APPENDIX B-4: THERASPHERE PERFORMANCE ALLEGATIONS

TO: Case File Memo – Anderson v. Boston Scientific (NYSE: BSX) & Aaron Clark
FROM: Narin Anderson
DATE: October 12, 2025
RE: Context and Rebuttal Regarding Recent Therasphere Performance Allegation

EXECUTIVE SUMMARY

This correspondence from October 2025 reveals a marked escalation in managerial tone and structure. Aaron's feedback, though framed as technical critique, reads as deliberate "record-building" to justify disciplinary action. The message substitutes collaborative problem-solving with formalized liability language, invoking traceability and accountability terminology consistent with HR documentation practices rather than engineering dialogue. Its timing—months after Narin's June 2025 internal complaint and just before counsel notification—suggests retaliatory narrative construction designed to establish "just cause" ahead of potential legal exposure.

This memorandum provides essential context to the most recent performance allegations raised by my manager, Aaron Clark, on October 9, 2025. It is a continuation of the exact pattern of conduct that forms the basis of this entire case: Aaron is fabricating a narrative of poor performance by deliberately ignoring context, disregarding my documented priorities, and creating a formal record of subjective and unsubstantiated criticisms. He is actively building a case to terminate me for cause.

More importantly, it demonstrates that my professional situation has become untenable. The daily stress of navigating this hostile environment while being forced to meticulously document every interaction to protect myself is not sustainable.

1. Factual Background and Proactive Engagement

Aaron Clark's critique conveniently ignores the objective facts of my workload and my proactive efforts to support the Therasphere project despite significant constraints.

- Official Allocation: As Aaron himself documented in his October 12 email, my official 2025 allocation for the Therasphere project is 0.1 FTE (10% of my time). My primary responsibilities are Ranger 035 (0.5 FTE) and Immunobead (0.2 FTE). I have acted accordingly, prioritizing my work based on these official company allocations.
- Work-Related Travel: The perceived delay in my response was a direct result of my professional obligations. I was traveling for work to Alabama at Evonik from October 1-3, followed immediately by a mandatory, week-long planning session from October 6-10.
- Proactive Scheduling: Despite being fully booked for two consecutive weeks, I took the initiative to schedule meetings with the Therasphere team at the earliest possible time slots and had already

prepared a proposal with options to address their needs. This demonstrates proactive ownership, not negligence.

2. Rebuttal of Specific Allegations

Aaron's allegations are a clear attempt to manufacture a pretext for my termination by misrepresenting the facts.

- On "Prioritization and Urgency": To criticize my prioritization of a 0.1 FTE project while I was successfully meeting the demands of my 0.5 and 0.2 FTE projects is fundamentally unreasonable. His statement that "Allocations are a starting point, not a boundary" is an admission of a subjective and undefinable management standard designed to ensure my failure. He is moving the goalposts in bad faith.

- On "Execution and Communication": Regarding the specific issue of the carton label inspection, a minor documentation oversight occurred at the technician level. As the lead for the workstream, I take ultimate responsibility for ensuring all tasks are completed, which is why I previously referred to it as a "mix-up in communication" in my October 10 email—to acknowledge the issue without casting blame on a subordinate. However, Aaron has chosen to magnify this minor, correctable oversight into "fundamental deficiencies" and "missing traceability," a wildly disproportionate and punitive characterization that is transparently pretextual.

3. Conclusion: A Clear and Final Act of Retaliation

These allegations are not an isolated incident. They are the final, documented proof of the retaliatory campaign I have faced since formally complaining about discrimination and fabrication of my performance records in the spring of 2025.

My manager has ignored objective facts (FTE allocation), my professional commitments (work travel), and my proactive efforts (scheduling meetings, preparing options). Instead, he has chosen to magnify a minor subordinate error into a terminal performance failure.

This demonstrates a clear and malicious intent to build a file against me. His actions are not performance management; they are harassment. This has created an untenable work environment and confirms that my continued employment at Boston Scientific is impossible. These events serve as the immediate and final justification for seeking formal legal remedy.