IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

St. Jude Medical, Inc., et al. Plaintiffs, v. AccessClosure, Inc. Defendant.	Case No. 2:10-at-01287 Eastern District of California Case No. 4:08-cv-04101-HFB Western District of Arkansas

THIRD PARTY BOSTON SCIENTIFIC CORP'S
NOTICE OF MOTION TO QUASH
ST. JUDE MEDICAL, INC. AND ST. JUDE MEDICAL PUERTO RICO, LLC'S
SUBPOENA FOR DEPOSITION

TO: PLAINTIFFS ST. JUDE MEDICAL, INC. AND ST. JUDE MEDICAL PUERTO RICO, LLC, AND DEFENDANT ACCESSCLOSURE, INC., AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on a date and time to be assigned by the clerk of the court, or as soon as thereafter as may be heard in this Court, located at 501 I. Street, Sacramento, California, movant Boston Scientific Corporation ("BSC") – a non-party to this litigation – will move to quash the subpoena for deposition (the "Subpoena") propounded by plaintiffs, St. Jude Medical, Inc. and St. Jude Medical Puerto Rico, LLC (collectively, "St. Jude").

Movant makes this motion on the grounds that the Subpoena: seeks the designation of out-of-state witnesses who would be required to travel more than 100 miles to be deposed; seeks information regarding documents which are discoverable from the defendant, a party to this litigation; is overbroad, duplicative, and unduly burdensome; and seeks information that is irrelevant, privileged, confidential, and proprietary .

Movant's request is based on this notice, the motion and the memorandum in support of the motion filed concurrently herewith, the accompanying exhibits including the Declaration of Yi-Ming Su, and such other further evidence or argument of an oral and documentary nature as may be presented in connection with a hearing on the motion.

Dated: September 1, 2010

Respectfully submitted,

HOWREY LLP

By: /s/ *Aaron Myers*
Aaron Myers

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