

EXHIBIT A

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

IN RE: PROPULSID
PRODUCTS LIABILITY LITIGATION

MDL NO. 1355

SECTION L

JUDGE FALLON

MAG. JUDGE AFRICK

THIS DOCUMENT RELATES TO ALL CASES

AGREEMENT TO MAINTAIN CONFIDENTIALITY

The undersigned agrees:

I hereby attest to my understanding that information or documents designated Confidential are provided to me subject to Pretrial Order No. 5, dated November 29, 2000, in the above-captioned litigation; that I have been given a copy of and have read Pretrial Order No. 5, and that I agree to be bound by its terms. I also understand that my execution of this Agreement to Maintain Confidentiality, indicating my agreement to be bound by Pretrial Order 5, is a prerequisite to my review of any information or documents designated as confidential pursuant to Pretrial Order No. 5.

I further agree that I shall not disclose to others, except in accord with Pretrial Order No. 5, any Confidential Discovery Material, as defined therein, or any information contained in such Confidential Discovery Material, in any form whatsoever, and that such

Confidential Discovery Material and the information contained therein may be used only for the purposes authorized by Pretrial Order No. 5.

I further agree and attest to my understanding that my obligation to honor the confidentiality of such Confidential Discovery Material and information will continue even after this litigation concludes.

I further agree that if I fail to abide by the terms of Pretrial Order No. 5, I will be subject to the jurisdiction of the United States District Court for the Eastern District of Louisiana for the purposes of any proceedings relating to enforcement of Pretrial Order No. 5.

Date: _____

By: _____

Subscribed and sworn to before me this
_____ day of _____.

Notary Public