

**From:** [Proshanto Mukherji](#)  
**To:** [Philips-Zoll](#)  
**Subject:** ZOLL/Philips: disclosures in para. 23 of the Stipulated Protective Order (Garrett, McDaniel, Fouchard)  
**Date:** Monday, June 04, 2012 2:49:50 PM  
**Attachments:** [image002.jpg](#)  
[David Fouchard CV 2012.pdf](#)  
[Michael Garrett CV.pdf](#)  
[Wayne McDaniel CV.pdf](#)

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Counsel,

Pursuant to Paragraph 23 of the Stipulated Protective Order, ZOLL hereby gives notice of its intent to give the following people access to Philips' Confidential and Confidential Source Code materials:

1. Michael Garrett: previously served as an expert witness for Defibtech in *Philips v. Defibtech*;
2. Wayne McDaniel: previously involved with *Intermedics, Inc. v. Cardiac Pacemakers, Inc.*, where he was retained by Intermedics, Inc., as well as *Philips v. Defibtech*, where he was retained by Defibtech;
3. David Fouchard: has not previously been involved in patent litigation.

These individuals' CVs are attached.

Regards,

Proshanto

**Proshanto Mukherji**



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