# EXHIBIT "H"

# **EXHIBIT D**

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

IN RE: Seroquel Products Liability Litigation

MDL DOCKET NO. 1769

This Document Relates to ALL CASES

#### CERTIFICATION OF COMPLETE CUSTODIAL PRODUCTION

Defendants AstraZeneca Pharmaceuticals LP and AstraZeneca LP ("AstraZeneca"), by and through their attorneys, hereby certify that reasonable steps and processes have been taken to collect, process and produce, subject to technical limitations, all relevant, non-privileged documents found in the Custodial Files of the eight custodians listed below.

Each custodian is an individual employee or former employee of AstraZeneca. The Custodial File for each custodian consists of documents maintained by that custodian through July 6, 2006, and includes paper documents maintained in the custodian's hard copy files, electronic documents maintained on the custodian's work (desktop and/or laptop) computer and personal drive on AstraZeneca's network, and emails, including those existing in ".pst" format, maintained in the custodian's AstraZeneca email account ("Custodial Documents"). The Seroquel® Keyword Search For Filtering Of Electronic Documents (Exhibit A hereto) was applied to each custodian's electronic Custodial Documents to determine the potential relevance of all such Custodial Documents.

As used herein, the term "documents" has the broadest possible meaning and interpretation ascribed to it, including, but not limited to: writings, drawings, graphs, charts, photographs, phone records, and other data compilations from which information can be obtained and converted, if necessary, by the respondent into reasonably usable form.

Custodians for whom production is complete:

Lisa Boornazian
Jack Boorstein
Katheryn Bradley
Kim Busch
Vikram Dev
Kevin Hamill
Karin Mueller
Mike Murray

Dated: April 30, 2007

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Counsel for AstraZeneca Pharmaceuticals LP and AstraZeneca LP

#### CERTIFICATE OF SERVICE

I hereby certify that, on the 30th day of April, 2007, I caused to be served a true and correct copy of the foregoing via electronic mail and/or United States first-class mail upon the individuals listed below.

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Lead Counsel for Plaintiffs

/s/ A. Richard Winchester

**EXHIBIT A** 

### SEROQUEL® KEYWORD SEARCH LIST FOR FILTERING OF ELECTRONIC DOCUMENTS

Seroquel quetiapine fumarate ZD5077

Abilify
anipiprazole
Clozaril
clozapine
Compazine
prochlorperazine
Geodon
ziprasidone
Haldol
haloperidol
Mellaril
thioridazine
Orap
pimozide

Prolixin
fluplicnazine
Risperidal
risperidone
Serzone
nefazodone
Stelazine
trifluoperazine
Thorazine
chlorpromazine

Trilafon
perphenazine
Zyprexa
olanzapine

Antipsychotics Neuroleptics

Diabetes
Insulin
NIDDM
Mellitus
Gestational Diabetes
MODY
Hyperglycemia

0

Blood Sugar Glucose Dysregulation Hemoglobin HbA1c HAIc Alc

Weight Gain Hypercholesterolemia Hypertriglyceridemia **Pancreatitis** Tachycardia Extrapyramidal Symptoms Rigidity Rigidity Tremors Dystonia muscle contractions Akathasia restlessness Parkinsonism QT Prolongation Tardive Dyskinesia TD

Agramulocytosis Neuroleptic Malignant Syndrome metabolism metabolic disorder neuropinephrine

Schizophrenia Bipolar Mania Dopamine Seratonin

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