

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

**IN RE: PROPULSID PRODUCTS** : **MDL NO. 1355**  
**LIABILITY LITIGATION** :  
: **SECTION: L**  
**THIS DOCUMENT RELATES TO** :  
**(see attached)** : **JUDGE FALLON**

---

**AFFIDAVIT OF PATRICK A. JUNEAU  
IN SUPPORT OF DEFENDANTS' MOTION FOR AN ORDER  
DISMISSING WITH PREJUDICE THE CLAIMS OF PLAINTIFFS  
WHOSE CLAIMS HAVE BEEN PROCESSED IN THE MDL RESOLUTION  
PROGRAMS**

---


STATE OF LOUISIANA )  
 )  
PARISH OF LAFAYETTE )

Patrick A. Juneau, having been duly sworn according to his oath, deposes and says:

1. I am the Court-appointed Special Master for both the First and Second MDL Resolution Programs and am authorized by this Court to exercise my rights and responsibilities as set forth in the Term Sheets for both Programs. I am familiar with the course of litigation in this matter and if called upon as a witness, could and would testify to the following facts based upon my own personal knowledge.

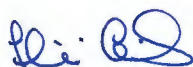
2. Attached hereto as Exhibits A and B are true and correct copies of the Term Sheets for the First and Second MDL Resolution Programs ("Programs"), respectively.

3. Attached hereto as Exhibit C is a list of plaintiffs enrolled in the First MDL Resolution Program who counsel received a \$250 payment from the Programs' Administrative Funds to defray costs paid for the medical record assembly for each plaintiff, in accordance with Sections 5C and 16B of the Term Sheets for the Programs.



PATRICK A. JUNEAU

Sworn to before me and  
subscribed in my presence  
this 21<sup>st</sup> day of December, 2011.



Notary Public  
Name Printed: Felicia Guidry  
Notary ID No.: 065233