



AMERICAN ASSOCIATION FOR JUSTICE STÖCKERT 3T HEATER- COOLER LITIGATION GROUP MEMBERSHIP APPLICATION

Membership limited to AAJ Regular, Sustaining, Leaders Forum, President's Club, and Life members.

Membership Requirements and Purpose Statement

AAJ Regular, Life, President's Club, Leaders Forum, or Sustaining Members may join the Stöckert 3T Heater-Cooler Litigation Group if the applicant affirms those requirements set forth in the Stöckert 3T Heater-Cooler Litigation Group Membership Affidavit.

The purposes of the Stöckert 3T Heater-Cooler Litigation Group are as follows:

1. To encourage the exchange of information among members of the group for the common benefit of all Litigation Group members and their clients;
2. To provide educational programs relating to Stöckert 3T Heater-Cooler litigation;
3. To provide networking opportunities through AAJ list servers and educational programs;
4. To provide pleadings, medical literature, research, internal company documents (to the extent permissible under confidentiality agreements), expert information, and other materials;
5. To offer assistance and guidance concerning the coordination of state litigation and MDL litigation, if applicable;
6. To have members work together for the common purpose of litigating Stöckert 3T Heater-Cooler cases successfully; and
7. To attract new members to the American Association for Justice and the Stöckert 3T Heater-Cooler Litigation Group.

Membership Dues:

\$300 for first member and \$100 for each member from the same firm (no firm paying more than \$400).

Name: _____

Name of Firm: _____

Address: _____

Office Phone Number: _____

Fax Number: _____

E-mail Address: _____

AAJ ID#: _____

This must be included in your application. If you do not know your number, call AAJ at 202.965.3500 or 800.424.2725, ext. 8611.

Year Admitted to Practice: _____ State Bar #: _____

Practice Area: _____

Type of Membership:

Regular _____ Sustaining _____ Leaders Forum _____ President's Club _____ Life _____

Please enclose a check made payable to the Stöckert 3T Heater-Cooler Litigation Group. Send check, application and affidavit to:

Kate Jaycox
Robins Kaplan LLP
800 LaSalle Ave., Suite 2800
Minneapolis, MN 55402

612/349-8452
kjaycox@robinskaplan.com

If we need to contact you to service your membership record or to provide you with information about member products and services and advocacy and legislative updates, we will honor your contact preferences. By providing your contact information, including phone number, fax number, and email address, you consent and give permission for AAJ and affiliated state trial lawyer associations to contact you by any of those means, which may include calls to your mobile phone, faxes, or emails. You may contact AAJ at any time to change your preferences.



AMERICAN ASSOCIATION FOR JUSTICE STÖCKERT 3T HEATER- COOLER LITIGATION GROUP MEMBERSHIP AFFIDAVIT

I, _____, hereby affirm:

1. I am a Regular, Life, President's Club, Leaders Forum, or Sustaining member of the American Association for Justice (AAJ) in good standing. My AAJ Membership Number is _____ and I am a member in good standing of the bar(s) of _____.
2. I am primarily engaged in the representation of plaintiffs.
3. Neither I, nor anyone from my firm or anyone affiliated with my firm, defends or otherwise represents (including all forms of transactional work) a defendant in any case involving the Stockert 3T Heater-Cooler Device. Neither I, nor anyone of my firm or anyone affiliated with my firm, engages in defense work of personal injury actions against pharmaceutical or medical device companies.
4. Neither my practice nor my firm's practice, in whole or meaningful part, has a significant relationship with interests adverse to, or inconsistent to, those of AAJ or the Stöckert 3T Heater-Cooler Litigation Group.
5. I desire to work in concert with other member attorneys representing plaintiffs in similar Stöckert 3T Heater-Cooler cases in cooperative effort to assist in achieving our common interests to prepare and fairly resolve individual cases properly.
6. I will not disclose any portion of, or any copies of, any information obtained from this Group to any company involved with Stryker or an affiliate entity, their agents, employees, independent contractors, or to any person, firm or entity where the materials may be seen, copied, accessed, or otherwise reached by any Stryker related entity or person or affiliated entities.
7. I will not make recordings of any Stöckert 3T Heater-Cooler Litigation Group meetings or proceedings or any portion thereof without the written permission of the Chair or Cochairs.
8. I will fully and candidly share relevant information, documents, and other materials with other members of the Stöckert 3T Heater-Cooler Litigation Group.
9. I will not disclose information of a strategic nature to non-members if such disclosure would compromise the interests of members and their clients who are victims of Stryker products.
10. I will not share, show, reveal, or disclose any information, documents, index, or materials obtained from the Stöckert 3T Heater-Cooler Litigation Group, its members, or the AAJ Exchange, nor will I distribute the information unless ordered to do so by a court of competent jurisdiction.
11. I will notify the Chair or Cochairs of the Stöckert 3T Heater-Cooler Litigation Group if any request is made to obtain the Index or any materials obtained from or through Stöckert 3T Heater-Cooler Litigation Group, and I will resist such attempts.
12. I understand that there will be a dues obligation to the Litigation Group, initially \$300 for first member and \$100 for each member from the same firm with no firm paying more than \$400), but subject to reasonably necessary increases from time to time.
13. I understand that my initial and continued membership in this Litigation Group is contingent upon the payment of dues, membership in AAJ, membership in good standing of the Bar, and my ongoing commitment to the principles and representations made above on which I fully appreciate that my colleagues are strictly relying.
14. I understand that I am not entitled as a matter of right to be a member of this Litigation Group nor do I have any obligation to join, and that I will be entitled to remain in this Group only to the extent that I fully comply with the above written representations and subject to the prevailing rules, regulations, and guidelines for AAJ Litigation Groups in general and the Stöckert 3T Heater-Cooler Litigation Group in particular.
15. By joining this Litigation Group and providing my contact information, including email address, I consent and give permission for AAJ to add me to the corresponding AAJ Litigation Group list server to receive emails from AAJ members and AAJ on the list server.

I HEREBY SWEAR AND AFFIRM UNDER THE PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF. I FURTHER AGREE THAT IF ANY OF THE ABOVE INFORMATION IS KNOWINGLY AND PURPOSEFULLY VIOLATED, THAT MY MEMBERSHIP IN THE STÖCKERT 3T HEATER-COOLER LITIGATION GROUP SHALL BE IMMEDIATELY TERMINATED, AND THAT I MAY BE SUBJECT TO ETHICAL AND DISCIPLINARY CHARGES.

Printed Name

Date

Signature



AMERICAN ASSOCIATION FOR JUSTICE
**STÖCKERT 3T HEATER-
COOLER LITIGATION GROUP**
PAYMENT INFORMATION

Check is enclosed

Make payable to “Stöckert 3T Heater-Cooler Litigation Group” and include name, AAJ ID Number, and “Stöckert” in Memo

Signature: _____

Membership dues paid to the American Association for Justice (AAJ) are not tax deductible as charitable contributions for income tax purposes. However, dues may be tax deductible as ordinary and necessary business dues and expenses subject to restrictions imposed as a result of AAJ's lobbying activities. AAJ estimates that the portion of dues and other similar amounts that it expects to receive that are allocable to AAJ's lobbying expenditures is 37%. Accordingly, currently 63 percent of your dues and contributions to AAJ may be deducted as ordinary and necessary business expenses. Please consult your tax advisor to confirm.