

**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

**JOINT MOTION AND COMBINED MEMORANDUM
TO APPOINT A PROJECT MANAGEMENT OFFICE**

The MDL Plaintiffs and Defendants AstraZeneca LP and AstraZeneca Pharmaceuticals LP (“AstraZeneca”), by and through their counsel, respectfully submit this Joint Motion and Combined Memorandum to Appoint a Project Management Office to coordinate case specific discovery in this MDL.

1. The parties have met and conferred and hereby jointly move that this Court appoint the firm of BrownGreer PLC (“BrownGreer”) to serve as the Project Management Office (“PMO”) to coordinate case specific discovery in this MDL.

2. BrownGreer has ample experience with litigation management and support, claims resolution and administration, and discovery programs in mass tort litigations, most notably Dalkon Shield and Fen-Phen Diet Drugs. Background information about the firm, along with resumes and contact information for the firm’s partners, is attached hereto as Exhibit A. Additional information can be found on the firm’s website:

<http://www.browngreer.com/>.

3. The parties have spoken with Orran Brown, partner at BrownGreer, who indicated that the firm is willing and able to assist in coordinating case specific discovery in this MDL.

4. BrownGreer has provided the parties with the firm's billing rates, included in Exhibit A, but the parties have not yet agreed upon a specific fee arrangement with BrownGreer or how costs will be divided among the parties. Mr. Brown has assured the parties that BrownGreer will be able to accommodate a fee schedule that is agreeable to them and this Court. The parties will continue to meet and confer about these issues.

5. The parties will also continue to meet and confer with each other and with BrownGreer regarding who at the firm should be appointed Special Master. The parties are considering the availability of the partners at the firm, the precise scope of the work to be performed, and the fees associated with such work, among other things.

6. The parties propose that the scope of duties and authority for BrownGreer, as PMO for this MDL, shall be as follows:

BrownGreer shall serve as the Project Management Office for the administration of the case specific discovery program in this MDL. As PMO, BrownGreer shall determine the availability of physicians and sales representatives for depositions; coordinate with liaison counsel for the parties, witnesses, and counsel for the witnesses to schedule such depositions; facilitate the steps needed to adhere to the deposition and other discovery deadlines set by the Court; maintain a deposition calendar; facilitate the resolution among the parties and deponents of scheduling conflicts and

changes to the deposition schedule; and provide regularly scheduled reports and other reports as requested on the progress of such discovery.

7. BrownGreer is also capable, if needed or requested by the parties and/or the Court, of providing centralized storage of electronic images and hardcopy files of deposition transcripts and exhibits and of other discovery materials; providing uniform access for the parties and the Court to such materials through a secure website; creating and hosting a centralized litigation website; coding and tracking standardized pleadings and discovery responses, including assessments of the completeness of responses to standardized fact sheets or other uniform disclosures mandated by the Court or rules; creating and maintaining a centralized docket, case list and status report; generating reports on any such discovery or case-specific issues; and meeting other technological and managerial needs of the parties and the Court. The parties will continue to meet and confer about whether such services will be necessary or beneficial to this litigation in the future.

CONCLUSION

Accordingly, the parties respectfully request that this Court appoint Brown Greer PLC as PMO for this MDL.

Respectfully submitted on this the 12th day of July, 2007,

/s/ Paul Pennock

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CERTIFICATE OF SERVICE

I hereby certify that, on the 12th of July, 2007, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to the non-CM/ECF participants listed on the attached Service List.

/s/ Shane T. Prince

SERVICE LIST

**In Re: Seroquel Products Liability Litigation
MDL Docket No. 1769**

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