

US District Court
Middle District of Florida

PLAINTIFFS' EXHIBIT

Exhibit Number: 16.05

6:06-md-01769-ACC-DAB

**In Re: Seroquel Products Liability
Litigation**

Date Identified:

Date Admitted:

Exhibit 16.05

Jaffe, Jonathan

From: Jaffe, Jonathan
Sent: Friday, February 02, 2007 12:26 PM
To: 'Miller, Rodney K.'
Cc: Camp Bailey (cbailey@bpblaw.com); Fletch Trammell (ftrammell@bpblaw.com); Jensen, Keith M. (kj@kjensenlaw.com); John Driscoll (JDriscoll@brownandcrouppen.com); Kenneth Bailey (kbailey@bpblaw.com); Kenneth W. Smith (KSmith@AWS-LAW.com); Larry Roth (LROTH@roth-law.com); Lawrence J. Gornick (lgornick@lsg-law.com); Mike Perrin (MPerrin@bpblaw.com); Pederson, Mike; Pennock, Paul; Pete Schneider (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

Sidley Austin LLP mail server made the following annotations on 01/30/07, 15:24:00:

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Sidley Austin LLP mail server made the following annotations on 01/30/07, 15:53:20: