

EXHIBIT A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

<u>In Re: Actos (Pioglitazone) Products</u>)	MDL NO. 6:11-md-2299
Liability Litigation)	
)	JUDGE DOHERTY
)	
This Document Applies to:)	MAGISTRATE JUDGE HANNA
)	
All Cases)	
)	
)	
)	
)	
)	

NONDISCLOSURE AND CONFIDENTIALITY AGREEMENT

I, _____, state the following:

1. I have read and I understand the Protocol Relating to the Production of Electronically Stored Information and Order in the above-captioned action (a copy of which is attached and whose definitions are incorporated herein) and I attest to my understanding that access to information of the Parties may be provided to me and that such access shall be governed by the terms and conditions and restrictions of the Order. I agree to be bound by the terms of the Order and hereby subject myself to the jurisdiction of the Court for all purposes related to the Order.

2. I shall not use or disclose any information to others, except in accordance with Order. I also understand that, in the event that I fail to abide by the terms of this Nondisclosure and Confidentiality Agreement and/or Order, I may be subject to sanctions by way of contempt of court and to separate legal and equitable recourse by the Parties.

3. I will comply with all of the provisions of the Order. I will hold in confidence, will not disclose to anyone not qualified under the Order, and will use only for the purposes authorized under the Order for the above-captioned litigation any information that is disclosed to me.

4. I understand that my agreement survives the termination of the above-captioned litigation, whether by settlement or other termination. I therefore understand such termination shall not relieve me from any of the continuing obligations of confidentiality imposed by the Order.

5. I hereby submit to the jurisdiction of the United States District Court to the extent allowed by law and to the full extent determined by the United States District Court for the purpose of enforcement of this Nondisclosure and Confidentiality Agreement and the Order.

Signature

Printed Name and Address

Date