

US District Court
Middle District of Florida

PLAINTIFFS' EXHIBIT

Exhibit Number: 16.18

6:06-md-01769-ACC-DAB

**In Re: Seroquel Products Liability
Litigation**

Date Identified:

Date Admitted:

Exhibit 16.18

Dennis Canty

From: Flaster, Eben [eben.flaster@dechert.com]
Sent: Friday, January 19, 2007 9:32 AM
To: tkelber@Sidley.com; jjaffe@weitzlux.com; McConnell, Stephen; Magaziner, Fred
Cc: kaltman@lawampmmt.com; Torregrossa, Brennan; Larry J. Gornick; Dennis Canty; MPederson@weitzlux.com; lroth@roth-law.com; ftrammell@bpblaw.com; kbailey@bpblaw.com; CBailey@bpblaw.com; KSmith@aws-law.com; kj@kjensenlaw.com; NHuey@Sidley.com
Subject: Re: AZ IT interviews

All --

During the course of our (continuing) investigation, we have identified the following additional databases for potential discussion at the upcoming interviews:

Daryl Draper:

Clinical Trials - CRF/DEN; DIRM; COOL

John Dowling:

Sales Tracking - Touchstone

Visitor Speakers Bureau/Thought Leaders - PREP

See you on Monday.

Thanks,
Eben

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

From: Kelber, Tamar B. <tkelber@Sidley.com>
To: jjaffe@weitzlux.com <jjaffe@weitzlux.com>; Flaster, Eben; McConnell, Stephen; Magaziner, Fred
Cc: kaltman@lawampmmt.com <kaltman@lawampmmt.com>; Torregrossa, Brennan; lgornick@lskg-law.com <lgornick@lskg-law.com>; dcanty@lskg-law.com <dcanty@lskg-law.com>; MPederson@weitzlux.com <MPederson@weitzlux.com>; lroth@roth-law.com <lroth@roth-law.com>; ftrammell@bpblaw.com <ftrammell@bpblaw.com>; kbailey@bpblaw.com <kbailey@bpblaw.com>; CBailey@bpblaw.com <CBailey@bpblaw.com>; KSmith@aws-law.com <KSmith@aws-law.com>; kj@kjensenlaw.com <kj@kjensenlaw.com>
Sent: Thu Jan 18 12:57:48 2007
Subject: Re: AZ IT interviews

We will meet you in the lobby.

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

From: Jaffe, Jonathan <jjaffe@weitzlux.com>
To: Flaster, Eben <eben.flaster@dechert.com>; McConnell, Stephen <stephen.mcconnell@dechert.com>; Magaziner, Fred <fred.magaziner@dechert.com>; Kelber, Tamar B. <tkelber@Sidley.com>
CC: kaltman@lawampmmt.com <kaltman@lawampmmt.com>; Torregrossa, Brennan <brennan.torregrossa@dechert.com>; lgornick@lskg-law.com <lgornick@lskg-law.com>; dcanty@lskg-law.com <dcanty@lskg-law.com>; Pederson, Mike

<MPederson@weitzlux.com>; lroth@roth-law.com <lroth@roth-law.com>;
ftrammell@bpblaw.com <ftrammell@bpblaw.com>; kbailey@bpblaw.com
<kbailey@bpblaw.com>; CBailey@bpblaw.com <CBailey@bpblaw.com>; Ken Smith
<KSmith@aws-law.com>; Keith Jensen <kj@kjensenlaw.com>
Sent: Thu Jan 18 11:48:11 2007
Subject: RE: AZ IT interviews

For whom should we ask when we arrive Monday? Is there a specific place to go to sign in? Thanks.

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

From: Flaster, Eben [mailto:eben.flaster@dechert.com]
Sent: Monday, January 15, 2007 11:42 AM
To: Flaster, Eben; Keith Jensen; McConnell, Stephen; Jaffe, Jonathan; Magaziner, Fred; tkelber@Sidley.com
Cc: kaltman@lawampmmt.com; Torregrossa, Brennan; lgornick@lskg-law.com; dcanty@lskg-law.com; Pederson, Mike; lroth@roth-law.com; ftrammell@bpblaw.com; kbailey@bpblaw.com; CBailey@bpblaw.com
Subject: RE: AZ IT interviews

Seemed to have forgotten a city: The complete address is 1800 Concord Pike, Wilmington, DE. That should get you there. Thanks.

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

From: Flaster, Eben
Sent: Monday, January 15, 2007 11:38 AM
To: 'Keith Jensen'; McConnell, Stephen; jjaffe@weitzlux.com; Magaziner, Fred; tkelber@Sidley.com
Cc: kaltman@lawampmmt.com; Torregrossa, Brennan; lgornick@lskg-law.com; dcanty@lskg-law.com; MPederson@weitzlux.com; lroth@roth-law.com; ftrammell@bpblaw.com; kbailey@bpblaw.com; CBailey@bpblaw.com
Subject: RE: AZ IT interviews

AZ's address is 1800 Concord Pike, DE. Yes, let's start at 9 am.
Thanks.

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

From: Keith Jensen [mailto:kj@kjensenlaw.com]
Sent: Monday, January 15, 2007 11:14 AM
To: Flaster, Eben; McConnell, Stephen; jjaffe@weitzlux.com; Magaziner, Fred; tkelber@Sidley.com
Cc: kaltman@lawampmmt.com; Torregrossa, Brennan; lgornick@lskg-law.com; dcanty@lskg-law.com; MPederson@weitzlux.com; lroth@roth-law.com; ftrammell@bpblaw.com; kbailey@bpblaw.com; CBailey@bpblaw.com
Subject: RE: AZ IT interviews

Got address for 22nd (presumably 9am)? Thx

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

From: Flaster, Eben [mailto:eben.flaster@dechert.com]
Sent: Monday, 15 January, 2007 10:08
To: McConnell, Stephen; jjaffe@weitzlux.com; Magaziner, Fred; tkelber@Sidley.com

Cc: kaltman@lawampmmt.com; Torregrossa, Brennan; lgornick@lskg-law.com;
dcanty@lskg-law.com; MPederson@weitzlux.com; lroth@roth-law.com;
ftrammell@bpblaw.com; kbailey@bpblaw.com; Keith Jensen; CBailey@bpblaw.com
Subject: RE: AZ IT interviews

Jonathan --

In response to your request, we specifically identify below (by IT witness with knowledge) AZ's systems and attempt to align them with the 14 categories requested:

Daryl Draper:

Adverse Event Reporting - CLINTRACE; SAM; GESISS

Clinical Communications - SAMSON

Clinical Trials/Research Report - IIRIS; AMOS/Diplomat; IMPACT

Regulatory - GEL

Medical Literature - PLANET

John Dowling:

Sales Call Tracking/IMS - Compass/NORTHSTAR

Visitor Speakers Bureau/Thought Leaders - Viewpoint

Instant Message, voicemail, discussion forum, etc. - NICE; MAX; ICON; KNOWBOL

I note that, since our initial disclosure on the subject, we have identified another system, Viewpoint (listed above), potentially responsive to your request.

Thanks,
Eben

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

From: McConnell, Stephen
Sent: Monday, January 15, 2007 9:42 AM
To: 'jjaffe@weitzlux.com'; Flaster, Eben; Magaziner, Fred; 'tkelber@Sidley.com'
Cc: 'kaltman@lawampmmt.com'; Torregrossa, Brennan; 'lgornick@lskg-law.com';
'dcanty@lskg-law.com'; 'MPederson@weitzlux.com'; 'lroth@roth-law.com';
'ftrammell@bpblaw.com'; 'kbailey@bpblaw.com'; 'kj@kjensenlaw.com';
'CBailey@bpblaw.com'
Subject: Re: AZ IT interviews

No surprise here, but it is my understanding that the AZ databases do not perfectly correspond to your list of categories. (I know that you were not claiming that). Frankly, I right now don't have the answer to your question and I was really expecting to get the best answers out of the interviews. That being said, we'll hunt around and try to give you some sort of helpful -- though imprecise -- correspondence between the databases and categories.

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

From: Jaffe, Jonathan <jjaffe@weitzlux.com>

To: Flaster, Eben; McConnell, Stephen; Magaziner, Fred; Tamar Kelber <tkelber@sidley.com>
Cc: Keith Altman <kaltman@lawampmmt.com>; Torregrossa, Brennan; Larry Gornick <lgornick@lskg-law.com>; Dennis Canty <dcanty@lskg-law.com>; Pederson, Mike <MPederson@weitzlux.com>; Larry Roth <lroth@roth-law.com>; Fletch Trammell <ftrammell@bpblaw.com>; Kenneth Bailey <kbailey@bpblaw.com>; Keith Jensen <kj@kjensenlaw.com>; Camp Bailey <cbailey@bpblaw.com>
Sent: Fri Jan 12 16:10:07 2007
Subject: AZ IT interviews

It would be very helpful if you could match up your list of database names (below) with the corresponding categories to which they relate.

CLINTRACE, GESISS, SAM, GEL, SAMSON, IIRIS, AMOS, IMPACT, PLANET, COMPASS, NORTHSTAR, NICE, MAX, ICON and KNOWBOL

- 1) adverse event database
- 2) sales call tracking database
- 3) IMS database
- 4) clinical communications database
- 5) regulatory database
- 6) regulatory contact databases
- 7) clinical trial database
- 8) medical literature database
- 9) research report database
- 10) documentum or similar databases (document management systems used by many pharmacy companies)
- 11) visitor speakers bureau and/or thought leader databases
- 12) clinical payments database
- 13) field force rosters
- 14) instant message, voicemail, discussion forum and prior website page databases, transcripts and recovery.

Best regards,

Jonathan Jaffe
Manager of Software Development
Weitz & Luxenberg, P.C.
212.558.5522
jjaffe@weitzlux.com

From: Kelber, Tamar B. [mailto:tkelber@Sidley.com]
Sent: Friday, January 12, 2007 10:38 AM
To: Camp Bailey
Cc: Eben.Flaster@dechert.com; McConnell, Stephen; Torregrossa, Brennan; Huey, Nathan A.; Miller, Rodney K.
Subject: AZ IT interviews

Here is our current understanding of the databases we will address in the IT interviews on January 22. Our investigation continues, and we will be able to provide you with updated information at the beginning of the interviews.

Darryl Draper: CLINTRACE, GESISS, SAM, GEL, SAMSON, IIRIS, AMOS, IMPACT, PLANET

John Dowling: COMPASS, NORTHSTAR, NICE, MAX, ICON and KNOWBOL

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

From: Flaster, Eben [mailto:eben.flaster@dechert.com]
Sent: Friday, January 12, 2007 3:35 PM
To: Keith Jensen; McConnell, Stephen; Camp Bailey; Magaziner, Fred
Cc: Jaffe, Jonathan; Keith Altman; Torregrossa, Brennan; Tamar Kelber; Larry Gornick; Dennis Canty; Pederson, Mike; Larry Roth; Fletch Trammell; Kenneth Bailey; Kelber, Tamar B.
Subject: RE: Call

AZ sent the list of databases to Camp, and I forwarded it to you earlier this afternoon.

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

From: Keith Jensen [mailto:kj@kjensenlaw.com]
Sent: Friday, January 12, 2007 3:25 PM
To: Flaster, Eben; McConnell, Stephen; Camp Bailey; Magaziner, Fred
Cc: Jonathan Jaffe; Keith Altman; Torregrossa, Brennan; Tamar Kelber; Larry Gornick; Dennis Canty; Mike Pederson; Larry Roth; Fletch Trammell; Kenneth Bailey
Subject: RE: Call

Fred/Eben: Please advise whether or not AZ intends to comply (apparently belatedly) with the first sentence of CMO #2, paragraph II F which reads: "On or before January 5, 2007, AstraZeneca shall provide Lead Counsel for plaintiffs with a list of databases that correspond to the 14 categories identified in plaintiffs' proposed order regarding document production and preservation,1 and which potentially contain information relevant to Seroquel."

Yes or no, please.

Steve and Eben have typed that AZ is apparently willing to comply with the very next sentence (regarding interviews) so we'd like to know.

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

From: Flaster, Eben [mailto:eben.flaster@dechert.com]
Sent: Thursday, 11 January, 2007 16:32
To: Keith Jensen; McConnell, Stephen; Camp Bailey
Cc: Jonathan Jaffe; Keith Altman; Torregrossa, Brennan; Tamar Kelber; Larry Gornick; Dennis Canty; Mike Pederson; Larry Roth; Fletch Trammell
Subject: RE: Call

To what order are you referring? From what I understand, plaintiffs are tomorrow filing objections to the Judge's r-and-r. Be that as it may, there is no need to quibble. AZ wants to move forward with the IT witness interviews to facilitate the larger discovery process. If there is something specific you want, let me know.

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

From: Keith Jensen [mailto:kj@kjensenlaw.com]
Sent: Thursday, January 11, 2007 2:04 PM
To: Flaster, Eben; McConnell, Stephen; Camp Bailey

Cc: Jonathan Jaffe; Keith Altman; Torregrossa, Brennan; Tamar Kelber; Larry Gornick; Dennis Canty; Mike Pederson; Larry Roth; Fletch Trammell
Subject: RE: Call

Eben, thank you. May I presume 9 am the 22nd? Got address/directions pls?

And, pls tell me who AZ gave the CMO #2 para. F list of databases to by 1/5/07 as ordered. I've not seen it. Thx.

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

From: Flaster, Eben [mailto:eben.flaster@dechert.com]
Sent: Thursday, 11 January, 2007 12:28
To: Keith Jensen; McConnell, Stephen; Camp Bailey
Cc: Jonathan Jaffe; Keith Altman; Torregrossa, Brennan; Tamar Kelber; Larry Gornick; Dennis Canty; Mike Pederson; Larry Roth; Fletch Trammell
Subject: RE: Call

I have been in touch with Keith (Altman) on this subject, and, in an effort to move forward with this process, I am willing to reschedule our other obligation (to occur only on the 23rd) such that we can conduct the Seroquel interview on the 22nd.

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

From: kj@kjensenlaw.com [mailto:kj@kjensenlaw.com]
Sent: Thursday, January 11, 2007 1:02 PM
To: McConnell, Stephen; Camp Bailey
Cc: Jonathan Jaffe; Keith Altman; Torregrossa, Brennan; Tamar Kelber; Flaster, Eben; Larry Gornick; Dennis Canty; Mike Pederson; Larry Roth; Fletch Trammell
Subject: Re: Call

Steve, if Eben agrees to reschedule an unrelated matter with Keith A. on the 22nd then we'll all be OK that day. Eben are we all OK that day?

Sent via BlackBerry from Cingular Wireless

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

From: "McConnell, Stephen" <stephen.mcconnell@dechert.com>
Date: Thu, 11 Jan 2007 05:44:58
To: kj@kjensenlaw.com, CBailey@bpblaw.com
Cc: jjaffe@weitzlux.com, kaltman@lawampmmt.com, "Torregrossa, Brennan" <brennan.torregrossa@dechert.com>, tkelber@Sidley.com, "Flaster, Eben" <eben.flaster@dechert.com>
Subject: Re: Call

Keith,

Yes, the other witness is available - indeed, both witnesses are available - on the 22nd. It would be great to wrap up the interviews on the same day. Are none of the plaintiff lawyers available to conduct an interview on that day? Aside from that, as far as I know the other witness is unavailable until after the 25th. If you let us know your schedule (assuming no plaintiff lawyer but you can do an interview), we can almost certainly line something up very shortly thereafter.

I am aware of the Judge's order and seriousness and am pleased to hear that plaintiffs' counsel is just as determined to comply with the Judge's orders as are we.

I will be getting on an airplane soon and for several hours won't have the pleasure of reading your (or anyone else's) e-mails. But I am sure Tamar, Eben, and Brennan can get a handle on the scheduling issue.

- Steve

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

From: Keith Jensen <kj@kjensenlaw.com>
To: McConnell, Stephen; CBailey@bpblaw.com <CBailey@bpblaw.com>
Cc: jjaffe@weitzlux.com <jjaffe@weitzlux.com>; kaltman@lawampmmt.com <kaltman@lawampmmt.com>; Torregrossa, Brennan; tkelber@Sidley.com <tkelber@Sidley.com>; Flaster, Eben
Sent: Wed Jan 10 22:03:23 2007
Subject: RE: Call

Steve,

Can the witness be made available before the 25th? I think Eben will confirm for you that Judge Baker is quite serious about getting discovery moving and that is his order. Camp and I can't be part of an agreement to amend same.

Things are great, thanks, and I hope the same for you.

Keith

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

From: McConnell, Stephen [mailto:stephen.mccconnell@dechert.com]
Sent: Wednesday, 10 January, 2007 18:32
To: Keith Jensen; CBailey@bpblaw.com
Cc: jjaffe@weitzlux.com; kaltman@lawampmmt.com; Torregrossa, Brennan; tkelber@Sidley.com; Flaster, Eben
Subject: Re: Call

Keith,

As per my earlier message to Camp, one of the witnesses is available on the 23rd. So if you'd like to come to beautiful downtown Wilmington on that date, we'd be delighted to see you. But for the other witness we will need to find another date after the 23rd. Do you have any druthers?

I hope all is well with you.

- Steve

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

From: kj@kjensenlaw.com <kj@kjensenlaw.com>
To: Camp Bailey <cbailey@bpblaw.com>; McConnell, Stephen
Cc: Jonathan Jaffe <jjaffe@weitzlux.com>; Keith Altman <kaltman@lawampmmt.com>
Sent: Wed Jan 10 19:28:58 2007
Subject: Re: Call

Steve, per my 12:40pm email which Camp told me he sent u a 2d time, the 23rd is ok and the only other date is the 19th. Pls include me on your response.
Keith

Sent via BlackBerry from Cingular Wireless

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

From: "Camp Bailey" <CBailey@bpblaw.com>
Date: Wed, 10 Jan 2007 17:59:05
To: "Keith Jensen" <kj@kjensenlaw.com>
Subject: FW: Call

See below. I told them you would respond to their question.

Let me know if you want me to stay involved in getting this set up.

K. Camp Bailey
Attorney at Law

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

From: McConnell, Stephen [mailto:stephen.mcconnell@dechert.com]
Sent: Wednesday, January 10, 2007 3:17 PM
To: Camp Bailey
Cc: Torregrossa, Brennan; Flaster, Eben; tkelber@Sidley.com
Subject: RE: Call

Camp,

Thanks. It turns out that one of the two interviewees is available on the 23rd, but the other is not. Would you like to schedule the one interview on the 23rd and, meanwhile, I'll try to track down dates for the other interviewee?

- Steve

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

From: Camp Bailey [mailto:CBailey@bpblaw.com]
Sent: Wednesday, January 10, 2007 1:48 PM
To: McConnell, Stephen
Cc: Torregrossa, Brennan; Flaster, Eben
Subject: RE: Call

I have been trying to get Keith available to call, but haven't been able yet. He did pass along that the 23rd or 19th (in order of preference) would work for him and our IT guy...

Let me know if those work and I will relay the message...

K. Camp Bailey
Attorney at Law

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

From: McConnell, Stephen [mailto:stephen.mcconnell@dechert.com]
Sent: Tuesday, January 09, 2007 9:18 PM
To: Camp Bailey

Cc: Torregrossa, Brennan; Flaster, Eben
Subject: Re: Call

I never received a call from you. I heard indirectly from Tamar that January 22 does not work for you. What dates do?

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

From: Camp Bailey <CBailey@bpblaw.com>
To: McConnell, Stephen
Cc: Torregrossa, Brennan; Kelber, Tamar B. <tkelber@Sidley.com>
Sent: Mon Jan 08 18:59:22 2007
Subject: RE: Call

Keith Jensen and I will call you back on this in the morning, if possible...

K. Camp Bailey
Attorney at Law

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

From: McConnell, Stephen [mailto:stephen.mcconnell@dechert.com]
Sent: Monday, January 08, 2007 3:48 PM
To: Camp Bailey
Cc: Torregrossa, Brennan; Kelber, Tamar B.
Subject: RE: Call

Camp,

I wanted to chat with you about the IT interviews. It looks like the two witnesses are available on January 22. How does that work for you?

You certainly seem to be busy these days. Please call me when you free up.

- Steve

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

From: cbailey@bpblaw.com [mailto:cbailey@bpblaw.com]
Sent: Monday, January 08, 2007 4:42 PM
To: McConnell, Stephen
Subject: Call

I am running to another meeting right now. I will be able to call you back this evening or first thing in the morning.
Sent via BlackBerry from Cingular Wireless

This e-mail is from Dechert LLP, a law firm, and may contain information that is confidential or privileged. If you are not the intended recipient, do not read, copy or distribute the e-mail or any attachments. Instead, please notify the sender and delete the e-mail and any attachments. Thank you.

Sidley Austin LLP mail server made the following annotations on 01/18/07,
11:55:34:

IRS Circular 230 Disclosure: To comply with certain U.S. Treasury regulations, we inform you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this communication, including attachments, was not intended or written to be used, and cannot be used, by any taxpayer for the purpose of avoiding any penalties that may be imposed on such taxpayer by the Internal Revenue Service. In addition, if any such tax advice is used or referred to by other parties in promoting, marketing or recommending any partnership or other entity, investment plan or arrangement, then (i) the advice should be construed as written in connection with the promotion or marketing by others of the transaction(s) or matter(s) addressed in this communication and (ii) the taxpayer should seek advice based on the taxpayer's particular circumstances from an independent tax advisor.

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