

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

IN RE: PROPULSID PRODUCTS : **MDL NO. 1355**
LIABILITY LITIGATION :
: **SECTION: L**
THIS DOCUMENT RELATES TO :
ALL CASES : **JUDGE FALLON**

AFFIDAVIT OF RUSS M. HERMAN

STATE OF LOUISIANA

PARISH OF ORLEANS

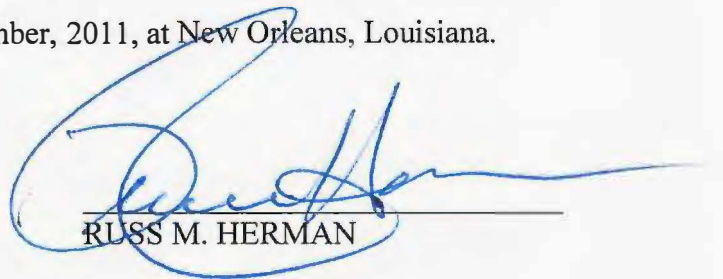
BEFORE ME, the undersigned Notary, personally came and appeared, Russ M. Herman, who, after being duly sworn, did swear and attest as follows:

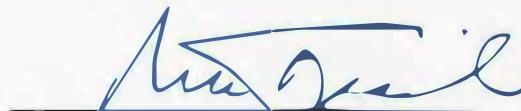
1. My name is Russ M. Herman. I am Plaintiffs' Lead and Liaison Counsel (PLC) in the Propulsid MDL.
2. On December 9, 2011, after due notice, the Court-appointed Plaintiffs' Steering Committee (PSC) met and considered the Joint Motion and Order for Partial Disbursement of Settlement Funds to Defendant Johnson & Johnson. Members in attendance in person or by conference call were as follows: Russ M. Herman, Daniel E. Becnel, Jr., James R. Dugan, Arnold Levin, Steven B. Murray, Sr., J. Michael Papantonio, Christopher A Seeger, Bob F. Wright and Charles Zimmerman.



3. In addition, Dawn Barrios and Richard Arsenault, the Court-appointed Co-Chairs of the State Liaison Committee (SLC), signified approval on behalf of the SLC dependent upon and in accordance with the approval by Plaintiffs' Liaison Counsel and the PSC.
4. The PSC and the Co-Chairs of the SLC unanimously approved and authorized the undersigned Plaintiffs' Liaison Counsel to join with defendants', Janssen, L.P. and Johnson & Johnson, in the Joint Motion and Order for the Partial Disbursement of Settlement Funds to Defendant Johnson & Johnson.
5. I have personal knowledge of this information and if asked to testify about it would be able to do so.

SWORN TO AND SUBSCRIBED BEFORE ME, the undersigned Notary Public, in Orleans Parish, on this 14 day of December, 2011, at New Orleans, Louisiana.


RUSS M. HERMAN


NOTARY PUBLIC
LA. Bar No. 19748