

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

<b>IN RE: PROPULSID PRODUCTS LIABILITY LITIGATION</b>	<b>:</b>	<b>MDL NO. 1355</b>
	<b>:</b>	
<b>THIS DOCUMENT RELATES TO (All Plaintiffs, Enrollees, and Cases in the Second MDL Resolution Program)</b>	<b>:</b>	<b>SECTION: L</b>
	<b>:</b>	
	<b>:</b>	<b>JUDGE FALLON</b>

**AFFIDAVIT OF PATRICK A. JUNEAU IN SUPPORT OF  
DEFENDANTS' MOTION FOR AN ORDER TO TERMINATE THE CLAIMS OF  
ALL ENROLLEES IN THE SECOND MDL RESOLUTION PROGRAM AND TO  
AUTHORIZE RETURN TO THE DEFENDANTS THE BALANCE OF THE  
SETTLEMENT FUND AND ADMINISTRATIVE FUND AFTER ALL  
PAYMENTS DUE THEREUNDER HAVE BEEN MADE**

STATE OF LOUISIANA

PARISH OF LAFAYETTE

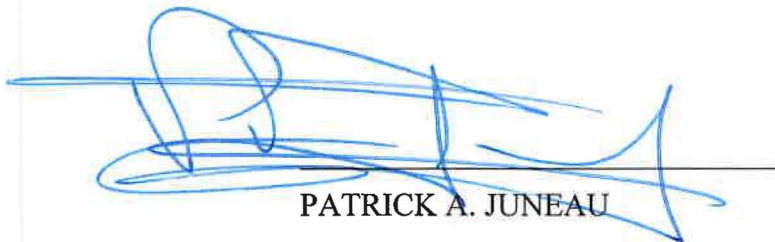
Patrick A. Juneau, having been duly sworn according to his oath, deposes and says:

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 relating to the Second MDL Resolution Program based upon my own personal knowledge.
2. The Special Master's Office collected and tracked the receipt of the enrollees' forms and sent to their counsel notices of delinquent and/or deficient submissions, as appropriate. The Special Master's Office additionally notified counsel for all enrollees of the enrollment status of each enrollee (whether each had been

disqualified and the reason(s) for that determination, with the opportunity to challenge that disqualification or seek reconsideration of same, whether each had been qualified and how each had been qualified – whether as a wrongful death plaintiff, a personal injury plaintiff or a tolling claimant). The Special Master’s Office regularly shared with the parties data updates regarding enrollment and the receipt of claim forms and medical records from enrollees.

3. As the Special Master’s Office received submissions from enrollees and deemed them complete for review, we forwarded the claim forms and medical records to a three-physician panel for review and eligibility determinations. For the remaining balance of submissions that were not deemed eligible for awards, claimants with sufficient records were entitled to payments to defray the costs of obtaining medical records required for participation in the Program (medical records reimbursements) in accordance with the Term Sheet. The Special Master’s Office processed and paid medical records reimbursements to a large number of enrollees in the Second MDL Resolution Program. All enrollees who received awards or medical records reimbursements have had their claims fully processed.
4. Some enrollees failed to submit claim forms. Some enrollees failed to submit medical records. Some enrollees failed to submit the necessary records to qualify them for medical records reimbursements. Each was given notice of these deficiencies, with the ability to cure them, and their claims were fully processed according to the requirements of the Term Sheet for the Second MDL Resolution Program.

5. All claims have been processed and finalized in the Second MDL Resolution Program, and it is appropriate now to terminate the Second MDL Resolution Program and the claims of all enrollees in the Second MDL Resolution Program.



PATRICK A. JUNEAU

Sworn to before me and subscribed  
in my presence this 14<sup>th</sup> day of  
September, 2012.



Notary Public  
Name Printed: Felicia Guidry  
Bar/Notary No. 065233