

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

THOMAS MEGNA and  
KATHLEEN MEGNA,

Plaintiffs,

v

Case No. 01-106628-NO  
Hon. Daphne Means Curtis

SULZER ORTHOPEDICS,  
INC. a foreign corporation, and  
INTERMEDICS VREEDE, INC.

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**PLAINTIFF'S INTERROGATORIES TO DEFENDANT, SULZER  
ORTHOPEDICS, INC., DATED DECEMBER 6, 2001**

Please answer the following Interrogatories pursuant to MCR 2.309, 2.310 and 2.312.

The Interrogatories shall be answered separately and fully, in writing under oath, and must contain such information as is available to you or to your employees, agents, representatives, sureties or indemnitors.

The Interrogatories shall be deemed continuing and Supplemental Answers shall be required immediately when you have received, directly or indirectly, further or different information from the time the Answers are served until the time of trial.

1. Please provide the complete case caption, including the name, address and telephone number of the attorney for the Plaintiff, for any lawsuits filed against the Defendant that relate to any prosthetic device manufactured by Sulzer Orthopedics, Inc., utilizing the same manufacturing process that resulted in the recall, that were not the subject of the recall.

**ANSWER:**

2. Please provide the complete case caption for any lawsuits filed against the Defendant that relate to any prosthetic device manufactured by Sulzer Orthopedics, Inc., wherein it is alleged that the implanted orthopedic device was contaminated, but was not included in the recall effort.

**ANSWER:**

VANDEVEER GARZIA

By: \_\_\_\_\_  
David B. Timmis (P40539)  
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Dated: December 6, 2001