

**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 PATRICK A. JUNEAU**

STATE OF LOUISIANA

PARISH OF LAFAYETTE

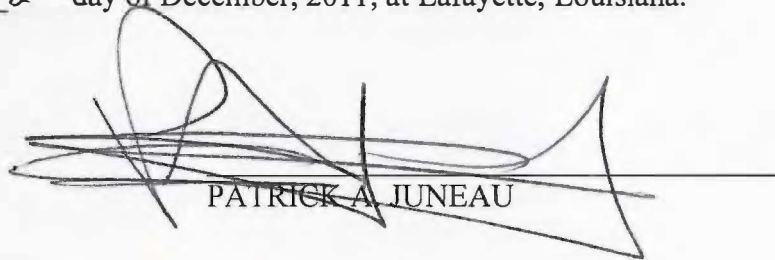
BEFORE ME, the undersigned Notary, personally came and appeared, Patrick A. Juneau, who, after being duly sworn, did swear and attest as follows:

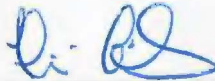
1. My name is Patrick A. Juneau. I am a person of the full age of majority and a resident of the State of Louisiana.
2. I am the Court-appointed Special Master for both MDL Resolution Programs I and II and am authorized by this Court to exercise my rights and responsibilities as set forth in this matter.
3. MDL Resolution Programs I and II are nearing an end.
4. There are only four tiered claims that require full briefing in MDL I and MDL II (two claims in MDL I and two claims in MDL II).
5. My office is working with the parties and their counsel to finalize the clearance of any remaining administrative claims in both programs.



6. Based on the foregoing and the current account balances of the settlement funds on deposit with Deutsche Bank, I am of the opinion that disbursement of \$40,000,000 from MDL I and \$5,000,000 from MDL II back to defendant, Johnson & Johnson, could be made and would not place the implementation of the settlement agreement at risk.
7. 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 Lafayette Parish, on this 24 day of December, 2011, at Lafayette, Louisiana.

  
PATRICK A. JUNEAU



NOTARY PUBLIC  
Name Printed: Felicia Guidry  
Notary ID No.: 065233