the legal and strategic advice of your counsel is not considered responsive to this request.

i. Not Applicable _____

ii. The documents are attached _____ [OR] I have no documents _____

e) Produce any pelvic mesh product packaging, labeling, advertising, or any other pelvic mesh product product-related items in your possession, custody or control.

i. Not Applicable _____

ii. The documents are attached _____ [OR] I have no documents _____

f) Produce all documents concerning any communication between you and the Food and Drug Administration (FDA) or between you and any employee or agent of the Defendants, regarding the pelvic mesh product(s) at issue, except as to those communications which are attorney client/work product privileged.

i. Not Applicable _____

ii. The documents are attached _____ [OR] I have no documents _____

g) Produce all documents in your possession, custody or control evidencing or relating to any correspondence or communication between C. R. Bard, Inc., Covidien or Sofradim (or any of its related companies or divisions) and any of your doctors, healthcare providers, and/or you relating to the pelvic mesh product(s), except as to those communications which are attorney client/work product privileged.

i. Not Applicable _____

ii. The documents are attached _____ [OR] I have no documents _____

h) Produce any and all documents in your possession, custody or control reflecting, describing, or in any way relating to any instructions or warnings you received prior to implantation of any pelvic mesh product(s) concerning the risks and/or benefits of your surgery, including but not limited to any risks and/or benefits associated with the pelvic mesh product(s).

i. Not Applicable _____

ii. The documents are attached _____ [OR] I have no documents _____

i) Produce any and all documents reflecting the model number and lot number of the pelvic mesh product(s) you received.

i. Not Applicable _____

ii. The documents are attached _____ [OR] I have no documents _____

j) If you underwent surgery to explain in whole or in part the pelvic mesh product(s) that you received: produce any and all documents in your possession, custody or control aside from documents that may have been generated by experts retained by your counsel for litigation purposes, relating to any evaluation of the pelvic mesh product(s) and any other material that was (were) surgically removed from you.

i. Not Applicable _____

ii. The documents are attached _____ [OR] I have no documents _____

k) If you claim lost wages or lost earning capacity, copies of your federal and state tax returns for the two years prior to implantation of the pelvic mesh product(s) to the present.

i. Not Applicable _____

ii. The documents are attached _____ [OR] I have no documents _____

l) All documents in your possession, custody or control concerning payment by Medicare on the injured party's behalf relating to the injuries claimed in this lawsuit, including but not limited to Interim Conditional Payment summaries and/or estimates prepared by Medicare or its representatives regarding payments made on your behalf for medical expenses relating to the subject of this litigation.

i. Not Applicable _____

ii. The documents are attached _____ [OR] I have no documents _____

[Please note: if you are not currently a Medicare-eligible beneficiary, but become eligible for Medicare during the pendency of this lawsuit, you must supplement your response at that time. This information is necessary for all parties to comply with Medicare regulations. See 42 U.S.C. 1395y(b)(8), also known as Section 111 of the Medicare, Medicaid and SCHIP Extension Act of 2007 and 42 U.S.C. 1395y(b)(2) also known as the Medicare Secondary Payer Act.]

SWORN DECLARATION

I, _____, declare under penalty of perjury that the facts contained in the foregoing Plaintiff Fact Sheet is true and correct to the best of my knowledge, information and belief.

Dated: _____ _____

Signature of Plaintiff

I, _____, declare under penalty of perjury that all of the information provided regarding my loss of consortium claim is true and correct to the best of my knowledge, information and belief.

Dated: _____ _____

Signature of Consortium Plaintiff

APPENDIX "A"

(Authorization Forms)