

US District Court
Middle District of Florida

PLAINTIFFS' EXHIBIT

Exhibit Number: 16.03

6:06-md-01769-ACC-DAB

**In Re: Seroquel Products Liability
Litigation**

Date Identified:

Date Admitted:

Exhibit 16.03

Jaffe, Jonathan

From: Kelber, Tamar B. [tkelber@Sidley.com]
Sent: Thursday, January 11, 2007 12:12 PM
To: CBailey@bpblaw.com; Jaffe, Jonathan
Cc: Miller, Rodney K.; Huey, Nathan A.; dcanty@laskg-law.com; Pederson, Mike;
kj@kjensenlaw.com; kaltman@lawampmmt.com
Subject: Re: Seroquel MDL Document Production

They are

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

From: Camp Bailey <CBailey@bpblaw.com>
To: Kelber, Tamar B. <tkelber@Sidley.com>; jjaffe@weitzlux.com <jjaffe@weitzlux.com>
CC: Miller, Rodney K. <rkmiller@sidley.com>; Huey, Nathan A. <NHuey@Sidley.com>; dcanty@laskg-law.com <dcanty@laskg-law.com>; MPederson@weitzlux.com <MPederson@weitzlux.com>; kj@kjensenlaw.com <kj@kjensenlaw.com>; kaltman@lawampmmt.com <kaltman@lawampmmt.com>
Sent: Thu Jan 11 11:02:38 2007
Subject: RE: Seroquel MDL Document Production

Please make sure that both samples are multipage docs, so we can also make sure the page break tags on the load files will work.

Gracias.

K. Camp Bailey
Attorney at Law

From: Kelber, Tamar B. [mailto:tkelber@Sidley.com]
Sent: Thursday, January 11, 2007 10:46 AM
To: jjaffe@weitzlux.com
Cc: Miller, Rodney K.; Huey, Nathan A.; dcanty@laskg-law.com; MPederson@weitzlux.com; kj@kjensenlaw.com; Camp Bailey; kaltman@lawampmmt.com
Subject: Re: Seroquel MDL Document Production

We're checking with the vendor and will let you know. We plan to send one document that was scanned from a hard copy document and another that was originally an electronic document.

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

From: Jaffe, Jonathan <jjaffe@weitzlux.com>
To: Kelber, Tamar B. <tkelber@Sidley.com>
CC: Miller, Rodney K. <rkmiller@sidley.com>; Huey, Nathan A. <NHuey@Sidley.com>; dcanty@laskg-law.com <dcanty@laskg-law.com>; Pederson, Mike <MPederson@weitzlux.com>; kj@kjensenlaw.com <kj@kjensenlaw.com>; CBailey@bpblaw.com <CBailey@bpblaw.com>; kaltman@lawampmmt.com <kaltman@lawampmmt.com>
Sent: Thu Jan 11 10:14:22 2007
Subject: RE: Seroquel MDL Document Production

Hi Tamar,

I just wanted to know when we can expect to receive the sample load file, extracted text (with page breaks indicated), and TIFFs as we discussed in our last conversation. We want to make sure we have everything squared away on our end.

Best regards,

Jonathan Jaffe

Manager of Software Development
Weitz & Luxenberg, P.C.
212.558.5522 (direct)

From: Kelber, Tamar B. [mailto:tkelber@Sidley.com <mailto:tkelber@Sidley.com>]
Sent: Thursday, January 04, 2007 4:25 PM
To: Camp Bailey
Cc: Miller, Rodney K.; Huey, Nathan A.
Subject: Re: Seroquel MDL Document Production

We haven't heard back from you, and we are supposed to be sending our first production out tomorrow. I understand from your email that we should not send anything out until we do. Thus, we will wait to hear back from you and will not send anything out. If you are going to take the position that we should be producing documents before this issue is resolved, please advise immediately.

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

From: Kelber, Tamar B. <tkelber@Sidley.com>
To: 'CBailey@bpblaw.com' <CBailey@bpblaw.com>
CC: Miller, Rodney K. <rkmler@sidley.com>; Huey, Nathan A. <NHuey@Sidley.com>
Sent: Tue Jan 02 17:06:44 2007
Subject: Re: Seroquel MDL Document Production

Ok. Please get back to us as soon as you can.

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

From: Camp Bailey <CBailey@bpblaw.com>
To: Kelber, Tamar B. <tkelber@Sidley.com>
CC: Miller, Rodney K. <rkmler@sidley.com>; Huey, Nathan A. <NHuey@Sidley.com>
Sent: Tue Jan 02 17:08:36 2007
Subject: RE: Seroquel MDL Document Production

I think we do have an issue with that, as it will greatly increase the difficulty in which we can perform searches on the docs. I am waiting for a follow up from those on my side with a greater understanding of these technical issues than I possess and will get back to you this week for further discussion. We need to resolve this issue before your vendors do a bunch of work that doesn't meet requirements...

Respectfully,

K. Camp Bailey
Attorney at Law

From: Kelber, Tamar B. [mailto:tkelber@Sidley.com <mailto:tkelber@Sidley.com>]
Sent: Monday, January 01, 2007 11:10 PM
To: Camp Bailey
Cc: Miller, Rodney K.; Huey, Nathan A.
Subject: Seroquel MDL Document Production

We are preparing our first set of custodial documents for production. We have been advised by our vendor that the OCR text files cannot be included as part of the load file and cannot be split up into single pages. The OCR files will be named using the beginning and ending Bates numbers. If this presents any issues for you, please advise.

Sidley Austin LLP mail server made the following annotations on 01/01/07, 23:07:59:
