

US District Court
Middle District of Florida

PLAINTIFFS' EXHIBIT

Exhibit Number: 16.15

6:06-md-01769-ACC-DAB

**In Re: Seroquel Products Liability
Litigation**

Date Identified:

Date Admitted:

Exhibit 16.15

Jaffe, Jonathan

From: Yeager, Joe [JYeager@McCarter.com]
Sent: Friday, July 20, 2007 9:57 AM
To: Jaffe, Jonathan
Cc: Winchester, Tony; Freebery, James J.; Dupre, Andrew
Subject: RE: Replacement files

Jonathan,

As I understand, the documents identified by you constitute blank pages which we still intend to deliver. Specifically, these documents were failures of the TIFFing module to fire properly, usually by excluding the blank page removal tool. The substantive blank and mismatched pages were discovered by our investigation (and our vendor's more specifically) as a result of Scott Allen's example and are completed in this redelivery.

Sincerely,

Joe

-----Original Message-----

From: Jaffe, Jonathan [mailto:jjaffe@weitzlux.com]
Sent: Thursday, July 19, 2007 5:48 PM
To: Yeager, Joe
Cc: Winchester, Tony; Freebery, James J.; Dupre, Andrew; Larry J. Gornick; Pederson, Mike; Dennis Canty; Kramer, Glenn
Subject: RE: Replacement files

Joe,

Just to clarify, do you mean that this just represents the blank pages on documents that we identified to you, not the ones that your vendor was able to determine? As I understand you below, the scope of other documents that may or may not be affected by the same problem has not been quantified yet. Did this include all of the examples I sent to you, Jim, and Andrew on June 5th from Chuck Hunger as well including those "Seroquel Flash Reports" blanks?

Thank you,
Jonathan Jaffe

From: Yeager, Joe [mailto:JYeager@McCarter.com]
Sent: Thursday, July 19, 2007 4:48 PM
To: Jaffe, Jonathan
Cc: Winchester, Tony; Freebery, James J.; Dupre, Andrew
Subject: RE: Replacement files

Jonathan,

I apologize for my late response to your earlier e-mail. The day controlled me as opposed to my controlling it. I have requested our vendor to make your requested corrections to the replacement file production. As for extracted text with page breaks for this production in particular, frankly you will receive extracted text with page breaks for ALL files (including these) faster than it would take us to include them on this production media.

In response to your question pertaining to any additional blank page deliveries, this production represents the reproduction for all mismatched pages as identified by Scott Allen at the 6/6 meet/confer. I understand that this subject was more fully discussed in some email exchanges between Andrew Dupre and Paul Pennock on 6/29.

There will be a separate reproduction for blank pages but, that reproduction is only cosmetic - it just removes blanks that should be blanks from the documents; it does not add or reorganize any information. We do not yet have a quantity on that.

As always, feel free to contact me with any additional questions.

Sincerely, Joe

-----Original Message-----

From: Jaffe, Jonathan [mailto:jjaffe@weitzlux.com]

Sent: Thursday, July 19, 2007 10:14 AM

To: Yeager, Joe

Cc: Pederson, Mike; Larry J. Gornick; Dennis Canty; Kramer, Glenn; Fernandez, Lenny

Subject: RE: Replacement files

Joe,

I would prefer that we receive the corrected lfp and dat and text files that corresponds to the folders you gave to us. We do not need the images re-provided as with the corrected lfp and dat files, we will pass over them. We do need corrected text files with page breaks so that we do not have to re-import multiple times and we need the agreed upon file names.

If a new drive can get here today, then that route might be easiest.

Also, I am still unclear as to whether we will be receiving additional fixes regarding the blank page issue for additional custodians as your earlier email left open that possibility.

Thank you,
Jonathan Jaffe

From: Yeager, Joe [mailto:JYeager@McCarter.com]

Sent: Thursday, July 19, 2007 10:01 AM

To: Jaffe, Jonathan

Subject: Replacement files

Jonathan, as a follow-up from yesterday's concerns, would you prefer that I re-send a new drive containing only the replacement files and corrected lfp convention, or provide you with a list of the files that are in fact replacements? I would prefer the former, but thought seeking your input made sense. Sincerely, Joe

This email message from the law firm of McCarter & English, LLP is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email (or helpdesk@mccarter.com) and destroy all copies of the original message.

This email message from the law firm of McCarter & English, LLP is for the sole use of the intended recipient(s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email (or helpdesk@mccarter.com) and destroy all copies of the original message.