

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

Robert Tavares

Case No: 1:16-cv-02989

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Robert Tavares ("Plaintiff") submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On November 2, 2016, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 75-year-old man, living in Seymour, Missouri who received a Cook Celect filter on May 5, 2011. Imaging and clinical evaluation confirm that Mr. Tavares has suffered significant complications from his Cook Celect IVC filter. A fractured filter strut has penetrated completely through the lateral wall of the infrarenal

inferior vena cava and extended approximately 13 mm into the ventral portion of the right kidney, constituting a Grade 4 perforation into a vital organ. The filter also demonstrates tilt and embedment, consistent with long-term device instability. Interventional radiology determined that percutaneous retrieval would be extremely challenging and carried a substantial risk of further strut fracture, advising that only open surgical removal would be feasible. Because Mr. Tavares has not undergone such a procedure, the fractured strut and filter remain in place. These findings reflect a fractured, penetrating, and irretrievable Cook Celect filter with direct injury to the kidney and structural compromise of the IVC.

Mr. Tavares has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past nine years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$ 273,000**.

Based on her injuries the following values represent the reasonable amount for settlement or Mr. Tavares's claims:

Fracture	\$ 200,000
Grade 4 perforation into Kidney	\$ 25,000
Associated impact	\$ 40,000
Migration / Embedment	\$ 8,000
<b>Total:</b>	<b>\$ 273,000</b>

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of

avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026

	<p>Respectfully submitted,</p> <p><u>/s/ Taurin J. Robinson, Esq.</u> Taurin J. Robinson (Bar No. 352197) The Robinson Law Firm, Prof. Corp. 3055 Wilshire Boulevard, Ste. 980 P (213) 674-7301 F (213) 674-7340 <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a> Counsel for Plaintiff</p>
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

MAGISTRATE JUDGE TIM A. BAKER

This Document Relates to Plaintiff:

Adeline Brown

Case No: 1:17-cv-02446

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Adeline Brown (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On July 19, 2017, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is an 89-year-old woman, living in Fond Du Lac, Wisconsin who received a Cook Celect filter on July 2, 2014.

Since the filter implantation, Plaintiff has experienced multiple significant defects associated with her Cook Celect filter. Imaging demonstrates Grade 2 perforation, with

multiple struts projecting beyond the wall of the inferior vena cava, as well as significant tilt and embedment of the device. In 2015, an attempted retrieval was performed but was unsuccessful, with the interventional radiologist documenting that the filter limbs were firmly embedded in the caval wall and could not be released despite multiple techniques. The filter remains permanently indwelling. These findings reflect a device-related abnormality involving perforation, tilt, embedment, and irretrievability, all documented in the medical record.

Ms. Brown has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$ 68,000**.

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Brown's claims:

<u>Injury/Defect</u>	<u>Amount</u>
Irretrievable filter	\$ 25,000
Unsuccessful Percutaneous Retrieval	\$ 22,500
Grade 2 perforation	\$ 12,500
Tilt/Embedment	\$ 8,000
<b>Total:</b>	<b>\$ 68,000</b>

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

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Counsel for Plaintiff

**EXHIBIT A**

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL No.  
2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Viviano Rodriguez

Case No: 1:17-cv-02616

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Viviano Rodriguez (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 3, 2017, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 51-year-old man, living in Menifee, California who received a Cook Gunther Tulip filter on July 9, 2007. Since the filter implantation, Plaintiff has experienced significant defects with his Cook Gunther Tulip filter including, but not limited to perforation, tilt, and embedment. The preceding injuries evidence a

defect with the Cook Gunther Tulip filter implanted in Mr. Rodriguez.

Mr. Rodriguez has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$45,500**.

Based on her injuries the following values represent the reasonable amount for settlement of Mr. Rodriguez's claims:

Complications (non-open procedure), doctors found it difficult to remove - 25000

Grade 2 Perforation - 12,500

Tilt - 8,000

Total: 45,500

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

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Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL  
No. 2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Teresa Whetstone

Case No: 1:17-cv-02671

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Teresa Whetstone ("Plaintiff") submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 8, 2017, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 75-year-old woman, living in Oak Grove, Missouri who received a Cook Celect filter on June 4, 2012. Since the filter implantation, Plaintiff has experienced significant defects with her Cook Celect filter including, but not limited to perforation, migration, and embedment. Additionally, the filter was removed through a complicated percutaneous retrieval. The preceding injuries evidence a defect with the

Cook Celect filter implanted in Ms. Whetstone.

Ms. Whetstone has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$ 781,500**.

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Whetstone's claims:

Open abdominal surgery Procedure	\$ 600,000
Complications (tachycardia and hypotension)	\$ 50,000
Unsuccessful percutaneous retrieval	\$ 22,500
Successful Complex retrieval	\$ 22,500
Successful percutaneous retrieval	\$ 18,500
Grade 4 Perforation into Major Organ	\$ 25,000
Grade 3 Perforation, abutting duodenum	\$ 17,500
Grade 3 perforation with abutting impacting vital organ	\$ 17,500
<u>Migration / Tilt</u>	<u>\$ 8,000</u>
<b>Total:</b>	<b>\$ 781,500</b>

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the

interest of avoiding further costs, time and expense associated with further litigation.

Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

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Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
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LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

William Heeb

Case No: 1:17-cv-02672

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff William Heeb (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 7, 2017, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 70-year-old man, living in Cincinnati, Ohio who received a Cook Celect filter on July 6, 2009. Since the filter implantation, Plaintiff has experienced significant defects with his Cook Celect filter including but not limited to perforation and tilt. Additionally, the preceding injuries evidence a defect with the Cook

Celect filter implanted in Mr. Heeb.

Mr. Heeb has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle his claims against Defendants for **\$20,500**.

Based on his injuries the following values represent the reasonable amount for settlement of Mr. Heeb's claims:

<u>Injury/Defect</u>	<u>Amount</u>
Grade 2 perforation through IVC Wall	\$ 12,500
Tilt	\$ 8,000
<b>Total:</b>	<b>20,500</b>

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026

	Respectfully submitted,  <u>/s/ Taurin J. Robinson, Esq.</u> Taurin J. Robinson (Bar No. 352197) The Robinson Law Firm, Prof. Corp. 3055 Wilshire Boulevard, Ste. 980 P (213) 674-7301 F (213) 674-7340 <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a> Counsel for Plaintiff
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL No.  
2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Jennifer Varela

Case No: 1:17-cv-02759

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Jennifer Varela (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 11, 2017, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 62-year-old woman, living in Denver, Colorado who received a Cook Gunther Tulip filter on May 14, 2011. Since the filter implantation, Plaintiff has experienced significant defects with her Cook Gunther Tulip filter including but not limited to grade 4 IVC perforation through into the peritoneal fat. The preceding

injuries evidence a defect with the Cook Gunther Tulip filter implanted in Ms. Varela.

Ms. Varela has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$ 65,000**.

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Varela's claims:

Grade 4 Perforation                  \$ 25,000

    into peritoneal fat

Above Impact                  \$ 40,000

**Total:**                  **\$ 65,000**

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation.

Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026	Respectfully submitted,  <u>/s/ Taurin J. Robinson, Esq.</u> Taurin J. Robinson (Bar No. 352197) The Robinson Law Firm, Prof. Corp. 3055 Wilshire Boulevard, Ste. 980 P (213) 674-7301 F (213) 674-7340 <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a> Counsel for Plaintiff
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

Candy Freker

Case No: 1:17-cv-02774

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Candy Freker (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

I. STATEMENT OF FACTS

On August 14, 2017, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 52-year-old woman, living in Tucson, Arizona who received a Cook Gunther Tulip filter on September 3, 2008.

Since the filter implantation, Plaintiff has experienced multiple significant defects

associated with her Cook Günther Tulip filter. Imaging confirms fracture of the device with a discontinuous limb located within the L2–L3 intervertebral disc space, consistent with filter component separation and migration. Additional CT and radiographic studies demonstrate multiple fractured metallic segments projecting over the lumbar spine, as well as struts extending beyond the wall of the inferior vena cava, consistent with perforation and embedment. One fractured component lies adjacent to the anterior aspect of the spine, and another is located near the right hip region, reflecting separate fragment locations. These findings collectively represent a device-related failure involving fracture, migration of filter components, perforation, and embedment, all of which are documented in the medical record and consistent with long-term indwelling filter complications

Ms. Freker has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$ 310,500.**

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Freker's claims:

Defect/Injury	Amount
Fractured Filter	\$ 200,000
Strut remaining in dangerous location (spine)	\$ 75,000
Second strut in different location (hip)	\$ 15,000

Defect/Injury	Amount
Grade 2 perforation, not impacting organ	\$ 12,500
Embedment	\$ 8,000
<b>Total Proposed Settlement</b>	<b>\$310,500.00</b>

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

#### POTENTIAL MOTIONS

Defendants have recently threatened a statute of limitations motion, despite having possessed Ms. Freker's medical records since 2017 and litigating this case for eight years. Any such motion fails for three independent reasons:

1. The Claim Is Timely Under Arizona's Discovery Rule.

Arizona law provides that a cause of action accrues only when the plaintiff knows or reasonably should know both that she has been injured and that the injury was caused by the defendant's product. *Walk v. Ring*, 202 Ariz. 310, 316 (2002). Ambiguous or speculative medical findings do not trigger accrual. *Tavilla v. Cephalon, Inc.*, 870 F. Supp. 2d 759, 764 (D. Ariz. 2012).

The January 13, 2014 CT scan stated only that findings "likely represent" a fracture — an equivocal observation insufficient to begin the limitations period under

Walk and Tavilla. Accrual began on October 12, 2015, when Ms. Freker received a definitive diagnosis confirming multiple fractured filter components and linking them to her chronic back pain. Her August 2017 filing was therefore timely under Ariz. Rev. Stat. § 12-542.

2. At Minimum, Competing Interpretations of the 2014 and 2015 CT Scans Create a Factual Dispute.

Whether a reasonable layperson should have understood the 2014 report as a confirmed injury is a fact question inappropriate for dismissal or summary judgment. Arizona courts repeatedly hold that when medical records are ambiguous, the discovery rule cannot be resolved as a matter of law. *Walk*, 202 Ariz. at 316; *Tavilla*, 870 F. Supp. 2d at 764.

The October 2015 report was the first unequivocal diagnosis. Even under the earliest possible accrual date supported by the evidence, Ms. Freker filed within two years.

3. Cook Waived and Is Estopped from Asserting the Defense After Eight Years of Litigation.

Waiver occurs when a party's conduct is inconsistent with an intent to assert a known right. *Am. Cont'l Life Ins. Co. v. Ranier Constr. Co.*, 125 Ariz. 53, 55 (1980). Waiver may occur even when the defense was pled. *Jones v. Cochise County*, 218 Ariz. 372, 379–80 (Ct. App. 2008).

Cook has:

- possessed Ms. Freker's medical records since 2017,

- engaged in discovery, disclosures, and settlement preparation, and
- waited until the eve of settlement to raise this defense.

This is precisely the type of prejudicial delay that Arizona courts treat as waiver and estoppel. *See Jones*, 218 Ariz. at 380; *Pritchard v. State*, 163 Ariz. 427, 432–33 (1990).

## CONCLUSION

Because (1) the claim is timely under Arizona’s discovery rule, (2) factual disputes preclude dismissal, and (3) Cook waived and is estopped from asserting the defense after eight years of inconsistent conduct, any statute of limitations motion should be denied.

Date: January 6, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.  
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Counsel for Plaintiff

deemed irretrievable. The preceding injuries evidence a defect with the Cook Celect filter implanted in Ms. Goodwin.

Ms. Goodwin has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$340,000**.

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Goodwin's claims:

Defect/Injury	Amount
Fractured Filter	\$ 200,000
Irretrievable filter (strut remaining in dangerous location (near spine)	\$ 75,000
Above impact, chronic back pain from filter prong embedment in spine	\$ 40,000
Grade 2 perforation, not impacting organ	\$ 12,500
Significant Tilt (20°) / Embedment	\$ 12,500
<b>Total Proposed Settlement</b>	<b>\$340,000</b>

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

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Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL No.  
2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Lacoya Crump

Case No: 1:17-cv-02796

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Lacoya Crump ("Plaintiff") submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 16, 2017, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 46-year-old woman, living in Monroe, North Carolina who received a Cook Celect filter on August 28, 2014. Since the filter implantation, Plaintiff has experienced significant defects with her Cook Celect filter including but not limited to perforation and tilt. Additionally, she suffered a complicated retrieval due to the level of filter embedment. The preceding injuries evidence a defect with the Cook

Celect filter implanted in Ms. Crump.

Ms. Crump has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$ 84,000.**

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Crump's claims:

<b>Injury/Defect</b>	<b>Amount</b>
Grade 3 Hook perforation	\$ 17,500
Grade 3 Prong perforation	\$ 17,500
Successful percutaneous retrieval	\$ 18,500
Successful complex retrieval	\$ 22,500
Tilt	\$ 8,000
<b>Total:</b>	<b>\$84,000.00</b>

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

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Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL No.  
2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Derrill Everette

Case No: 1:17-cv-02799

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Derrill Everette (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 16, 2017, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 61-year-old man, living in Independence, Missouri who received a Cook Celect filter on June 6, 2012. Since the filter implantation, Plaintiff has experienced significant defects with his Cook Celect filter including, but not limited to perforation, embedment, a filter clog that required extra cleaning and a second filter

placement and a filter clog that required extra cleaning and a second filter placement.

Additionally, the preceding injuries evidence a defect with the Cook Celect filter implanted in Mr. Everette.

Mr. Everette has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle his claims against Defendants for **\$ 185,500.**

Based on his injuries the following values represent the reasonable amount for settlement of Mr. Everette's claims:

<b>Injury/Defect</b>	<b>Amount</b>
Grade 4 Perforation into psoas muscle	\$ 25,000
Above Impact	\$ 40,000
Grade 4 Perforation into adjacent vertebral body	\$ 25,000
Above Impact	\$ 40,000
Unsuccessful Percutaneous Retrieval	\$ 22,500
Complications (filter clogged, required additional filter)	\$ 25,000
Embedment	\$ 8,000
<b>Total:</b>	<b>\$185,500.00</b>

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

Taurin J. Robinson (Bar No. 352197)

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Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL No. 2570**  
**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

William Phillips

Case No: 1:17-cv-02851

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff William Phillips (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 18, 2017, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 61-year-old man, living in Cleveland, Ohio who received a Cook Gunther Tulip filter on March 6, 2009. Since the filter implantation, Plaintiff has experienced significant defects with his Cook Gunther Tulip filter including but not limited to perforation and embedment. Additionally, the filter has been deemed

irretrievable. The preceding injuries evidence a defect with the Cook Gunther Tulip filter implanted in Mr. Phillips.

Mr. Phillips has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$95,500**.

Based on her injuries the following values represent the reasonable amount for settlement of Mr. Phillips's claims:

Irretrievable filter - 75,000 (strut remains in dangerous location)

Grade 2 Perforation - 12,500

Tilt - 8,000

Total: 95,500

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

Taurin J. Robinson (Bar No. 352197)  
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Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL No.  
2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Latina Lindstrom o/b/o Everett Fike,  
deceased

Case No: 1:17-cv-02921

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the  
Southern District of Indiana, Indianapolis Division, located at United States Courthouse,  
46 East Ohio Street, Indianapolis, Indiana. Latina Lindstrom o/b/o Everett Fike, deceased  
("Plaintiff") submits the following Confidential Settlement Statement in preparation for  
the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 24, 2017, Plaintiff filed her action on behalf of decedent Everett Fike  
("Decedent") in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging  
strict products liability failure to warn and design defect, negligence, negligence per se,  
breach of express and implied warranty, and punitive damages. Decedent was a 90-year-  
old man, living in Surprise, Arizona who received a Cook Gunther Tulip filter on October  
15, 2007. Decedent subsequently passed away on October 3, 2015. Since the filter

implantation, Decedent had experienced significant defects with his Cook Gunther Tulip filter including, but not limited to perforation, embedment and transmetatarsal amputation due to clotting. The preceding injuries evidence a defect with the Cook Gunther Tulip filter implanted in Mr. Fike.

Ms. Lindstrom, has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$ 120,500**.

Based on his injuries the following values represent the reasonable amount for settlement for Ms. Lindstrom's claims:

<b>Injury/Defect</b>	<b>Amount</b>
Irretrievable filter (strut remained in dangerous location)	\$ 75,000
Complication: Filter possibly related to partial amputation of leg	\$ 25,000
Grade 2 perforation	\$ 12,500
Tilt/Embedment	\$ 8,000
<b>Total:</b>	<b>\$120,500.00</b>

Decedent's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026	Respectfully submitted,  <u>/s/ Taurin J. Robinson, Esq.</u>
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Taurin J. Robinson (Bar No. 352197)  
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Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL  
No. 2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Debra Beltran

Case No: 1:17-cv-02922

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Debra Beltran (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 24, 2017, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defects, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 63-year-old woman, living in Pomona, California who received a Cook Celect filter on November 11, 2009. Since the filter implantation, Plaintiff has experienced significant defects with her Cook Celect filter including but not limited to perforation and embedment. Additionally, removal of the filter was attempted

but unsuccessful. The preceding injuries evidence a defect with the Cook Celect filter implanted in Ms. Beltran.

Ms. Beltran has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$ 110,000**.

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Beltran's claims:

<b>Injury/Defect</b>	<b>Amount</b>
Irretrievable filter (strut remaining in dangerous location)	\$ 75,000
Unsuccessful Percutaneous Retrieval	\$ 22,500
Grade 2 perforation	\$ 12,500
<b>Total:</b>	<b>\$110,000.00</b>

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussions in good faith.

Date: January 5, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

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Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL No.  
2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Henry Jackson

Case No: 1:17-cv-03388

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Henry Jackson (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On September 22, 2017, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 56-year-old man, living in Columbia, Missouri who received a Cook Celect filter on January 29, 2015. Since the filter implantation, Plaintiff has experienced significant defects with his Cook Celect filter including, but not limited to fracture, perforation, and embedment. Additionally, only part of the filter was removed through a complicated percutaneous retrieval procedure, while a fractured leg was left

embedded in IVC wall. The preceding injuries evidence a defect with the Cook Celect filter implanted in Mr. Jackson.

Mr. Jackson has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$323,000**.

Based on her injuries the following values represent the reasonable amount for settlement of Mr. Jackson's claims:

Injury/Defect	Amount
Fracture	\$200,000
Strut remaining in dangerous location (IVC wall)	\$75,000
Associated impact	\$40,000
Embedment	\$8,000
<b>Total</b>	<b>\$323,000</b>

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

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Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

Reuben James

Case No: 1:17-cv-03389

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Reuben James (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On September 22, 2017, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is an 80-year-old man, living in Stone Mountain, Georgia who received a Cook Celect filter on July 26, 2011. Since implantation, Mr. James has suffered significant and severe complications directly attributable to the Cook Celect filter, including:

- Grade 4 perforation of the IVC into the aorta, requiring endovascular aortic repair.
- Filter struts protruding into a vital organ (aorta), creating risk of catastrophic hemorrhage.
- Complex percutaneous retrieval requiring jugular access, snare capture, sheath upsizing, and simultaneous deployment of a Gore aortic cuff.
- Infrarenal IVC stenosis documented on cavogram.
- Multiple perforations consistent with Celect failure mode.

On August 14, 2023, Mr. James underwent endovascular aortic repair (EVAR) with deployment of a 23mm Gore aortic cuff to repair the aortic wall damaged by the filter. The filter was removed only through a complex retrieval technique. These procedures constitute major vascular intervention and demonstrate the severity of the device failure.

Mr. James has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$ 772,500.**

Based on his injuries the following values represent the reasonable amount for settlement or Mr. James' claims:

<b>Injury / Defect</b>	<b>Amount</b>
Grade 4 perforation into aorta (vital organ)	\$40,000
Strut in dangerous location (aorta)	\$75,000
Complex percutaneous retrieval	\$22,500
Endovascular aortic repair (major vascular procedure)	\$600,000
Secondary Grade 4 perforation	\$10,000
Complications	\$25,000
<b>Total</b>	<b>\$772,500</b>

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026

	<p>Respectfully submitted,</p> <p><u>/s/ Taurin J. Robinson, Esq.</u>  Taurin J. Robinson (Bar No. 352197)  The Robinson Law Firm, Prof. Corp.  3055 Wilshire Boulevard, Ste. 980  P (213) 674-7301  F (213) 674-7340  <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a>  Counsel for Plaintiff</p>
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

Desmund Hicks o/b/o, Heron  
Anderson-Cotton, Deceased

Case No: 1:17-cv-03525

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Desmund Hicks, as the substituted party for his deceased mother, Heron Anderson-Cotton (“Plaintiff”), submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On October 2, 2017, Ms. Anderson-Cotton filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al., alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Ms. Anderson-Cotton was a 72-year-old woman, living in Converse, Texas, who received a Cook Celect filter on April 20, 2011.

Since the filter implantation, Ms. Anderson-Cotton experienced significant defects associated with her Cook Celect filter. Imaging demonstrates Grade 2 perforation, with multiple struts projecting beyond the wall of the inferior vena cava. Subsequent studies document extensive thrombosis inferior to the filter, involving the distal IVC, iliac veins, and common femoral veins. Due to chronic clot burden and embedment of the filter limbs, the device was deemed irretrievable, with treating physicians noting that removal would pose an unacceptable risk of caval injury. These findings reflect a device-related abnormality involving perforation, embedment, and permanent irretrievability, all documented in the medical record.

Ms. Anderson-Cotton complied with all procedural requirements during the pendency of her case, including service of the plaintiff fact sheet, medical records, authorizations, and categorization forms. Following her recent passing, her son, Desmond Hicks, will be substituted as Plaintiff pursuant to the applicable rules. Plaintiff now seeks to settle the claims against Defendants for **\$ 45,500**.

Based on the documented injuries, the following values represent the reasonable amount for settlement of Ms. Anderson-Cotton's claims:

<b>Injury/Defect</b>	<b>Amount</b>
Irretrievable filter	\$ 25,000
Grade 2 Perforation	\$ 12,500
Embedment (implied by irretrievability)	\$ 8,000
<b>Total:</b>	<b>\$ 45,500</b>

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this

statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026

	<p>Respectfully submitted,</p> <p><u>/s/ Taurin J. Robinson, Esq.</u></p> <p>Taurin J. Robinson (Bar No. 352197) The Robinson Law Firm, Prof. Corp. 3055 Wilshire Boulevard, Ste. 980 P (213) 674-7301 F (213) 674-7340 <u>robinsonlaw3055@gmail.com</u> Counsel for Plaintiff</p>
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL No.  
2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Betty Estrada

Case No: 1:17-cv-03526

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Betty Estrada (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On October 2, 2017, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 70-year-old woman, living in Clovis, California who received a Cook Gunther Tulip filter on December 19, 2009. Since the filter implantation, Plaintiff has experienced significant defects with her Cook Gunther Tulip filter including, but not limited to perforation, migration, and embedment. Additionally, the

preceding injuries evidence a defect with the Cook Gunther Tulip filter implanted in Ms. Estrada.

Ms. Estrada has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$ 83,000.**

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Estrada's claims:

<b>Injury/Defect</b>	<b>Amount</b>
Erosion of filter through IVC Wall (Grade 4 Perforation)	\$ 25,000
Complications (Pulmonary embolism due to failure of filter)	\$ 50,000
Migration / Embedment	\$ 8,000
<b>Total:</b>	<b>\$83,000.00</b>

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

Taurin J. Robinson (Bar No. 352197)  
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Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-mdl-2570-RLY-TAB MDL  
No. 2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Brittany McGlothin

Case No: 1:17-cv-03528

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Brittany McGlothin (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On October 2, 2017, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 35-year-old woman, living in Ennis, Texas who received a Cook Gunther Tulip filter on January 23, 2008. Since the filter implantation, Plaintiff has experienced significant defects with her Cook Gunther Tulip filter including but not limited to perforation and embedment. Additionally, the filter has been deemed irretrievable. The preceding injuries evidence a defect with the Cook Gunther Tulip

filter implanted in Ms. McGlothin.

Ms. McGlothin has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$118,000**.

Based on her injuries the following values represent the reasonable amount for settlement of Ms. McGlothin's claims:

Irretrievable filter - 75,000 (strut remains in dangerous location)

Unsuccessful Percutaneous Retrieval - 22,500

Grade 2 Perforation - 12,500

Embedment - 8,000

Total: 118,000

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

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Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

Linda Tuschmann o/b/o Anne Bright,  
deceased

Case No: 1:17-cv-03698

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the  
Southern District of Indiana, Indianapolis Division, located at United States Courthouse,  
46 East Ohio Street, Indianapolis, Indiana. Plaintiff Linda Tuschmann o/b/o Anne Bright,  
deceased (“Plaintiff”) submits the following Confidential Settlement Statement in  
preparation for the Settlement Conference, currently scheduled for January 12, 2026, in  
Room #234.

On October 16, 2017, Plaintiff filed her action in MDL No. 2570, on behalf of  
decedent Anne Bright (“Decedent”), against Defendant Cook Incorporated, et al. alleging  
strict products liability failure to warn and design defect, negligence, negligence per se,  
breach of express and implied warranty, and punitive damages. Plaintiff was an 88-year-  
old woman, living in Toms River, New Jersey who received a Cook Celect filter on

September 25, 2012. Plaintiff Anne Bright received a Cook Celect IVC filter on September 25, 2012, following a documented history of deep venous thrombosis and pulmonary embolism. Ms. Bright received a Cook Celect IVC filter on September 25, 2012, following a documented history of deep venous thrombosis and pulmonary embolism. The filter remained in place for more than a decade and was never retrieved. Subsequent imaging repeatedly confirmed the continued presence of the device at the T12–L1 level with calcified chronic thrombus adherent to the filter tip, consistent with long-term indwelling filter changes. No retrieval was attempted, and no physician recommended removal, in part due to Ms. Bright's age, comorbidities, and overall medical fragility.

Although Ms. Bright did not experience fracture, perforation, migration, tilt, or retrieval-related complications, the chronic clot burden at the filter tip represents a device-related abnormality that remained present for years. In accordance with the Cook settlement matrix, the appropriate valuation for the documented findings in this matter is \$6,000, and Plaintiff seeks resolution at this level under the established settlement framework.

Ms. Tuschmann has, since filing and serving her complaint against Defendants, complied with all procedural requirements over the past eight years, including submission of the Plaintiff Fact Sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for \$6,000.

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Bright's claims:

<b>Injury/Defect</b>	<b>Amount</b>
Filter caused excessive clots and blood flow impairment	\$ 6,000
<b>Total:</b>	<b>\$ 6,000</b>

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026

	<p>Respectfully submitted,</p> <p><u>/s/ Taurin J. Robinson, Esq.</u>  Taurin J. Robinson (Bar No. 352197)  The Robinson Law Firm, Prof. Corp.  3055 Wilshire Boulevard, Ste. 980  P (213) 674-7301  F (213) 674-7340  <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a>  Counsel for Plaintiff</p>
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

Marjorie Pearl

Case No: 1:17-cv-03785

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Marjorie Pearl (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On October 19, 2017, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is an 82-year-old woman, living in Westminster, Colorado who received a Cook Gunther Tulip filter on November 10, 2012. Operative records document a high-complexity and ultimately unsuccessful percutaneous retrieval attempt of the Cook Celect IVC filter. Multiple advanced retrieval maneuvers were performed in

sequence. A pigtail catheter was first used to pull the filter hook away from the caval wall, but the hook could not be captured. An En-snare device was then advanced into the cava for repeated attempts, followed by manipulation with a tip-deflection wire in an effort to straighten and mobilize the filter—each attempt unsuccessful. A Bentson wire was subsequently looped beneath the filter hook, allowing a gooseneck snare to engage the wire and finally capture the hook. Although the filter could be partially collapsed within the sheath, the filter legs remained firmly incorporated into the caval wall and could not be released, preventing removal.

The procedure was aborted, and a follow-up venogram confirmed no immediate caval injury. The interventional radiologist concluded that the filter was irretrievable due to deep incorporation of the legs into the IVC wall, even with multiple advanced retrieval techniques. This constitutes a failed percutaneous retrieval procedure, a recognized high-value complication under the Cook settlement matrix and clear evidence of significant device failure with the Cook Gunther Tulip filter implanted in Ms. Pearl.

Ms. Pearl has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$118,000**.

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Pearl's claims:

<b>Injury/Defect</b>	<b>Amount</b>
Irretrievable filter (strut remains in dangerous location)	\$ 75,000
Unsuccessful Percutaneous Retrieval	\$ 22,500
Grade 2 Perforation	\$ 12,500
Embedment	\$ 8,000
<b>Total:</b>	<b>\$ 118,000</b>

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026

	<p>Respectfully submitted,</p> <p><u>/s/ Taurin J. Robinson, Esq.</u>  Taurin J. Robinson (Bar No. 352197)  The Robinson Law Firm, Prof. Corp.  3055 Wilshire Boulevard, Ste. 980  P (213) 674-7301  F (213) 674-7340  <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a>  Counsel for Plaintiff</p>
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL No.  
2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Shirley Stout

Case No: 1:17-cv-04046

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Shirley Stout (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On November 2, 2017, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 72-year-old woman, living in Casper, Wyoming who received a Cook Celect filter on July 2, 2013. Since the filter implantation, Plaintiff has experienced significant defects with her Cook Celect filter including but not limited to perforation. Additionally, the preceding injuries evidence a defect with the Cook Celect

filter implanted in Ms. Stout.

Ms. Stout has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past eight years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for \$ 12,500.

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Stout's claims:

Grade 2 perforation \$ 12,500

**Total: \$ 12,500**

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation.

Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

	<p>Respectfully submitted,</p> <p><u>/s/ Taurin J. Robinson, Esq.</u> Taurin J. Robinson (Bar No. 352197) The Robinson Law Firm, Prof. Corp. 3055 Wilshire Boulevard, Ste. 980 P (213) 674-7301 F (213) 674-7340 <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a> Counsel for Plaintiff</p>
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL  
No. 2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Mania Castile

Case No: 1:19-cv-03353

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Mania Castile (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 7, 2019, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 55-year-old woman, living in Dallas, Texas who received a Cook Celect filter on June 10, 2009. Since the filter implantation, Plaintiff has experienced significant defects with her Cook Celect filter including but not limited to perforation and embedment. Additionally, the preceding injuries evidence a defect with

the Cook Celect filter implanted in Ms. Castile.

Ms. Castile has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$12,500**.

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Castile's claims:

Grade 2 perforation \$ 12,500

Total:                   **\$ 12,500**

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation.

Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

Taurin J. Robinson (Bar No. 352197)  
The Robinson Law Firm, Prof. Corp.  
3055 Wilshire Boulevard, Ste. 980  
P (213) 674-7301  
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robinsonlaw3055@gmail.com  
Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

Randall Hines

Case No: 1:19-cv-03366

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Randall Hines (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 8, 2019, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 62-year-old man, living in Scottsburrough, Alabama who received a Cook Gunther Tulip filter on October 14, 2008. Since the filter implantation, Plaintiff has experienced significant defects with his Cook Gunther Tulip filter including but not limited to perforation. Additionally, the preceding injuries evidence a defect with

the Cook Gunther Tulip filter implanted in Mr. Hines.

Mr. Hines has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle his claims against Defendants for **\$ 12,500**.

Based on his injuries the following values represent the reasonable amount for settlement of Mr. Hines's claims:

<u>Injury/Defect</u>	<u>Amount</u>
Grade 2 perforation	\$ 12,500
<b>Total:</b>	<b>\$ 12,500</b>

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026

	Respectfully submitted,  <u>/s/ Taurin J. Robinson, Esq.</u> Taurin J. Robinson (Bar No. 352197) The Robinson Law Firm, Prof. Corp. 3055 Wilshire Boulevard, Ste. 980 P (213) 674-7301 F (213) 674-7340 <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a> Counsel for Plaintiff
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL No.  
2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

William Porritt

Case No: 1:19-cv-03369

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff William Porritt (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 8, 2019, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 61-year-old man, living in Springfield, Virginia who received a Cook Gunther Tulip filter on April 16, 2004. Since the filter implantation, Plaintiff has experienced significant defects with his Cook Gunther Tulip filter including but not limited to perforation. Additionally, the preceding injuries evidence a defect with

the Cook Gunther Tulip filter implanted in Mr. Porritt.

Mr. Porritt has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle his claims against Defendants for \$ 12,500.

Based on his injuries the following values represent the reasonable amount for settlement of Mr. Porritt's claims:

Grade 2 perforation \$ 12,500

**Total: \$ 12,500**

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

	Respectfully submitted,  <u>/s/ Taurin J. Robinson, Esq.</u> Taurin J. Robinson (Bar No. 352197) The Robinson Law Firm, Prof. Corp. 3055 Wilshire Boulevard, Ste. 980 P (213) 674-7301 F (213) 674-7340 <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a> Counsel for Plaintiff
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

Todd Gabryszak

Case No: 1:19-cv-03372

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Todd Gabryszak (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 8, 2019, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 78-year-old man, living in Laurel, Maryland who received a Cook Celect filter on May 2, 2006.

Since the filter implantation, Plaintiff has experienced significant defects with his Cook Celect filter, including a strut extending beyond the wall of the inferior vena cava

and projecting posterior to the stented abdominal aorta, consistent with Grade 4 perforation and embedment. Imaging confirms that the filter remains in place with one leg positioned in a dangerous location adjacent to the aorta, creating a persistent risk profile associated with long-term indwelling filter complications. These findings reflect a device-related defect in the Cook Celect filter implanted in Mr. Gabryszak.

Mr. Gabryszak has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for \$ 198,000.

Based on her injuries the following values represent the reasonable amount for settlement of Mr. Gabryszak's claims:

<b>Injury/Defect</b>	<b>Amount</b>
Extensive penetration into aorta; filter prong is close to heart (strut remains in dangerous location)	\$ 100,000
Grade 4 perforation into aorta	\$ 30,000
Above impact: life threatening injury caused by filter defect	\$ 60,000
Embedment	\$ 8,000
<b>Total:</b>	<b>\$198,000.00</b>

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

Taurin J. Robinson (Bar No. 352197)  
The Robinson Law Firm, Prof. Corp.  
3055 Wilshire Boulevard, Ste. 980  
P (213) 674-7301  
F (213) 674-7340  
[robinsonlaw3055@gmail.com](mailto:robinsonlaw3055@gmail.com)  
Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL No.  
2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Robert Sheard, Jr.

Case No: 1:19-cv-03373

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Robert Sheard, Jr. ("Plaintiff") submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 8, 2019, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 70-year-old man, living in Long Beach, California who received a Cook Gunther Tulip filter on July 28, 2003. Since the filter implantation, Plaintiff has experienced significant defects with his Cook Gunther Tulip filter including but not limited to perforation. Additionally, the preceding injuries evidence a defect with

the Cook Gunther Tulip filter implanted in Mr. Sheard, Jr..

Mr. Sheard, Jr. has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle his claims against Defendants for \$ 12,500.

Based on his injuries the following values represent the reasonable amount for settlement of Mr. Sheard, Jr's claims:

Grade 2 perforation \$ 12,500

**Total: \$ 12,500**

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

	Respectfully submitted,  <u>/s/ Taurin J. Robinson, Esq.</u> Taurin J. Robinson (Bar No. 352197) The Robinson Law Firm, Prof. Corp. 3055 Wilshire Boulevard, Ste. 980 P (213) 674-7301 F (213) 674-7340 <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a> Counsel for Plaintiff
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

William Homsher

Case No: 1:19-cv-03374

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff William Homsher (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On October 5, 2019, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 63-year-old man, living in Cincinnati, Ohio who received a Cook Celect filter on April 26, 2013. Imaging demonstrates that Mr. Homsher’s Cook Celect IVC filter has developed significant multi-strut perforation with prominent posterior tilt. Multiple struts extend 4–6 mm beyond the wall of the inferior vena cava,

with several struts abutting adjacent organs and vascular structures, including a mesenteric branch vessel, the posterior wall of the duodenum, the abdominal aorta, and small lumbar vessels. The filter shows a 14-degree posterior tilt with the apex contacting the posterior caval wall, consistent with tilt and embedment. These findings reflect a multi-strut, multi-organ perforation pattern and structural instability characteristic of Cook Celect device failure.

Mr. Homsher has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$ 20,500**.

Based on her injuries the following values represent the reasonable amount for settlement of Mr. Homsher's claims:

Injury / Defect	Amount
Grade 2 perforation (multiple struts perforating 4–6 mm beyond IVC wall)	\$12,500
Migration / Tilt / Embedment (posterior tilt with apex contacting posterior caval wall)	\$8,000
Included within Grade 2 perforation category (multiple struts abutting adjacent organs [duodenum, mesenteric vessel, aorta, lumbar vessels])	—
<b>Total</b>	<b>\$20,500</b>

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026

	<p>Respectfully submitted,</p> <p><u>/s/ Taurin J. Robinson, Esq.</u></p> <p>Taurin J. Robinson (Bar No. 352197) The Robinson Law Firm, Prof. Corp. 3055 Wilshire Boulevard, Ste. 980 P (213) 674-7301 F (213) 674-7340 <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a> Counsel for Plaintiff</p>
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

Jose Salvatierra

Case No: 1:19-cv-03375

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Jose Salvatierra (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 8, 2019, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 68-year-old man, living in Lake Elsinore, California who received a Cook Celect filter on April 25, 2011. Imaging demonstrates a Cook Celect IVC filter with multi-directional perforation and involvement of multiple structures. The anterior strut perforates the IVC and abuts the right common iliac artery. The posterior

strut perforates the IVC and contacts the anterior surface of the L4 vertebral body. A left lateral strut extends into the left L4 lumbar vein. Additional struts extend 5–8 mm beyond the caval wall, and the filter shows a 5–6 degree tilt. These findings reflect a multi-strut, multi-organ perforation pattern consistent with significant Cook Celect device failure.

Mr. Salvatierra has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$130,000**.

Based on her injuries the following values represent the reasonable amount for settlement of Mr. Salvatierra's claims:

Injury/Defect	Amount
Strut in dangerous location (artery)	\$75,000
Grade 3–4 perforation (vertebral body)	\$17,500–\$25,000
Strut in lumbar vein (second location)	\$15,000
Grade 2–3 perforation (Multi-strut perforation (5–8 mm beyond IVC wall))	\$12,500
Migration / Tilt / Embedment	\$8,000
Total	\$128,000 – \$135,500

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of

avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026	Respectfully submitted,  <u>/s/ Taurin J. Robinson, Esq.</u> Taurin J. Robinson (Bar No. 352197) The Robinson Law Firm, Prof. Corp. 3055 Wilshire Boulevard, Ste. 980 P (213) 674-7301 F (213) 674-7340 <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a> Counsel for Plaintiff
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL  
No. 2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Shirley Dunlap

Case No: 1:19-cv-03386

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Shirley Dunlap (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 9, 2019, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 56-year-old woman, living in Atlanta, Georgia who received a Cook Celect filter on December 27, 2010. Since the filter implantation, Plaintiff has experienced significant defects with her Cook Celect filter including, but not limited to, perforation, embedment, and a vertically bent strut. The preceding injuries

evidence a defect with the Cook Celect filter implanted in Ms. Dunlap.

Ms. Dunlap has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$ 163,500.**

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Dunlap's claims:

<b>Injury/Defect</b>	<b>Amount</b>
Bent strut remaining in dangerous location: distal abdominal aorta	\$ 85,000
Grade 4 Perforation into distal abdominal aorta	\$ 30,500
Associated impact of above defect	\$ 40,000
Embedment	\$ 8,000
<b>Total:</b>	<b>\$163,500.00</b>

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

Taurin J. Robinson (Bar No. 352197)  
The Robinson Law Firm, Prof. Corp.  
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[robinsonlaw3055@gmail.com](mailto:robinsonlaw3055@gmail.com)  
Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

Vonda Webb

Case No: 1:19-cv-03387

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Vonda Webb (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 9, 2019, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 70-year-old woman, living in Cuthbert, Georgia who received a Cook Celect filter on April 20, 2013. Imaging demonstrates that Ms. Webb’s Cook Celect IVC filter has caused extensive multi-strut Grade 4 perforation with direct involvement of multiple critical structures. Four struts extend 4–4.6 mm beyond the wall

of the inferior vena cava, with one strut perforating the anterior L3 vertebral body and producing cystic changes within the bone, indicating chronic mechanical erosion. Additional struts abut the posterior duodenum, contact the abdominal aorta, and extend into surrounding retroperitoneal tissues. These findings reflect a dangerous, multi-organ perforation pattern with vertebral penetration and structural compromise, representing one of the most severe forms of Cook Celect device failure short of fracture or open surgical intervention.

Ms. Webb has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$ 182,500**.

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Webb's claims:

Injury / Defect	Amount
Grade 4 perforation impacting adjacent organ/structure (strut perforating L3 vertebral body with cystic change)	<b>\$40,000</b>
Strut in dangerous location (non-cardiac) (strut in dangerous location [vertebral body/spine])	<b>\$75,000</b>
Grade 4 perforation (multi-strut) (four struts perforating 4–4.6 mm beyond IVC wall)	<b>\$25,000</b>
Grade 3 perforation (strut abutting posterior duodenum)	<b>\$17,500</b>

<b>Injury / Defect</b>	<b>Amount</b>
Grade 2 perforation (×2) (two additional perforating struts)	<b>\$25,000</b>
Total	<b>182,500</b>

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026

	<p>Respectfully submitted,</p> <p><u>/s/ Taurin J. Robinson, Esq.</u>  Taurin J. Robinson (Bar No. 352197)  The Robinson Law Firm, Prof. Corp.  3055 Wilshire Boulevard, Ste. 980  P (213) 674-7301  F (213) 674-7340  <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a>  Counsel for Plaintiff</p>
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

James Swayze

Case No: 1:19-cv-03391

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff James Swayze (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 9, 2019, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 47-year-old man, living in Springdale, Arkansas who received a Cook Gunther Tulip filter on January 18, 2008. Since the filter implantation, Plaintiff has experienced significant defects with his Cook Gunther Tulip filter including but not limited to perforation. Additionally, the preceding injuries evidence a defect with

the Cook Gunther Tulip filter implanted in Mr. Swayze.

Mr. Swayze has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for \$ 12,500.

Based on her injuries the following values represent the reasonable amount for settlement of Mr. Swayze's claims:

Grade 2 perforation \$ 12,500

**Total: \$ 12,500**

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

	Respectfully submitted,  <u>/s/ Taurin J. Robinson, Esq.</u> Taurin J. Robinson (Bar No. 352197) The Robinson Law Firm, Prof. Corp. 3055 Wilshire Boulevard, Ste. 980 P (213) 674-7301 F (213) 674-7340 <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a> Counsel for Plaintiff
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB MDL  
No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

Lillie Morris

Case No: 1:19-cv-03392

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Lillie Morris ("Plaintiff") submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 9, 2019, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 76-year-old woman, living in Scottsdale, Arizona who received a Cook Gunther Tulip filter on April 2, 2015. Since the filter implantation, Plaintiff has experienced significant defects with her Cook Gunther Tulip filter including, but not limited to perforation, tilt, and embedment. The preceding injuries evidence a

defect with the Cook Gunther Tulip filter implanted in Ms. Morris.

Ms. Morris has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$20,500**.

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Morris's claims:

Grade 2 perforation - 12,500

Tilt / Embedment - 8,000

Total: 20,500

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

Taurin J. Robinson (Bar No. 352197)  
The Robinson Law Firm, Prof. Corp.  
3055 Wilshire Boulevard, Ste. 980  
P (213) 674-7301  
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[robinsonlaw3055@gmail.com](mailto:robinsonlaw3055@gmail.com)  
Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL No.  
2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Yolanda Harper-Smith

Case No: 1:19-cv-03403

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Yolanda Harper-Smith (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 9, 2019, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 62-year-old woman, living in Columbia, South Carolina who received a Cook Celect filter on July 16, 2012. Since the filter implantation, Plaintiff has experienced significant defects with her Cook Celect filter including but not limited to perforation. The preceding injuries evidence a defect with the Cook Celect

filter implanted in Ms. Harper-Smith.

Ms. Harper-Smith has, since filing and serving her complaint against Defendants and complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms Plaintiff now seeks to settle her claims against Defendants for **\$28,500.00**.

Based on his injuries the following values represent the reasonable amount for settlement or Ms. Harper-Smith's claims:

<b>Injury/Defect</b>	<b><u>Amount</u></b>
Grade 2 perforation	\$ 12,500
Above impact: pain and suffering from filter perforation	\$ 8,000
Embedment	\$ 8,000
<b>Total:</b>	<b>\$28,500.00</b>

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

Taurin J. Robinson (Bar No. 352197)  
The Robinson Law Firm, Prof. Corp.  
3055 Wilshire Boulevard, Ste. 980  
P (213) 674-7301  
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[robinsonlaw3055@gmail.com](mailto:robinsonlaw3055@gmail.com)  
Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL No.  
2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Anthony Jones

Case No: 1:19-cv-03407

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Anthony Jones ("Plaintiff") submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 9, 2019, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 67-year-old man, living in Kinnelon, New Jersey who received a Cook Gunther Tulip filter on August 24, 2009. Since the filter implantation, Plaintiff has experienced significant defects with his Cook Gunther Tulip filter including, but not limited to perforation, tilt, embedment and embedment in his spine and

reperitoneal fat. Additionally, the preceding injuries evidence a defect with the Cook Gunther Tulip filter implanted in Mr. Jones.

Mr. Jones has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$150,000**.

Based on his injuries the following values represent the reasonable amount for settlement or Mr. Jones's claims:

Injury / Defect	Value
Strut in dangerous location (vertebral body)	\$75,000
Grade 4 perforation into vertebral body	\$25,000–\$40,000
Second strut in different location	\$15,000
Grade 3–4 perforation into retroperitoneum	\$12,500–\$25,000
Migration / Tilt / Embedment	\$8,000
<b>Estimated Total (Range)</b>	<b>\$135,500 – \$163,000</b>

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

Taurin J. Robinson (Bar No. 352197)  
The Robinson Law Firm, Prof. Corp.  
3055 Wilshire Boulevard, Ste. 980  
P (213) 674-7301  
F (213) 674-7340  
robinsonlaw3055@gmail.com  
Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

**Case No. 1:14-md-2570-RLY-TAB MDL No.  
2570**

**MAGISTRATE JUDGE TIM A. BAKER**

This Document Relates to Plaintiff:

Elvin Shane Turner

Case No: 1:19-cv-03408

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Elvin Shane Turner (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 9, 2019, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 61-year-old man, living in Orem, Utah who received a Cook Gunther Tulip filter on June 20, 2006. Since the filter implantation, Plaintiff has experienced significant defects with his Cook Gunther Tulip filter including but not limited to perforation and tilt. Additionally, the preceding injuries evidence a defect with

the Cook Gunther Tulip filter implanted in Mr. Turner.

Mr. Turner has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for **\$ 20,500**.

Based on her injuries the following values represent the reasonable amount for settlement of Mr. Turner's claims:

Grade 2 perforation                    \$ 12,500

Tilt / Embedment                    \$ 8,000

**Total:**                                **\$ 20,500**

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 5, 2026

	Respectfully submitted,  <u>/s/ Taurin J. Robinson, Esq.</u> Taurin J. Robinson (Bar No. 352197) The Robinson Law Firm, Prof. Corp. 3055 Wilshire Boulevard, Ste. 980 P (213) 674-7301 F (213) 674-7340 <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a> Counsel for Plaintiff
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

Diana Voorhies Foster

Case No: 1:19-cv-03410

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Diana Voorhies Foster (“Plaintiff”) submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 9, 2019, Plaintiff filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 71-year-old woman, living in Las Vegas, Nevada who received a Cook Gunther Tulip filter on January 19, 2012. Imaging demonstrates that Ms. Voorhies Foster’s Cook Günther Tulip filter has developed multi-strut perforation with both anterior and posterior struts extending beyond the wall of the inferior vena cava.

Two struts are documented as penetrating the caval wall—one anteriorly and one posteriorly—with the posterior strut extending toward the midline behind the aortic bifurcation. The filter also demonstrates approximately 15 degrees of lateral tilt, consistent with device instability and early embedment. These findings reflect a multi-directional perforation pattern and structural distortion characteristic of Günther Tulip device failure.

Ms. Voorhies Foster has, since filing and serving her complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for \$ **20,500**.

Based on her injuries the following values represent the reasonable amount for settlement of Ms. Voorhies Foster's claims:

<u>Injury / Defect</u>	<u>Amount</u>
Grade 2 perforation	\$12,500
Tilt / Migration	\$8,000
<b>Total:</b>	<b>\$20,500</b>

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the

interest of avoiding further costs, time and expense associated with further litigation.

Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026	Respectfully submitted,  <u>/s/ Taurin J. Robinson, Esq.</u> Taurin J. Robinson (Bar No. 352197) The Robinson Law Firm, Prof. Corp. 3055 Wilshire Boulevard, Ste. 980 P (213) 674-7301 F (213) 674-7340 <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a> Counsel for Plaintiff
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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

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IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

Michael Hamsley

Case No: 1:19-cv-03411

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Michael Hamsley ("Plaintiff") submits the following Confidential Settlement Statement in preparation for the Settlement Conference, currently scheduled for January 12, 2026, in Room #234.

On August 9, 2019, Plaintiff filed his action in MDL No. 2570 against Defendant Cook Incorporated, et al. alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. Plaintiff is a 51-year-old man, living in Smyrna, Georgia who received a Cook Celect filter on October 19, 2011.

Since the filter implantation, Plaintiff has experienced significant defects associated with his Cook Celect filter. Imaging demonstrates Grade 2 perforation, with

multiple struts projecting beyond the wall of the inferior vena cava, as well as embedment of the device. In 2018, an attempted retrieval was performed but was unsuccessful, and the filter was determined to be irretrievable. Due to chronic IVC and iliac venous occlusion, the interventional radiologist performed endovascular reconstruction and stented the IVC alongside the indwelling filter, which remains permanently in place. These findings reflect a device-related abnormality involving perforation, embedment, and irretrievability, all documented in the medical record.

Mr. Hamsley has, since filing and serving his complaint against Defendants, complied with all the procedural requirements for the past six years, including serving the plaintiff fact sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle his claims against Defendants for **\$ 68,000**.

Based on his injuries the following values represent the reasonable amount for settlement of Mr. Hamsley's claims:

<b>Injury/Defect</b>	<b>Amount</b>
Irretrievable filter	\$ 25,000
Unsuccessful Percutaneous Retrieval	\$ 22,500
Grade 2 perforation	\$ 12,500
Embedment	\$ 8,000
<b>Total:</b>	<b>\$ 68,000</b>

Plaintiff's medical records supporting his damages including his IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026

Respectfully submitted,

/s/ Taurin J. Robinson, Esq.

Taurin J. Robinson (Bar No. 352197)

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Counsel for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

---

IN RE: COOK MEDICAL, INC., IVC  
FILTERS MARKETING, SALES  
PRACTICES AND PRODUCTS  
LIABILITY LITIGATION

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**Case No. 1:14-md-2570-RLY-TAB  
MDL No. 2570**

**MAGISTRATE JUDGE TIM A.  
BAKER**

This Document Relates to Plaintiff:

Thomas Stewart o/b/o Tammy Stewart

Case No: 1:20-cv-03079

**CONFIDENTIAL SETTLEMENT STATEMENT**

TO THE HONORABLE MAGISTRATE JUDGE TIM A. BAKER of the Southern District of Indiana, Indianapolis Division, located at the United States Courthouse, 46 East Ohio Street, Indianapolis, Indiana. Plaintiff Thomas Stewart, who will be substituted for Tammy Stewart (now deceased) ("Plaintiff"), submits the following Confidential Settlement Statement in preparation for the Settlement Conference currently scheduled for January 12, 2026, in Room #234.

On August 9, 2019, Ms. Stewart originally filed her action in MDL No. 2570 against Defendant Cook Incorporated, et al., alleging strict products liability failure to warn and design defect, negligence, negligence per se, breach of express and implied warranty, and punitive damages. In 2020, she refiled her action due to technical deficiencies in the documentation associated with her original claim. Ms. Stewart was a 65-year-old woman living in Gulf Shores, Alabama who received a Cook Celect filter on

September 18, 2014. She has since passed away, and her claim will proceed through her surviving spouse, Thomas Stewart, who will be substituted as the representative of her estate upon completion of the required filings.

Imaging confirms that Ms. Stewart's Cook Celect IVC filter had developed multi-directional Grade 4 perforation involving several adjacent structures. Multiple distal anchoring struts extend beyond the wall of the inferior vena cava, with one strut approximating the small bowel loop anteriorly, another contacting the right margin of the abdominal aorta, and a third extending posteriorly to the anterior surface of the psoas major muscle. These findings reflect a three-point, multi-organ perforation pattern, each representing direct contact with critical anatomic structures. This constellation of injuries represents one of the most severe forms of Cook Celect device failure short of open surgical intervention.

Ms. Stewart complied with all procedural requirements during the pendency of her case, including serving the Plaintiff Fact Sheet, medical records, authorizations, and categorization forms. Plaintiff now seeks to settle her claims against Defendants for \$195,000. Based on her injuries, the following values represent the reasonable amount for settlement of Ms. Stewart's claims:

<b>Injury/Defect</b>	<b>Amount</b>
Grade 4 perforation into aorta	<b>\$25,000</b>
Associated impact	<b>\$40,000</b>
Grade 4 perforation into small bowel loop	<b>\$25,000</b>
Associated impact	<b>\$40,000</b>
Grade 4 perforation into psoas major muscle	<b>\$25,000</b>
Associated impact	<b>\$40,000</b>
<b>Total</b>	<b>195,000</b>

Plaintiff's medical records supporting her damages including her IVC filter implant and injury records are attached hereto as **Exhibit A**. As of the date of this statement, we have not received any reasonable settlement offers from Defendants. In the interest of avoiding further costs, time and expense associated with further litigation. Plaintiff is willing to conduct settlement discussion in good faith.

Date: January 6, 2026

	<p>Respectfully submitted,</p> <p><u>/s/ Taurin J. Robinson, Esq.</u></p> <p>Taurin J. Robinson (Bar No. 352197) The Robinson Law Firm, Prof. Corp. 3055 Wilshire Boulevard, Ste. 980 P (213) 674-7301 F (213) 674-7340 <a href="mailto:robinsonlaw3055@gmail.com">robinsonlaw3055@gmail.com</a> Counsel for Plaintiff</p>
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