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-mc-00089-GEB-DAD Eastern District of California Case No. 4:08-cv-04101-HFB Western District of Arkansas

THIRD PARTY BOSTON SCIENTIFIC CORP'S
AMENDED 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 at 10:00 a.m. on Friday, October 29, 2010, before Magistrate Judge Dale A. Drozd, in Courtroom 27 of this Court, located at 501 I Street, Sacramento, California 95814, 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.

Respectfully Submitted,

Dated: September 2, 2010

By: /s/ Aaron Myers

Aaron Myers
Attorney for Boston Scientific Corp.
HOWREY LLP
525 Market Street, Suite 3600
San Francisco, CA 94105
Telephone: (415) 848-4970
Facsimile: (415) 848-4999
E-mail: MyersA@howrey.com

CERTIFICATE OF SERVICE

I hereby certify that the Third Party Boston Scientific Corp's Amended Notice of Motion to Quash St. Jude Medical, Inc. and St. Jude Medical Puerto Rico, LLC's Subpoena for Deposition, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper and electronic copies will be sent to any non-registered participants on September 2, 2010.

By: /s/ Aaron Myers

Counsel for the Parties:

Nicholas H. Patton (nickpatton@texarkanalaw.com)
Patton, Tidwell & Schroeder, LLP
P.O. Box 5398
Texarkana, TX 75505-5398
(903) 792-7080
(903) 792-8233 (facsimile)

Morgan Chu (mchu@irell.com)
Jonathan Steinberg (jsteinberg@irell.com)
Andrei Iancu (aiancu@irell.com)
Maclain Wells (mwells@irell.com)
Jay Chung (jchung@irell.com)
Irell & Manella LLP
1800 Avenue of the Stars, Suite 900
Los Angeles, CA 09967
(310) 277-1010
(310) 203-7199 (facsimile)

Laura Evans (levans@irell.com)
Irell & Manella LLP
840 Newport Center Drive, Suite 400
Newport Beach, CA 92660
(949) 760-0991
(949) 760-5200 (facsimile)

James Norton Haltom (jhaltom@haltomdoan.com)
Darby Vincent Doan (ddoan@haltomdoan.com)
J. Scott Andrews (sandrews@haltomdoan.com)
Haltom & Doan
6500 N. Summerhill Road, Suite 100
Texarkana, TX 75505-6227
(903) 255-1000
(903) 255-0800 (facsimile)

Charles K. Verhoeven (charlesverhoeven@quinnemanuel.com)
Cathleen G. Garrigan (cathleengarrigan@quinnemanuel.com)
Matthew D. Cannon (matthewcannon@quinnemanuel.com)
Quinn Emanuel
50 California Street, 22nd Floor
San Francisco, California 94111
(415) 875-6600
(415) 875-6700 (facsimile)

Brian C. Cannon (briancannon@quinnemanuel.com)
Quinn Emanuel
555 Twin Dolphin Dr., 5th Floor
Redwood Shores, California 94065
(650) 801-5000
(650) 801-5100 (facsimile)