

# Exhibit B

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

No. MD-15-02641-PHX-DGC

**MASTER SHORT FORM COMPLAINT  
FOR DAMAGES FOR INDIVIDUAL  
CLAIMS**

Plaintiff(s) named below, for their Complaint against Defendants named below,  
incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc.       ).

Plaintiff(s) further show the Court as follows:

1. Plaintiff/Deceased Party:

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2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of  
consortium claim:

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3. Other Plaintiff and capacity (i.e., administrator, executor, guardian,  
conservator):

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4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at  
the time of implant:

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GALLAGHER & KENNEDY, P.A.  
2575 EAST CAMELBACK ROAD  
PHOENIX, ARIZONA 85016-9225  
(602) 530-8000

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5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of injury:

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6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

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7. District Court and Division in which venue would be proper absent direct filing:

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8. Defendants (check Defendants against whom Complaint is made):

- C.R. Bard Inc.
- Bard Peripheral Vascular, Inc.

9. Basis of Jurisdiction:

- Diversity of Citizenship
- Other: \_\_\_\_\_

a. Other allegations of jurisdiction and venue not expressed in Master Complaint:

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10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim (Check applicable Inferior Vena Cava Filter(s)):

- Recovery<sup>®</sup> Vena Cava Filter
- G2<sup>®</sup> Vena Cava Filter

1           €     G2<sup>®</sup> Express (G2<sup>®</sup>X) Vena Cava Filter

2           €     Eclipse<sup>®</sup> Vena Cava Filter

3           €     Meridian<sup>®</sup> Vena Cava Filter

4           €     Denali<sup>®</sup> Vena Cava Filter

5           €     Other: \_\_\_\_\_

6           11.    Date of Implantation as to each product:

7           \_\_\_\_\_

8           \_\_\_\_\_

9           12.    Counts in the Master Complaint brought by Plaintiff(s):

10              Count I:     Strict Products Liability – Manufacturing Defect

11              Count II:    Strict Products Liability – Information Defect (Failure to  
12                                   Warn)

13              Count III:   Strict Products Liability – Design Defect

14              Count IV:    Negligence - Design

15              Count V:     Negligence - Manufacture

16              Count VI:    Negligence – Failure to Recall/Retrofit

17              Count VII:   Negligence – Failure to Warn

18              Count VIII:  Negligent Misrepresentation

19              Count IX:    Negligence *Per Se*

20              Count X:     Breach of Express Warranty

21              Count XI:    Breach of Implied Warranty

22              Count XII:   Fraudulent Misrepresentation

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- Count XIII: Fraudulent Concealment
- Count XIV: Violations of Applicable \_\_\_\_\_ (insert state)  
Law Prohibiting Consumer Fraud and Unfair and Deceptive Trade  
Practices
- Count XV: Loss of Consortium
- Count XVI: Wrongful Death
- Count XVII: Survival
- Punitive Damages
- Other(s): \_\_\_\_\_ (please state the facts supporting  
this Count in the space immediately below)

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