

Respectfully submitted,

By: /s/Brian P. Johnson

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**ATTORNEYS FOR SMITH & NEPHEW,
INC.**

CERTIFICATE OF SERVICE

I certify that, in accordance with the Texas Rules of Civil Procedure, a true and correct copy of the foregoing document was served upon the following counsel of record on the 6th day of July 2020 via email:

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/s/Brian P. Johnson

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4. In my review of the documents listed on Exhibit A, I confirmed that each document contained (i) communications reflecting a lawyer or lawyer's representative rendering professional legal services; (ii) communications made to facilitate the rendition of legal services; and/or (iii) materials prepared, mental impressions developed, or communications made in anticipation of litigation or for trial.
5. I have reviewed and understand Rule 503 of the Texas Rules of Evidence, including the definitions of "client," "client's representative," "lawyer," "lawyer's representative," and "confidential," as well as the Rules of Privilege contained therein.
6. I have also reviewed and understand the definition of "work product" as defined in Rule 192.5 of the Texas Rules of Civil Procedure.
7. Based on my knowledge of relevant S&N documents and materials, the documents on the privilege logs bearing the Privilege Log numbers on Exhibit A, and the definitions in Rule 503 of the Texas Rules of Evidence and Rule 192.5 of the Texas Rule of Civil Procedure noted above, all of the documents on Exhibit A include (i) confidential communications among lawyers, lawyers' representatives, clients, or client representatives, where the communication was made to facilitate the rendition of legal services, (ii) material prepared or mental impressions developed in anticipation of litigation or for trial by or for S&N or its representatives, and/or (iii) communication between S&N and its representatives, or among its representatives, made in anticipation of litigation or for trial.

Further declarant sayeth naught.

My name is Sarah E. Segrest-Jay, my date of birth is January 9, 1977, and my address is 400 Poydras Street, Suite 2700, New Orleans, Louisiana 70130. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Baldwin County, State of Alabama, on the 6th day of July, 2020.



Sarah E. Segrest-Jay

EXHIBIT A TO SUPPLEMENTAL DECLARATION OF SARAH E. SEGRETT-JAY

SNKEMPLOG0000742
SNKEMPLOG0000941
SNKEMPLOG0001799
SNKEMPLOG0001800
SNKEMPLOG0002094
SNKEMPLOG0002132
SNKEMPLOG0002259
SNKEMPLOG0003145
SNKEMPLOG0003424
SNKEMPLOG0003425
SNKEMPLOG0003426
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SNKEMPLOG0004917
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SNKEMPLOG0007579
SNKEMPLOG0008173
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