IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE: DEPUY ORTHOPAEDICS, INC. PINNACLE HIP IMPLANT PRODUCTS LIABILITY LITIGATION	MDL No. 2244 Honorable Ed Kinkeade

This Document Relates To:

Alicea v. DePuy Orthopaedics, Inc., No. 3:15-cv-3489-K

Barzel v. DePuy Orthopaedics, Inc., No. 3:16-cv-1245-K

Kirschner v. DePuy Orthopaedics, Inc., No. 3:16-cv-1526-K

Miura v. DePuy Orthopaedics, Inc., No. 3:13-cv-4119-K

Stevens v. DePuy Orthopaedics, Inc., No. 3:14-cv-1776-K

Stevens v. DePuy Orthopaedics, Inc., No. 3:14-cv-2341-K

AFFIDAVIT OF DAVID SHEIN, M.D.

1) On Friday, October 13, 2017, at approximately 11:00am while I was scrubbing in for surgery at the Montefiore Hospital, I met with my DePuy sales representative Glen Swajger in connection with a procedure that required his involvement.
2) Mr. Swajger looked terrible and appeared stressed, so I asked him what was going on. He said the day before (October 12, 2017), he had been contacted by the DePuy lawyers and that discussion made him anxious. He said the lawyers were "on him like crazy." They were putting "big time pressure" on him.
3) Mr. Swajger told me that as a result of the conversations with DePuy attorneys, he was worried there could be ramifications for me in my practice in connection with my upcoming Dallas testimony.
4) He indicated the lawyers were "peppering him". He said the "business in Dallas was freaking [him] out." He said he had a "terrible" day on Thursday as a result of this and my going to Dallas was driving him crazy. He said "I care about you."
5) Mr. Swajger also told me on Friday that he knows as much about metal on metal as I do, and that he would still want metal on metal because the wear characteristics are better than metal on poly, and he would want me to do his surgery.

Dr. David Shein

10/15/2017