

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
Orlando Division**

In Re: Seroquel Products Liability Litigation

Case No. 6:06-md-01769-ACC-DAB

MDL Docket No. 1769

DOCUMENT RELATES TO ALL CASES

**EXHIBIT LIST**

\_\_\_ Government     Plaintiff    \_\_\_ Defendant    \_\_\_ Court

<b>Exhibit No.</b>	<b>Date Identified</b>	<b>Date Admitted</b>	<b>Witness</b>	<b>Objection</b>	<b>Description of Exhibit</b>
1					Declaration of John Martin in Support of Plaintiffs' Motion for Order Imposing Discovery Sanctions
1.01					Exhibit 1 to Martin Declaration : Martin CV
1.02					Exhibit 2 to Martin Declaration: Article "The New Phone Concept Supports the Business Process" by Marc Schneider
1.03					Exhibit 3 to Martin Declaration: e-mail of 9/4/03 re question concerning medwatch
1.04					Exhibit 4 to Martin Declaration: Seroquel Internal PR Milestones 2003-2004

1.05					Exhibit 5 to Martin Declaration: e-mail of 10/209/03 re preparation for Seroquel labeling negotiations
1.06					Exhibit 6 to Martin Declaration: Certification of Complete Custodial Production
1.07					Exhibit 7 to Martin Declaration: e-mail re MEDHIST & CONMED
1.08					Exhibit 8 to Martin Declaration: Plaintiff AZ Search Terms List 7/19/07
1.09					Exhibit 9 to Martin Declaration: article from ibis Consulting, Inc.
1.10					Exhibit 10 to Martin Declaration: document tracking printout re AZSER0929181
1.11					Exhibit 11 to Martin Declaration: re AZSER08094539
1.12					Exhibit 12 to Martin Declaration: Metadata from the email AZSER08028911
2					Partial transcript from 9/7/06 hearing
3					Partial transcript from 11/6/06 hearing
4					Partial transcript from 11/20/06 hearing
5					Partial transcript from 12/11/06 hearing

6					Partial transcript from 12/12/06 hearing
7					Partial transcript from 3/2/07 hearing
8					Partial transcript from 4/12/07 hearing
9					Partial transcript from 5/22/07 hearing
10					Partial transcript from 6/13/07 hearing
11					Court Order of 1/26/07
12					Plaintiffs' Joint Statement of Resolved Issues and Notice That a Hearing Is Not Required
13					Plaintiffs' Motion For an Order 1. compelling Defendants to Provide Complete Certified Production of the First Eight Custodial Files and All Other Custodial Files Produced to Date; 2. Suspending the Custodial Production Method Upon Completion of the Production of the Outstanding Custodial Files Produced to Date; and 3. Immediately Permitting Plaintiffs to Proceed by a Notice to Produce Method of Discovery
14					Defendant AstraZeneca's Opposition to Plaintiffs' Motion to Compel Discovery
15					9/11/06 Order and Notice of Hearing

16					Declaration of Jonathan Jaffe in Support of Plaintiffs' Motion For Order Imposing Discovery Sanctions
16.01					Exhibit 1 to Jaffe Declaration: 11/17/06 e-mail re Production Requirements
16.02					Exhibit 2 to Jaffe Declaration: first 8 custodians
16.03					Exhibit 3 to Jaffe Declaration: 1/11/07 e-mail re Seroquel MDL document production
16.04					Exhibit 4 to Jaffe Declaration: 1/29/07 email re Seroquel MDL sample MDL production
16.05					Exhibit 5 to Jaffe Declaration: 2/2/07 e-mail re document production
16.06					Exhibit 6 to Jaffe Declaration: 3/14/07 e-mail re additional issues with custodial production format
16.07					Exhibit 7 to Jaffe Declaration: 6/5/07 e-mail re meet and confer
16.08					Exhibit 8 to Jaffe Declaration: 6/5/07 e-mail re IT issues and their status
16.09					Exhibit 9 to Jaffe Declaration: 6/5/07 e-mail re today's meet and confer
16.10					Exhibit 10 to Jaffe Declaration: 6/25/07 email re Update on Technical Issues

16.11					Exhibit 11 to Jaffe Declaration: 6/27/07 email re: continuing IT production failures
16.12					Exhibit 12 to Jaffe Declaration: 6/29/07 re technical fix issues
16.13					Exhibit 13 to Jaffe Declaration: 7/11/07 email from Pennock
16.14					Exhibit 14 to Jaffe Declaration: 7/13/07 e-mail from Yeager
16.15					Exhibit 15 to Jaffe Declaration: 7/20/07 e-mail from Yeager
16.16					Exhibit 16 to Jaffe Declaration: Confidential Doc. And attached metadata
16.17					Exhibit 17 to Jaffe Declaration: Query used for extraction
16.18					Exhibit 18 to Jaffe Declaration: e-mail 1/19/07 from Eben Flaster
16.19					Exhibit 19 to Jaffe Declaration: 6/11/06 e-mail from Freebery
16.20					Exhibit 20 to Jaffe Declaration: 6/13/07 from Dupre
16.21					Exhibit 21 to Jaffe Declaration: 6/14/07 from Dupre
16.22					Exhibit 22 to Jaffe Declaration: 6/19/07 from Dupre
16.23					Exhibit 23 to Jaffe Declaration: 6/20/07 from Dupre
16.24					Exhibit 24 to Jaffe Declaration: 6/27/07

					from Pennock
16.25					Exhibit 25 to Jaffe Declaration: 7.2.07 from Dupre
17					Certification of Michael E. Pederson
17.1					Exhibit 1 to Pederson Certification: series of E-mails received by me on February 21, 2007, in which I was cc'd, that addressed defendants document production and concerns plaintiffs were having with the pace and technical content of the productions.
17.2					Exhibit 2 to Pederson Certification: E-mail from Shane Prince, which included an attached draft of defendants proposed CMO 4 with Appendix A. attached thereto. Appendix A is now Exhibit 2 attached hereto.
17.3					Exhibit 3 to Pederson Certification: E-mail I received on April 10, 2007, which advised plaintiffs that defendants were still working on problems plaintiffs were having with reviewing the Excel spreadsheets and the TIFF images, which did not fully recreate the native formatting of the

					documents.
17.4					Exhibit 4 to Pederson Certification: letter dated April 13, 2007, which I sent via regular mail to James J. Freebery, regarding ongoing document production problems plaintiffs were having.
17.5					Exhibit 5 to Pederson Certification: E-mail dated April 19, 2007, which confirms that James J. Freebery received my letter of April 13, 2007, which had subsequently been E-mailed to him on April 18, 2006, by my legal assistant Yommy Chiu.
17.6					Exhibit 6 to Pederson Certification: E-mail dated April 19, 2007, which I received from Roddy K. Miller in response to an E-mail I had earlier sent him concerning problems plaintiffs were having with the images plaintiffs were seeing in the productions.
17.7					Exhibit 7 to Pederson Certification: letter dated April 30, 2007, with attachments, which I received from James J. Freebery, that purported to address concerns raised in my prior letter dated April 13, 2007,

					which was E-mailed to defendants on April 18, 2007.
17.8					Exhibit 8 to Pederson Certification: E-mail and attached letter dated May 21, 2007, which I sent to James J. Freebery, which further outlined and clarified continuing technical issues plaintiffs were having with defendants productions
17.9					Exhibit 9 to Pederson Certification: E-mail I received from James J. Freebery on May 21, 2007, which confirmed he had received my Exhibit 8 letter.
17.10					Exhibit 10 to Pederson Certification: last E-mail in a string of E-mails, between James J. Freebery and I, which addressed the technical issues plaintiffs intended to discuss during the parties Meet and Confer scheduled for May 30, 2007
17.11					Exhibit 11 to Pederson Certification: Andrew Dupre E-mail with attached letter from James J. Freebery, which I received on May 31, 2007, that listed defendants understanding of the status of the technical issues raised by plaintiffs during the parties Meet



					and Confer of May 30, 2007.
17.12					Exhibit 12 to Pederson Certification: E-mail letter prepared by me and sent by my legal assistant Yommy Chiu to James J. Freebery on May 31, 2007, which is a summary of plaintiffs understanding of the status of the technical issues discussed during the parties meet and Confer on May 30, 2007.
18					Excerpt from 5/14/07 deposition of Ann V. Booth-Barbarin
19					Excerpts from 6/20/07 deposition of Alfred Paulson
20					Declaration of Beth E. Sund in Support of Plaintiffs' Motion For Order Imposing Discovery Sanctions