

EXHIBIT A

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January 13, 2006

VIA FACSIMILE AND U.S. MAIL

Deborah A. Moeller
Andrew D. Carpenter
Shook Hardy & Bacon, LLP
2555 Grand Boulevard
Kansas City, MO 64108-2613

Re: In re Guidant Corp. Implantable Defibrillators Products Liability
Litigation, Case 0:05-MD-01708

Dear Debbie and Andy:

Pursuant to your request for Plaintiffs' top priority document requests at present, we wish to advise you that those consist of Request Numbers 1, 2, 3, 5, 6, 7, 18, 27, 33, 43, 49, 53 and 56 of Plaintiffs' First Joint Set of Requests for Production of Documents ("First Joint Request").

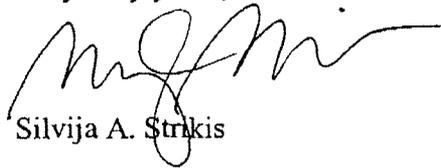
These top priority requests are in addition to the previously stated priority requests for documents that Guidant has submitted to various third parties. Such materials are referenced in First Joint Request Numbers 23, 24, 30, and 41, and Plaintiffs' Second Joint Set of Requests for Production of Documents. It is Plaintiffs' position that it should not be burdensome for Guidant to produce another copy of materials already collected and provided to third parties. It is our understanding that Guidant has thus far declined to produce any such information, except with respect to certain materials provided to the FDA. We therefore anticipate seeking the Court's guidance on this priority point.

In addition, based on our January 5, 2006 conference, it is our understanding that Guidant is producing the FDA Form 483 regarding the August-September 2005 inspection of Guidant's manufacturing facilities, along with related materials. Related priority materials are the subject of First Joint Request Numbers 28, 35, and 38. Please review those requests and advise whether the impending document production will satisfy those requests to the extent that they request materials relating to Form 483 and the FDA's findings. We also ask that Guidant produce the latest correspondence with the FDA on the inspection, including the FDA letters about which Guidant has recently made public statements.

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Finally, we request that you tell us whether Guidant has provided all documents responsive to First Joint Request Number 67. If not, we ask that you identify the materials that have not been produced so that we can consider how to prioritize them.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Silvija A. Strikis', written over a printed name.

Silvija A. Strikis

cc (via electronic mail):

Elizabeth J. Cabraser
Wendy R. Fleishman
Seth Lesser
Charles S. Zimmerman
Ronald S. Goldser
Richard Arsenault