

US District Court
Middle District of Florida

PLAINTIFFS' EXHIBIT

Exhibit Number: 16.21

6:06-md-01769-ACC-DAB

**In Re: Seroquel Products Liability
Litigation**

Date Identified:

Date Admitted:

Exhibit 16.21

Jaffe, Jonathan

From: Dupre, Andrew [ADupre@McCarter.com]
Sent: Thursday, June 14, 2007 3:55 PM
To: Pederson, Mike; Jaffe, Jonathan
Cc: Winchester, Tony; Freebery, James J.
Subject: RE: Tech Issues

Great! Any information you can give about what you want beforehand would be appreciated - I am afraid I won't have much to offer if I have to go into the call completely in the dark. Hope you are well-

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: Thursday, June 14, 2007 3:39 PM
To: Dupre, Andrew
Subject: RE: Tech Issues

Andrew, I spoke to Jim and we will have a call on Tuesday with your side on the Data Bases. I will give you the time and number tomorrow.

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

From: Dupre, Andrew [mailto:ADupre@McCarter.com]
Sent: Thursday, June 14, 2007 3:13 PM
To: Pederson, Mike; Jaffe, Jonathan
Cc: Winchester, Tony; Freebery, James J.
Subject: Tech Issues

Hello Mike and Jonathan:

We previously discussed at multiple meet and confer sessions that AstraZeneca would keep Plaintiffs informed of the pace of implementing the agreed resolutions to technical issues as identified in "Plaintiffs Joint Statement of Resolved Issues" filed in the MDL on June 7, 2007. Today two answers warrant your consideration:

1. Swapped MetaData fields: the vendor has completed the agreed investigation of this issue and certified to AstraZeneca that it has found no instances of swapped metadata in the underlying TIFF files. Instead, the vendor has stated that this issue stems solely from inconsistent ordering of objective coding fields in the load files. This issue will therefore be entirely corrected by the issuance of corrected load files.
2. Databases: AstraZeneca has offered to meet and confer with Plaintiffs on the subject of database production. AstraZeneca further offered to begin collecting information from any "hot" databases that Plaintiffs know they will want produced. Plaintiffs have decided to wait to discuss these issues until Jonathan Jaffe's return from paternity leave next week. The parties agree that AstraZeneca will wait until a yet-to-be-scheduled meet and confer session to take action on database collection.

Please contact me if this prompts any questions or concerns.

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

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.