

Exhibit B

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

**IN RE: Seroquel Products Liability Litigation,
MDL DOCKET NO. 1769 (ALL CASES)**

AFFIDAVIT OF HOWARD REISSNER

1. I am Howard Reissner and I am the Chief Executive Officer (CEO) of Planet Data Solutions, Inc. (“Planet Data”). Planet Data is a national discovery solutions provider that processes and hosts millions of electronic records, and scans, codes, and produces millions of documents every month. In my position as Chief Executive Officer of Planet Data Solutions, Inc., I am responsible for managing and overseeing the operational and financial performance of the Company. I have extensive experience in electronic document management and production in the litigation context. I have worked in the electronic discovery industry for nine years. Planet Data already has assisted AstraZeneca in the collection, formatting, and production of the SEROQUEL® IND and NDA, which consisted of over 480,000 pages of documents. Planet Data currently is assisting AstraZeneca and its counsel in the collection and review of additional documents of an exponentially greater number.

2. Through a contract with AstraZeneca, Planet Data has been tasked with processing for production hard copy and electronic documents collected by AstraZeneca that potentially contain discoverable information relating to this litigation.

3. Hard Copy Documents

a. For hard copy or paper documents, Planet Data converts each document into a TIFF image—essentially a picture of the document. This process allows paper documents to be stored and transmitted electronically. It further allows the document to

be electronically Bates labeled, confidentiality stamped, and redacted. Pursuant to Planet Data's contract with AstraZeneca, AstraZeneca is charged 9.5¢ per page to TIFF copies of AstraZeneca paper documents, and 13.5¢ per page to TIFF original AstraZeneca paper documents.

b. In addition to converting paper documents to TIFF images, Planet Data also performs an OCR—or “optical character recognition”—scan of each hard copy document, creating a searchable “text” file for each imaged document. Planet Data charges AstraZeneca 3¢ per page for this service.

c. After hard copy documents are converted and OCR scanned, they are delivered to Zantaz, Inc. (“Zantaz”), a separate discovery solutions provider. Zantaz, also through a contract with AstraZeneca, services the software used by counsel for AstraZeneca to review AstraZeneca's documents, and it is the company responsible for the actual production of AstraZeneca's documents in this litigation.

4. Electronic Documents

a. Separate from paper documents, AstraZeneca also has collected for purposes of this litigation electronic or “native” documents. “Native” format is the format in which a document was originally created, along with any associated file structure. These documents come from a variety of internal AstraZeneca sources: e.g., e-mail servers, hard drives, and shared drives. For every native or electronic document, Planet Data, using its own proprietary software, extracts into separate files the document's text and all of its metadata. Again by contract, Planet Data charges AstraZeneca \$375 per gigabyte of data extracted from native file format documents.

b. Once the extraction process is complete, Planet Data delivers to Zantaz each electronic document's native file, metadata file, and extracted text file. Planet Data charges AstraZeneca 8¢ per file for all Native File Deliveries.

c. Before documents can be produced, however, Planet Data further must provide Zantaz with a TIFF version of each document, which, as discussed above, allows the document to be electronically Bates labeled, confidentiality stamped, and redacted. Planet Data charges AstraZeneca 2.5¢ per page to perform this conversion and deliver to Zantaz .

d. Moreover, for electronic documents that require redaction, the extracted text document cannot be produced (as the redacted information will remain in that text file). Instead, the redacted document must be OCR scanned in order to produce a searchable text file, but that ensures that the protected information is removed. Although Zantaz, and not Planet Data, performs this task, I am aware that by contract with AstraZeneca, Zantaz charges 3¢ per page for this service.

e. Finally, electronic documents, when produced in TIFF format, with accompanying load and metadata files, can be searched and sorted, and are compatible with most commercially available database software.

5. At present, AstraZeneca has collected more than one million documents—approximately 80% of which are electronic documents—comprising more than 10 million pages, and continues to collect and forward additional documents for processing and review.

6. Based on my nine years of experience in this field, the costs charged to AstraZeneca for the processes above are standard and customary within the industry.

I declare, under penalty of perjury under the laws of the State of New York that the foregoing is true and correct. Executed this 15th day of January, 2007, at Planet Data Solutions in Elmsford, NY.


