

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: : MDL DOCKET NO. 1401
: :
SULZER HIP PROSTHESIS AND : Case No. 1:01 CV 9000
KNEE PROSTHESIS PRODUCT : :
LIABILITY LITIGATION : Judge Kathleen O'Malley
: :
: :
This Document Relates to All Cases :

**Motion For Order Approving
Second Amendment To Class Action Settlement Agreement
Dated March 13, 2002**

Now come all parties in the above-captioned matter and move this Court for preliminary approval of the Second Amendment To Class Action Settlement Agreement dated March 13, 2002 ("Settlement Agreement"). A copy of this Second Amendment to Class Action Settlement Agreement is attached hereto and marked as "Exhibit A".

Respectfully submitted,

/S/ R. Eric Kennedy
R. ERIC KENNEDY, ESQ. #0006174
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*Liaison Counsel (Signing on behalf of Class
Counsel)*

CERTIFICATE OF SERVICE

A copy of the foregoing has been filed electronically with the U.S. District Court and has been sent electronically via email on this 3rd day of May, 2002, to all Class Counsel; Plaintiffs' Steering Committee and Special Counsel Members; Special State Counsel Committee Members; all Defense Counsel; and all Federal Case List Members, identified and attached to "Plaintiffs' Second Amended and Consolidated Class Action Complaint."

/s/R. Eric Kennedy

R. ERIC KENNEDY, ESQ. (0006174)
WEISMAN GOLDBERG & WEISMAN
CO., L.P.A.