

US District Court
Middle District of Florida

PLAINTIFFS' EXHIBIT

Exhibit Number: 16.24

6:06-md-01769-ACC-DAB

**In Re: Seroquel Products Liability
Litigation**

Date Identified:

Date Admitted:

Exhibit 16.24

Jaffe, Jonathan

From: Pennock, Paul
Sent: Wednesday, June 27, 2007 3:48 PM
To: Fred Magaziner (fred.magaziner@dechert.com)
Cc: Camp Bailey (cbailey@bpblaw.com); Kenneth Bailey (kbailey@bpblaw.com); Allen Scott (sallen@crusescott.com); Edward Blizzard (eblizzard@blizzardlaw.com); Jaffe, Jonathan; Fletch Trammell (ftrammell@bpblaw.com); David P. Matthews (dmatthews@thematthewslawfirm.com); Pederson, Mike; Pirtle, Thomas (tomp@lpm-triallaw.com); Laminack, Richard N. (richl@lpm-triallaw.com); Larry Roth (LROTH@roth-law.com); Lawrence J. Gornick (lgornick@lskg-law.com); Rhonda Radliff (radliff@bpblaw.com)
Subject: Databases

We have identified 59 databases that relate to Seroquel. All of these should have been produced 6 months ago. Instead, you have forced us to dig through the hay stack for months of discovery and numerous "meet and confers", which from our perspective have really been "meet and confounds". We even relented and gave you a list of things that we wanted to know about these 59 databases. You've been on notice that we'd need the information on these databases since this litigation began. We have specified the information we want since February. Two weeks ago, we demanded that you complete a spread sheet with the requested information. Your people come back to us and tell us today that they can give us NONE of the information on ANY of the databases. This was very basic information such as the size, when it was in use, departments that use/used it, the instruction manuals for it, whether you have lists of tables and fields and when we could have them, whether AstraZeneca or a third party vendor maintains it, who the person or department that is responsible for the database requirements and some other similarly minor information. This would have allowed us to prioritize the production to accommodate your needs and wishes, not us. Your people have undermined that cooperative effort. Too much time has passed. We now need the basic information followed by an immediate production of the databases and let me suggest that they be produced in a readily usable form.

The utter failures by your people compel that this issue now be raised with the Judge and we will do so next Thursday. I will ask the Judge to order that all of this information be produced by Monday, July 9th. We will request that all 59 databases be produced within 15 days of the conference.