

US District Court
Middle District of Florida

PLAINTIFFS' EXHIBIT

Exhibit Number: 17.01

6:06-md-01769-ACC-DAB

**In Re: Seroquel Products Liability
Litigation**

Date Identified: _____

Date Admitted: _____

Exhibit 17.01

EXHIBIT 1

Pederson, Mike

From: Miller, Rodney K. [rkmiller@sidley.com]
Sent: Wednesday, February 21, 2007 12:26 PM
To: Jaffe, Jonathan
Cc: Kelber, Tamar B.; cbailey@bpblaw.com; ftrammell@bpblaw.com; kj@kjensenlaw.com; JDriscoll@brownandcrouppen.com; kbailey@bpblaw.com; KSmith@AWS-LAW.com; LROTH@roth-law.com; lgornick@lsg-law.com; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gsnlaw.com; Schultz, Laurie
Subject: RE: Document Production Responses

Jonathan,

We are working with our vendor to come up with a schedule/time frame for future productions, and will forward to you once complete. As far as the next production, and as I believe already has been discussed among the parties, we will produce by March 15th the remaining documents for the first eight custodians.

Your name for the first custodian production is fine, and we will follow suit on our future productions.

Thanks,
Rodney Miller

From: Jaffe, Jonathan [mailto:jjaffe@weitzlux.com]
Sent: Tuesday, February 20, 2007 11:00 AM
To: Miller, Rodney K.
Cc: Kelber, Tamar B.; cbailey@bpblaw.com; ftrammell@bpblaw.com; kj@kjensenlaw.com; JDriscoll@brownandcrouppen.com; kbailey@bpblaw.com; KSmith@AWS-LAW.com; LROTH@roth-law.com; lgornick@lsg-law.com; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gsnlaw.com; Schultz, Laurie
Subject: RE: Document Production Responses

Rodney, is there a calendar of when I should expect future productions (and the rest of the redacted documents for this one) or some procedure to which we both agree so that I have some lead time on the arrivals?

Also, to keep track of these productions administratively, I propose we name the present one for the first eight custodians, Custodian Production #1.

Thanks,
Jonathan Jaffe

From: Miller, Rodney K. [mailto:rkmiller@sidley.com]
Sent: Thursday, February 08, 2007 8:02 AM
To: Jaffe, Jonathan
Cc: cbailey@bpblaw.com; ftrammell@bpblaw.com; kj@kjensenlaw.com; JDriscoll@brownandcrouppen.com; kbailey@bpblaw.com; KSmith@AWS-LAW.com; LROTH@roth-law.com; lgornick@lsg-law.com; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gsnlaw.com;

Schultz, Laurie; Kelber, Tamar B.

Subject: RE: Document Production Responses

Jonathan,

Following up on my message from yesterday, the production was shipped last night to your attention, and should be delivered this morning. A copy of the transmittal letter is attached.

Thanks,
Rodney

From: Miller, Rodney K.

Sent: Wednesday, February 07, 2007 02:13 PM

To: 'Jaffe, Jonathan'

Cc: cbailey@bpblaw.com; ftrammell@bpblaw.com; kj@kjensenlaw.com; JDriscoll@brownandcrouppen.com; kbailey@bpblaw.com; KSmith@AWS-LAW.com; LROTH@roth-law.com; lgornick@lsg-law.com; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gslaw.com; Schultz, Laurie; Kelber, Tamar B.

Subject: RE: Document Production Responses

Jonathan,

We will receive the production set from our vendor later today, and will FedEx it to you for tomorrow delivery. As for your question regarding metadata, the metadata for the documents produced will include control numbers identifying all of their attachments, including control numbers for attachments that are not produced at this time because they are in the process of being redacted.

Thanks,
Rodney

From: Jaffe, Jonathan [mailto:jjaffe@weitzlux.com]

Sent: Wednesday, February 07, 2007 09:48 AM

To: Miller, Rodney K.

Cc: cbailey@bpblaw.com; ftrammell@bpblaw.com; kj@kjensenlaw.com; JDriscoll@brownandcrouppen.com; kbailey@bpblaw.com; KSmith@AWS-LAW.com; LROTH@roth-law.com; lgornick@lsg-law.com; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gslaw.com; Schultz, Laurie; Kelber, Tamar B.

Subject: RE: Document Production Responses

Rodney,

I have not received the documents below yet. Do you have tracking numbers?

Also, I want to confirm again that listed in the metadata will be documents that are yet to be produced because they are in the process of being redacted.

Regards,
Jonathan Jaffe

From: Miller, Rodney K. [mailto:rkmiller@sidley.com]
Sent: Friday, February 02, 2007 4:00 PM
To: Jaffe, Jonathan
Cc: cbailey@bpblaw.com; ftrammell@bpblaw.com; kj@kjensenlaw.com;
JDriscoll@brownandcrouppen.com; kbailey@bpblaw.com; KSmith@AWS-LAW.com;
LROTH@roth-law.com; lgornick@lsg-law.com; MPerrin@bpblaw.com; Pederson, Mike;
Pennock, Paul; pschneider@gsnlaw.com; Schultz, Laurie; Kelber, Tamar B.
Subject: RE: Document Production Responses

Jonathan,

Upon receipt of your response, we sent documents from the eight custodians previously identified to you to the vendor for immediate processing for production. You will receive the documents and related metadata (this production set contains approximately 270,000 pages of documents) on one or more hard drives by next week. The names of the eight custodians are as follows:

- Lisa Boornazian
- John Boorstein
- Kathryn Bradley
- Kim Busch
- Vikram Dev
- Kevin Hamill
- Karin Mueller
- Michael Murray

Thanks,
Rodney

From: Jaffe, Jonathan [mailto:jjaffe@weitzlux.com]
Sent: Friday, February 02, 2007 11:26 AM
To: Miller, Rodney K.
Cc: cbailey@bpblaw.com; ftrammell@bpblaw.com; kj@kjensenlaw.com;
JDriscoll@brownandcrouppen.com; kbailey@bpblaw.com; KSmith@AWS-LAW.com;
LROTH@roth-law.com; lgornick@lsg-law.com; MPerrin@bpblaw.com; Pederson,
Mike; Pennock, Paul; pschneider@gsnlaw.com; Schultz, Laurie
Subject: RE: Document Production Responses

Rodney,

Based on our understanding that you either cannot get the Source Location, or cannot get it without extraordinary effort, we would like to start production. You may leave this field, blank, in the metadata.

Please let us know how soon we can expect files, and for which custodians.

Best regards,

Jonathan Jaffe

From: Miller, Rodney K. [mailto:rkmiller@sidley.com]
Sent: Thursday, February 01, 2007 2:00 PM
To: Jaffe, Jonathan
Subject: RE: Document Production Responses

Jonathan,

As I explained to you on the phone, during the course of drafting CMO2, we discussed with our vendor the metadata fields that would be available to us to produce. Although the source location was identified as an available field, it was not populated with data -- instead, information pertaining to the source is made available to you in the File Location and Source Name metadata fields. Accordingly, when documents are produced, the source location field will be blank (alternatively, we can drop that field from the metadata produced to you).

Please discuss with your team, and let me know if we can begin preparing documents for production under these parameters.

Thanks,
Rodney

From: Jaffe, Jonathan [mailto:jjaffe@weitzlux.com]
Sent: Thursday, February 01, 2007 7:01 AM
To: Miller, Rodney K.
Subject: RE: Document Production Responses

Rodney,

When do you think that you will know about #5?

Thanks,
Jonathan Jaffe

From: Miller, Rodney K. [mailto:rkmiller@sidley.com]
Sent: Tuesday, January 30, 2007 4:56 PM
To: Jaffe, Jonathan
Subject: RE: Document Production Responses

Jonathan,

Additional follow up. With respect to no. 4, a 7-Bit text file is a text file that results when a user opens a non-text document through a text application. For example, if someone opened a JPEG image file in Wordpad, Wordpad may be able to read some

text in the JPEG. If the user were to save the JPEG as a text file, the result is a 7-bit text file.

We're still looking into no. 5.

- Rodney

From: Jaffe, Jonathan [mailto:jjaffe@weitzlux.com]
Sent: Tuesday, January 30, 2007 3:35 PM
To: Miller, Rodney K.
Subject: RE: Document Production Responses

Thank you Rodney. Only #4 and #5 are holding us up now.

From: Miller, Rodney K. [mailto:rkmiller@sidley.com]
Sent: Tuesday, January 30, 2007 4:26 PM
To: Jaffe, Jonathan
Subject: Document Production Responses

Jonathan,

The following provides a status on your questions from earlier today. I will update this e-mail, and provide you estimates on timing of production, as soon as I learn more.

- (1) Sample document AZ/SER 233. The attachment to this document was not produced as part of the sample production, but the control number for the document applies to an existing document that will be produced in the course of the production.
- (2) The 1/1/1801 date. This "date" is used as a default to indicate documents that do not have a date. This date typically applies to paper documents that lack a date printed on the page. Where portions of a date are available -- for example, the year -- that information will be included in the date field.
- (3) Sample document AZ/SER 474 is a paper document that was scanned. We will add to each document's control number a prefix of "E" for electronic document and "P" for paper document.
- (4) 7-Bit Text. This designation typically is given to simple text files. I am continuing to investigate to get a final answer, and will respond as soon as I know more.

(5) Blank "location" field. As with no. 4, I am continuing to investigate, and will respond once I know more.

Thanks,

Rodney K. Miller
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, IL 60603
(312) 853 6098
(312) 853 7036 FAX
rkmiller@sidley.com

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