

# St. Jude Medical (an Abbott Laboratories Company)

Abbott Laboratories  
Legal Division  
233 S. Wacker Drive, Floor 25  
Chicago, Illinois 60606  
Telephone: 224-668-0819

October 10, 2024

USCIS

**Attn: I-129 H-1B (Box 88777)**

131 S. Dearborn St.

3rd Floor

Chicago, IL 60603-5517

## **FORM I-129, PETITION FOR A NONIMMIGRANT WORKER**

Petition: I-129, Petition for a Nonimmigrant Worker  
Petitioner: St. Jude Medical, Cardiology Division, Inc.  
(an Abbott Laboratories Company)  
Beneficiary: Mr. Tarini Prasad Samanta  
Position: Chief Software Engineer

Dear Sir or Madam:

This letter is submitted in support of the petition of St. Jude Medical, Cardiology Division, Inc. (an Abbott Laboratories Company), to continue to classify Mr. Tarini Prasad Samanta as an H-1B nonimmigrant of distinguished merit and ability to serve as Chief Software Engineer for our company on a temporary basis.

The standard of proof applied in H-1B nonimmigrant petitions is the preponderance of the evidence standard. As such, the petitioner must present evidence that leads the adjudicating officer to believe that the claim is "probably true" or "more likely than not," which is defined as greater than 50% likely by *U.S. v. Cardozo-Fonseca*, 480 U.S. 421 (1987). As defined by USCIS, "even if the director has some doubt as to the truth, if the petitioner submits relevant, probative, and credible evidence that leads the director to believe that the claim is "probably true" or "more likely than not," the applicant or petitioner has satisfied the standard of proof." (Adjudicator's Field Manual - Redacted Public Version \ Chapter 11 Evidence, \ 11.1 Submission of Supporting Documents and Consideration of Evidence. 11.1 Submission of Supporting Documents and Consideration of Evidence. [Section (n) added as of 8/26/2010; PM-602-007, AD10-43]. In consideration of this standard, Mr. Samanta is clearly qualified for the benefits sought herein and we seek your approval so that she may continue in this crucial role with the organization.

**St. Jude Medical (an Abbott Laboratories Company) and the Corporate Relationship**

St. Jude Medical develops medical technology and services that focus on putting more control into the hands of those who treat cardiac, neurological, and chronic pain patients worldwide. The company is dedicated to advancing the practice of medicine by reducing risk wherever possible and contributing to successful outcomes for every patient.

St. Jude Medical has four major focus areas that include cardiac rhythm management, atrial fibrillation, cardiovascular, and neuromodulation. The St. Jude Medical product portfolio includes implantable cardioverter defibrillators (ICDs), cardiac resynchronization therapy (CRT) devices, pacemakers, electrophysiology catheters, mapping and visualization systems, vascular closure devices, structural heart products, spinal cord stimulation and deep brain stimulation devices.

In 2017, Abbott Laboratories acquired St. Jude Medical. Please find enclosed Abbott Laboratories' Annual Report and additional information about the company from Abbott's website, as well as a Press Release regarding purchase of St. Jude Medical.

Currently #77 on the Fortune 500 list, Abbott is a Top 200 company with 114,000 employees in over 160 countries – scientists, technologists, and engineers as well as professionals in marketing, sales, quality, manufacturing, research and development and global distribution. As such, Abbott has been listed as one of *Fortune's* Most Admired Companies since 1984. The Dow Jones Sustainability Index has listed Abbott for 19 years. In 2023, Abbott achieved worldwide sales of more than \$40.1 Billion and net earnings of \$5.7 Billion. Abbott's success stems from a disciplined focus on four (4) core growth strategies: internal research and development, market expansion, external collaborations, and targeted acquisitions.

Abbott is a globally recognized company that produces medical technologies for structural heart valve repair and replacement; self-tests for diabetes; medical diagnostic instruments, tests, automation and informatics solutions for hospitals, reference labs, blood centers, emergency departments, physician offices and clinics; specialized devices for people suffering from chronic pain and movement disorders, and nutrition products; and medicines in gastroenterology, women's health, cardiovascular, pain management/central nervous system disorders, respiratory, influenza vaccine and more. Abbott is committed to promoting good health and creating breakthrough products around the world – in diagnostics, medical devices, nutrition, and branded generic pharmaceuticals. *See Abbott Laboratories Corporate and Financial Information and Press Release regarding purchase of St. Jude Medical, Submitted as Exhibit 1.*

St. Jude Medical, Cardiology Division, Inc. (an Abbott Laboratories Company) only selects highly qualified individuals for specialized positions in its complex and highly regulated operations, which focus on innovating and providing high-quality services to our customers. All levels of our organization must meet a high standard and the highly qualified employees we select for our Chief Software Engineer positions are no exception. Accordingly, a review of Mr. Samanta's qualifications clearly demonstrates that she is fully qualified for the position of Chief Software Engineer. Further, the role fits within the classification of specialty occupation, as it requires an individual with specialized knowledge and expertise, which can only be obtained through the completion of a bachelor's degree or higher in a specific specialty.

#### Alien's Nonimmigrant History

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Mr. Samanta is currently present and employed in the US pursuant to H1B nonimmigrant classification with validity dates of 01/28/2022 to 01/27/2025. Additionally, Mr. Samanta is the beneficiary of an approved I-140, Immigrant Petition for Alien Worker filed on his behalf by St. Jude Medical (an Abbott Laboratories Company). As such, he is eligible for a three-year extension beyond the six-year limitation, as there are currently no visas available in this category (EB3 India with priority date of 02/06/2015). The period of time sought is to correspond with the enclosed Labor Condition Application (LCA). See I-94 Record, Passport Biographical Page, US Visa, Prior L-1 Visas, H-1B Notices of Approval, I-140 Notice of Approval, Recent Paystubs, Submitted as Exhibit 2.

### The Position Offered

We wish to continue to temporarily employ Mr. Samanta as a Chief Software Engineer with St. Jude Medical, Cardiology Division, Inc. (an Abbott Laboratories Company) at our office in Sunnyvale, California. In this position, he will be responsible for project planning, estimation, scheduling and technical leadership in different projects across clients, geographies and domains.

More specifically, Mr. Samanta will continue to be responsible for the following:

- Work on Integration of Aveir application on Remote care.
- Serve as the first engineer on all projects by single handedly prototyping and analyzing potential pitfalls of various design approaches to aid critical design / architecture decisions.
- Contribute leadership experience toward scheduling, feature prioritization and bug triage.
- Collaborate with third party vendors, analyzed their deliverables for compliance and notified the CCB (Change Control Board) of any impact.
- Coordinate between the onsite and offshore development and verification teams.
- Member of the tiger team to resolve critical issues requiring emergency rescue.
- Design and develop a shared library to simulate VxWorks API using Linux system calls.
- Co-Design the Software Installation mechanism using RedHat Package Management (RPM).
- Lead team members for implementing newer/alternate debugging features and fix critical system lockups using Linux Trace Toolkit (LTT), Valgrind, mpatrol, gdb, and other tools.
- Define the strategy and the delivery plan for migrating Merlin application from Linux 2.4 to 2.6 as well as migrating from QT3 to QT4.
- Identify and implement numbers of process enhancement for better review and output.
- As a Technical lead design and deliver an iOS based Medical mobile application for iPad.
- Develop a complex and secure application to view patient data over internet.