

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

**CAROLYN M. KIEFFABER and
THOMAS M. KIEFFABER,**

Plaintiffs,

v.

**ETHICON, INC. and
JOHNSON & JOHNSON,**

Defendants.

CIVIL ACTION

No. 20-1177-KHV

AFFIDAVIT OF CHRISTIAN TIEDEMANN

I, Christian Tiedemann, am over the age of 18 and make the following statements based on my personal knowledge:

1. I am founding partner of Prolumina, a litigation communication company located at 2200 Sixth Avenue, Suite 425, Seattle, Washington, 98121.

2. There is no reasonable question as to my ability, or the ability of any Prolumina employee assigned to this case, Kieffaber et al. v. Ethicon et al., to be impartial as special master in administration of technical responsibilities attendant to the use of the Zoom platform before and through trial and post-trial proceedings in this case.

3. Neither I, nor any Prolumina employee assigned to the case, have any personal bias or prejudice concerning any party in this case.

4. Neither I, nor any Prolumina employee assigned to this case, have personal knowledge of disputed evidentiary facts concerning this case.

5. Neither I, nor any Prolumina employee assigned to this case, have served as a lawyer in

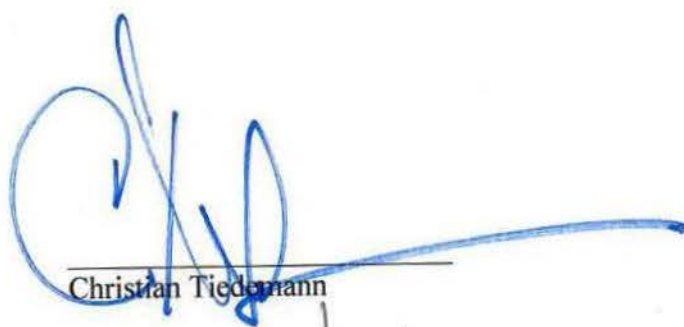
the matter in controversy, or have previously practiced law with an attorney concerning this matter, or have been a material witness concerning this matter.

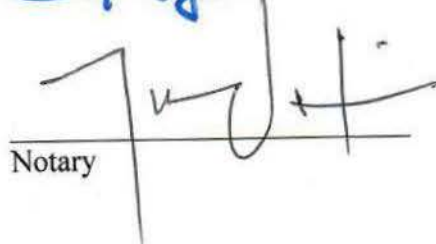
6. Neither I, nor any Prolumina employee assigned to this case, have, as a government employee, participated as counsel, adviser, or material witness concerning this proceeding or expressed an opinion concerning the merits of the particular case in controversy.

7. Neither I, nor any Prolumina employee assigned to the case, individually or as a fiduciary, nor any spouse or minor child of myself or any Prolumina employee assigned to this case, have a financial interest in the subject matter in controversy or in a party to the proceeding, or any other interest that could be substantially affected by the outcome of this proceeding.

8. Neither I, nor any Prolumina employee assigned to this case, nor any person within the third degree of relationship to myself or any Prolumina employee assigned to this case, is a party to this proceeding, or an officer, director, or trustee of a party; is acting as a lawyer in this proceeding; have an interest that could be substantially affected by the outcome of the proceeding; or is likely to be a material witness in the proceeding.

9. Neither I, nor any Prolumina employee assigned to this case has a spouse, or person within the third degree of relationship to a spouse, who is a party to this proceeding or an officer, director, or trustee of a party; is acting as a lawyer in this proceeding; has an interest that could be substantially affected by the outcome of the proceeding; or is likely to be a material witness in the proceeding.


Christian Tiedemann


Notary

STATE OF: WA

COUNTY OF: KING

Subscribed and sworn before me this 26th day of FEB, 2021.

My commission expires:
JAN 23rd, 24

