

US District Court
Middle District of Florida

PLAINTIFFS' EXHIBIT

Exhibit Number: 16.20

6:06-md-01769-ACC-DAB

**In Re: Seroquel Products Liability
Litigation**

Date Identified: _____

Date Admitted: _____

Exhibit 16.20

Jaffe, Jonathan

From: Dupre, Andrew [ADupre@McCarter.com]
Sent: Wednesday, June 13, 2007 3:47 PM
To: Pederson, Mike; Jaffe, Jonathan
Cc: Freebery, James J.; Winchester, Tony; Windfelder, Makenzie
Subject: RE: Seroquel Databases

No worries Mike. Just thought that if you had the names of any specific databases you know that you want (from the 30(b)(6) depositions, say) we could hit the ground running. I'm fine with delaying until Tuesday if you want to wait for Jonathan, as long as it is clear we are waiting on Plaintiffs for instruction on this matter. Cheers-

Andrew S. Dupre, Esq.
McCarter & English, LLP
405 North King Street 8th Floor
Wilmington, Delaware 19801
Phone: 302-984-6328
Fax: 302-984-0311

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

From: Pederson, Mike [mailto:MPederson@weitzlux.com]
Sent: Tuesday, June 12, 2007 9:20 PM
To: Dupre, Andrew; Jaffe, Jonathan
Cc: Freebery, James J.; Winchester, Tony; Windfelder, Makenzie
Subject: RE: Seroquel Databases

Andrew:

Just like Jonathan to allow his wife to have their baby this morning. What we want to do is get together with you when he gets back to discuss how any of the databases that may be requested will be produced. We would like to set up a time to speak with your side next Tuesday and we can give you some feedback on what we are looking for.

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

From: Dupre, Andrew [mailto:ADupre@McCarter.com]
Sent: Tuesday, June 12, 2007 1:18 PM
To: Pederson, Mike; Jaffe, Jonathan
Cc: Freebery, James J.; Winchester, Tony; Windfelder, Makenzie
Subject: Seroquel Databases

Mike and Jonathan:

We'd like to work cooperatively with Plaintiffs on the production of relevant databases. It would be very helpful if Plaintiffs could identify at least a few (2 or 3) of the databases they know they will want productions from, so that we could begin the process of gathering information categories and fields to discuss our planned meet and confer. Could you please respond via email with any database names that you are certain to request? The sooner AstraZeneca knows what Plaintiffs want, the sooner we will be able to produce it. Thanks-

Andrew S. Dupre, Esq.
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