

US District Court
Middle District of Florida

PLAINTIFFS' EXHIBIT

Exhibit Number: 16.25

6:06-md-01769-ACC-DAB

**In Re: Seroquel Products Liability
Litigation**

Date Identified:

Date Admitted:

Exhibit 16.25

Jaffe, Jonathan

From: Dupre, Andrew [ADupre@McCarter.com]
Sent: Monday, July 02, 2007 7:50 PM
To: Pederson, Mike; Jaffe, Jonathan; Rhonda Radliff
Cc: Torregrossa, Brennan; McConnell, Stephen; Winchester, Tony; Freebery, James J.; Windfelder, Makenzie
Subject: Database Survey
Attachments: AZ Seroquel 7-2-07 Database Chart to Plaintiffs.XLS

Michael:

Attached please find a copy of the survey sheet regarding databases. This sheet has been the subject of a letter exchange between Paul Pennock and Steve McConnell. Some caveats are important here:

1. This represents AZ's effort to compile information in an informal way, from the notes of depositions and by asking general questions. This sheet is not intended to be a verified response to which AZ could swear, i.e. like a response to an RFP. Instead, this sheet represents AZ's effort to quickly collect general information to support a meet/confer process.
2. AZ's investigation is ongoing. Time would allow it to fill in more of the empty spaces.
3. As a general matter, many of these databases duplicate each other. AZ expects the meet/confer process to settle on the best way of getting the information for which you really are looking into Plaintiffs' hands.
4. Provision of this list is not a promise to produce any database. AZ reserves the right to object to production of any database.
5. This list is subject to the confidentiality provisions of the relevant court orders.
6. The time estimates are really estimates, not promises or deadlines.

(D) indicates information taken from a deposition.

Please call Brennan Terragrossa if you would like to discuss database discovery. I am happy to be on the call if it would be helpful. Have a nice holiday-

<<AZ Seroquel 7-2-07 Database Chart to Plaintiffs.XLS>>

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