

EXHIBIT “I”

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

IN RE: Seroquel Products Liability
Litigation

Case No. 6:06-md-1769-Orl-22DAB

**PLAINTIFFS' JOINT STATEMENT OF RESOLVED ISSUES AND
NOTICE THAT A HEARING IS NOT REQUIRED**

As per this Court's Order, the parties have had several in-person meetings as well as numerous telephone conferences in order to resolve several outstanding IT issues. Plaintiffs are now satisfied that these issues have been resolved, as set forth below:

Corrected Load File

1. Defendants have agreed that corrected load files, along with their counterpart .LFP and .DAT files for all previous productions will be re-sent to the Plaintiffs. Defendants have estimated that these corrections will take four weeks to produce.
2. Corrections of prior load files will include all changes agreed to by the Defendants as it pertains to the consistency of the MetaData and Bates numbering system as set forth below.

Consistency of MetaData

1. Defendants have agreed to produce corrected load files for all previous productions, and Defendants will make both the field headings and Bates numbers consistent and with NO extraneous dashes, spaces or characters.
2. Defendants have agreed that all future labeling of Bates numbers will have NO extraneous

- dashes, spaces or characters, and all Bates numbers should be in the form: AZSER0484646.
3. Defendants have agreed that the names of all SOURCE in the MetaData field should be separated consistently.
 4. Defendants have agreed to consistently label the field names.
 - a. If Defendants chose to use the label “Begin Bates”, and “End Bates”, they will consistently use these terms to the exclusion of all other labels such as “Beginning Bates.”
 5. Defendants have estimated that these corrections will take four weeks to produce.

Swapped MetaData Fields

1. Defendants have agreed to check each .DAT file for all previous custodial productions IP1 through IP14, for swapped MetaData fields and information and to make any corrections. Defendants have agreed to tell plaintiffs which load files contained swapped fields. Defendants estimate that this will take seven days to complete.
2. Defendants have agreed to check all future productions and to make all corrections.

Page Breaks

1. Defendants have agreed to provide all page breaks for all productions for documents that are 10 or more pages in length from all previous productions IP1 through IP14 in the extracted text files for non-redacted documents.
2. Defendants agreed to put page breaks in all future productions for documents that are 10 or more pages in length, i.e. for all productions after IP14.

3. Plaintiffs have agreed to accept the inherent error rate for this process. However, the parties have agreed to continue to meet and confer on this issue, as Defendants have not yet implemented this process and are not sure what the error rate might be.
4. Defendants do not guarantee this proposal's success.
5. Plaintiffs have agreed to accept a rolling production with the corrected, extracted text files containing page breaks and agree that the format need not duplicate the initial production.
6. Defendants have stated that page breaks are not an issue for redacted files, as the OCR process underlying the redaction process puts page breaks in the documents.
7. Defendants estimate that it will take one week to put the program designed to fix the page break problem in place. Defendants represented that this process has already started. Thereafter, Defendants best estimate, with maximum utilization of Defendants' vendor's hardware capacity, is six weeks to correct the prior productions. This is based upon an estimate of approximately 1 million corrected pages per week. Defendants have agreed to notify Plaintiffs if any problems develop with regard to this schedule.

Excel Spreadsheets

1. Defendants have agreed to provide Plaintiffs with copies of all incomplete Excel documents as previously noted and addressed in an e-mail to Rodney Miller. Defendants are still investigating the cause of this problem and will notify Plaintiffs whether they have conclusively determined whether additional Excel spreadsheets were affected.
2. It was agreed that Defendants will produce all Excel spreadsheets in MS Excel with scrubbed MetaData in read-only format. Defendants will provide a timetable as to when they can

complete this production.

3. The parties have agreed to meet and confer on a process to authenticate the Excel Spreadsheets, as they will not have Bates numbers.

Objective Coding

1. Defendants were unsure if objective coding on native hardcopy documents was done, and will advise Plaintiffs if such coding exists.

Privilege Logs

1. Defendants agreed to provide Plaintiffs with privilege logs that will include a SOURCE and a Bates Number that corresponds to the documents already produced by the Defendants.
2. Due to the delays in the production of documents, Defendants have agreed to use best efforts to provide Plaintiffs with the production of other privilege logs. Defendants have not promised to produce privilege logs faster than what is required under CMO2.
3. Plaintiffs raised the issue of how documents are redacted or identified for privilege. Plaintiffs understand these documents are pulled and identified separate from the custodial file. Plaintiffs saw this as a problem, as the documents once removed from the file do not give the reviewer any context in how they were kept and it impedes the flow of the review. Defendants' position was that their method of Bates stamping the documents and reviewing of same did not allow for the documents to remain within the custodial file production as a whole. However, Defendants have stated that the Source code is provided and from that Plaintiffs will know exactly where and from what Custodial file the document was pulled

from. Based upon these assurances, Plaintiffs believe that this issue has been resolved.

Redaction Logs

1. Defendants have agreed to provide consistent labeling of redaction information.
2. As with privilege logs, Defendants agreed to provide redaction logs that will include a SOURCE and the Bates number that corresponds to the related documents.
3. Defendants have agreed to work with Plaintiffs in the coding of future document redactions on a page level instead of a document level as is done presently.

Blank Documents

1. Plaintiffs have provided several examples of documents that are blank with corresponding MetaData that suggests the document should not be blank. Defendants are working with their vendor, but do not have an answer as to why this has happened. They have promised to advise Plaintiffs as soon as they have an answer.
2. Defendants have explained to Plaintiffs that these documents with listings that state, "Document is Blank", in the image are due to personal customization of e-mails with various designed document borders.
 - a. Defendants have agreed to provide the Plaintiffs with a list of "File Names" that correlate to the "Document is Blank" images.

IP10 Production

1. Defendants have explained to Plaintiffs that in production IP10, the folder "remaining non-

produced 04290" was a correction of a vendor error.

CANDA

1. Defendants have explained to Plaintiffs that documents contained within the CANDA database are currently in the production process. Defendants expect that these documents will be ready by June 8, 2007 and forwarded so that Plaintiffs will receive them by June 11, 2007.

Foreign Language Documents

1. Defendants produced foreign language documents for the 80 custodians identified to date.
2. Defendants provided a breakdown of the different foreign languages used within these documents and the number of documents where each language appears in the documents.
3. The parties will discuss the costs of translation for said documents.

30(b)(6) Deposition Documents

1. Defendants have agreed to Bates number and provide all documents disclosed for the 30(b)(6) deposition in an electronic format.

Certification of Custodial Files

1. Defendants have assured Plaintiffs that deleted e-mails or other documents from their system have been searched, as well as any documents that the custodian had access to, or worked with, that are related to Seroquel, but may not be in the SOLE custody of a particular

custodian. These documents are not found in a database, but rather a common hard drive where everyone on a particular team can access, create and/or store documents.

2. Defendants have assured Plaintiffs that their searches included the issues raised above and their Certification of Completeness will include those issues.

Databases

1. The Parties will continue to meet and confer on database production so that a procedure can be worked out for their production.

Production Key

1. Plaintiffs have provided Defendants with a key to the production numbering system used by the Plaintiffs with regards to the labels on the drives provided by the Defendants.

As a result of the resolution of the above issues, the parties agree that no hearing is required on June 13, 2007.

Dated: June 7, 2007

Respectfully Submitted

By: _____ /s/

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of June, 2007, I electronically filed the foregoing **PLAINTIFFS' JOINT STATEMENT OF RESOLVED ISSUES AND NOTICE THAT A HEARING IS NOT REQUIRED** with the Clerk of the Court by using the CM/ECF system, which will send a Notice of Electronic Filing to the counsel listed on the attached Service List. I further certify that I mailed the foregoing document and the Notice of Electronic Filing by First-Class U.S. Mail delivery to the non-CM/ECF Participants listed on the attached Service List.

/s/ Michael E. Pederson
Michael E. Pederson

SERVICE LIST
(As of May 15, 2007)

In Re: Seroquel Products Liability Litigation
MDL Docket No. 1769 - Orl - 22DAB

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