

US District Court
Middle District of Florida

PLAINTIFFS' EXHIBIT

Exhibit Number: 16.23

6:06-md-01769-ACC-DAB

**In Re: Seroquel Products Liability
Litigation**

Date Identified:

Date Admitted:

Exhibit 16.23

Jaffe, Jonathan

From: Dupre, Andrew [ADupre@McCarter.com]
Sent: Wednesday, June 20, 2007 4:10 PM
To: Pederson, Mike; Rhonda Radliff
Cc: Jaffe, Jonathan; Winchester, Tony; Freebery, James J.; Windfelder, Makenzie; Brown, Daniel
Subject: RE: Database Discussion

Mike, what do you mean by "Documentation that is readily available", i.e. the last 3 columns of the sheet?

Andrew S. Dupre, Esq.
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Wilmington, Delaware 19801
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Fax: 302-984-0311

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

From: Pederson, Mike [mailto:MPederson@weltzlux.com]
Sent: Wednesday, June 20, 2007 1:36 PM
To: Dupre, Andrew; Rhonda Radliff
Cc: Jaffe, Jonathan
Subject: Database Discussion

Andrew,

I have sent you a spread sheet of the databases we are interested in. As we discussed yesterday, we would like to have a few questions answered before we can prioritize your production. The spreadsheet contains some of the questions we discussed yesterday. As we explained, we feel we need answers to some of these basic questions before you start production of any databases. For example, if we know the size of a database, as compared to other databases, that will help us prioritize the production. I know the size of a database does not always mean it can be done faster, but this will tell us something on how long it might take to produce. Further, and as we discussed, we don't want to wait until you have gathered all the information for all the databases before you get back to us. The idea was to do a survey of what you can get your hands on in a few days and then let us know, so we can see how long this might take. I would ask that before you send this out to your group you give me a call, so I can clear up any questions you might have before talking to your side.

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