

US District Court  
Middle District of Florida

**PLAINTIFFS' EXHIBIT**

Exhibit Number: 16.04

6:06-md-01769-ACC-DAB

**In Re: Seroquel Products Liability  
Litigation**

Date Identified:  
\_\_\_\_\_

Date Admitted:  
\_\_\_\_\_

# Exhibit 16.04

## **Jaffe, Jonathan**

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**From:** Miller, Rodney K. [rkmiller@sidley.com]  
**Sent:** Monday, January 29, 2007 3:35 PM  
**To:** Jaffe, Jonathan  
**Subject:** RE: Seroquel Sample MDL Production Documents (sidleypass)

Jonathan, I am preparing to ship to you the 100 document sample Seroquel production. Could you please confirm that your address is as follows.

Jonathan Jaffe  
Weitz & Luxenberg  
180 Maiden Lane  
New York, NY 10038

Thanks,  
Rodney

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**From:** Jaffe, Jonathan [mailto:jjaffe@weitzlux.com]  
**Sent:** Friday, January 26, 2007 2:22 PM  
**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; Igornick@lsg-law.com; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gsnlaw.com; Schultz, Laurie  
**Subject:** RE: Seroquel Sample MDL Production Documents (sidleypass)

Rodney, that's fine. When can I expect the sample?

Regards,

Jonathan Jaffe

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**From:** Miller, Rodney K. [mailto:rkmiller@sidley.com]  
**Sent:** Friday, January 26, 2007 12:19 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; Igornick@lsg-law.com; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gsnlaw.com; Schultz, Laurie  
**Subject:** RE: Seroquel Sample MDL Production Documents (sidleypass)

Jonathan, with respect to the attachment solution, the metadata will include a field that contains a unique document "control" number for each document and a second field identifying the "control" number of each attached document. That way, all attachments can be associated with each other.

Unless you advise otherwise, we will implement this process in the sample production set of documents we send to you.

Thanks,  
Rodney

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**From:** Jaffe, Jonathan [mailto:jjaffe@weitzlux.com]  
**Sent:** Friday, January 26, 2007 9:44 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; Igomick@lsg-law.com; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gsnlaw.com; Schultz, Laurie  
**Subject:** RE: Seroquel Sample MDL Production Documents (sidleypass)

Rodney, it's been nearly a week and we are anxious to get started. If you provide me with the sample before noon, then I can review and you can start shipping CDs before the weekend.

Again, there are three ways to handle the attachment issue:

1. Keep the number of attachments field, but make sure the attachments directly follow that document.
2. In the email metadata, provide a list of Bates #s corresponding to the beginning Bates # of each attachment.
3. In each attachment, provide the Bates # of the original email.

Any way you implement this is fine so long as there is a clearly defined link between images of an email and images of the attachments.

Regards,

Jonathan Jaffe

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**From:** Miller, Rodney K. [mailto:rkmiller@sidley.com]  
**Sent:** Monday, January 22, 2007 5:37 PM  
**To:** Jaffe, Jonathan  
**Cc:** Kelber, Tamar B.; CBailey@bpblaw.com; Pederson, Mike; Keith Jensen  
**Subject:** RE: Seroquel Sample MDL Production Documents (sidleypass)

Jonathan,

First, I will respond to your questions from your first Friday e-mail. I spoke with the vendor regarding modifying metadata to include beginning bates ranges for attachments. They tell me that it is possible, but will require significant work to draft the script needed to implement the change. I've asked for a time frame, and will get back to you when I know more. File Location shows where the data is located on the custodian's computer; Source Location is the custodian's geographic location. Page breaks are delineated by a page break character.

Second, we will agree to provide you with a second sample production set, containing approximately 100 documents. I will let you know when that process is complete.

Thanks,  
Rodney

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**From:** Jaffe, Jonathan [mailto:jjaffe@weitzlux.com]  
**Sent:** Friday, January 19, 2007 10:17 AM  
**To:** Miller, Rodney K.  
**Cc:** Kelber, Tamar B.; CBailey@bpblaw.com; Pederson, Mike; Keith Jensen  
**Subject:** RE: Seroquel Sample MDL Production Documents (sidleypass)

Also, would it be possible to receive a more substantive sample of the metadata? I'd like to examine the first 100 records to make sure we cover each case (different document types, emails, etc.). Thanks.

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**From:** Jaffe, Jonathan  
**Sent:** Friday, January 19, 2007 11:13 AM  
**To:** 'Miller, Rodney K.'  
**Cc:** Kelber, Tamar B.; CBailey@bpblaw.com; Pederson, Mike; Keith Jensen  
**Subject:** RE: Seroquel Sample MDL Production Documents (sidleypass)

Honestly I stopped before getting to the .dat file after opening the other three (.txt, .opt, .lpf) and not seeing the metadata.

The format of the dat file is fine.

The last field, attachment information, you modified to number attachments. What we are looking for is really the link to the imaged attachments; otherwise, there is no way to associate an email with its attachments. If all attachments follow the email, then what you have is fine. If not, then please modify that to have a list of Bates numbers corresponding to the starting Bates number of each attachment.

Can you explain your understanding of the distinction between File Location and Source Location?

Finally, how are you delineating the page breaks in the text files?

Thanks,  
Jonathan Jaffe

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**From:** Miller, Rodney K. [mailto:rkmill@sidley.com]  
**Sent:** Friday, January 19, 2007 9:35 AM  
**To:** Jaffe, Jonathan  
**Cc:** Kelber, Tamar B.; CBailey@bpblaw.com; Pederson, Mike; Keith Jensen  
**Subject:** RE: Seroquel Sample MDL Production Documents (sidleypass)

Jonathan, we sent to you two sample documents that are standard for Summation and Concordance loading. Because we sent you both a paper source document and electronic source document, only the latter will have (and does have) the metadata required by CMO2 -- the paper document will have only the accompanying OCR text file and information regarding the document's source, and beginning and ending Bates numbers. The metadata for the electronic document is contained in the .dat file included in the files sent.

With respect to your request for the load file to have one line per image, your request for single-page TIFF images is contrary to that request; the format

provided to you is standard for single page TIFF images. If your e-mail is a request to modify the standard format to a multi-page load file (but still with single page TIFF images), we can discuss with our vendor whether it would be feasible to comply with such a request.

As for the Bates labeling concern, as expressed to you yesterday, the numbers on these sample documents were provided solely for the purpose of determining compatibility with your system. When these documents are produced as part of a custodian production, the numbers will follow the convention used with the IND and NDA.

Please let me know as soon as possible regarding the single line request -- and any other issues that remain -- as soon as possible, as we need your responses before we can continue to produce custodial documents.

Thanks,  
Rodney

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**From:** Jaffe, Jonathan [mailto:[jjaffe@weitzlux.com](mailto:jjaffe@weitzlux.com)]  
**Sent:** Thursday, January 18, 2007 11:38 AM  
**To:** Miller, Rodney K.  
**Cc:** Kelber, Tamar B.; [CBailey@bpblaw.com](mailto:CBailey@bpblaw.com); Pederson, Mike; Keith Jensen  
**Subject:** RE: Seroquel Sample MDL Production Documents (sidleypass)

Rodney,

We need a sample with all of the load file fields filled out as specified in CMO2. These do not correspond in any way to that. Also, I'm confused on your Bates sequence; it does not follow convention with the IND and NDA and there are no leading zeros.

As specified, the load file should have one line per image. Go off of the CMO, but I believe this was the list:

- (a) Electronic document type;
- (b) Create date;
- (c) File name
- (d) File location;
- (e) Source location;
- (f) Starting production number;
- (g) Ending production number;
- (h) Custodian;
- (i) Last date modified;
- (j) Author;
- (k) Recipient(s);
- (l) Document date (if different from create date);
- (m) cc(s);
- (n) bcc(s);
- (o) Subject;
- (p) Title; and
- (q) Attachment information (for e-mails).

Thank you,

Jonathan Jaffe

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**From:** Miller, Rodney K. [mailto:rkmiller@sidley.com]  
**Sent:** Thursday, January 11, 2007 8:04 PM  
**To:** Jaffe, Jonathan  
**Cc:** Kelber, Tamar B.; CBailey@bpblaw.com  
**Subject:** RE: Seroquel Sample MDL Production Documents (sidleypass)

Jonathan and Camp,

I apologize, but it appears my firm's security software deleted the attachment from my earlier message. Please let me know if it does not come through this time.

- Rodney

<<Test Production.zip>>

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**From:** Miller, Rodney K.  
**Sent:** Thursday, January 11, 2007 6:59 PM  
**To:** 'jjaffe@weitzluc.com'  
**Cc:** Kelber, Tamar B.; 'CBailey@bpblaw.com'  
**Subject:** Seroquel Sample MDL Production Documents

Jonathan,

As we discussed earlier this week, pursuant to plaintiffs' request, the attached ZIP file contains samples of two AstraZeneca documents (one an electronic document, one scanned from a paper document) in the format we intend to use for our custodial document productions. Please note that the Bates numbers assigned to these documents are not their actual numbers, but were used solely for the purpose of this sampling. These documents will be included in our next production. Please advise whether you have any issues with the format of these documents at your earliest convenience so that we may begin our production of custodial documents as quickly as possible.

Thank you,

Rodney K. Miller  
SIDLEY AUSTIN LLP  
One South Dearborn  
Chicago, IL 60603  
(312) 853 6098  
(312) 853 7036 FAX  
rkmiller@sidley.com  
<< File: Test Production.zip >>