

US District Court
Middle District of Florida

PLAINTIFFS' EXHIBIT

Exhibit Number: 16.09

6:06-md-01769-ACC-DAB

**In Re: Seroquel Products Liability
Litigation**

Date Identified:

Date Admitted:

Exhibit 16.09

Jaffe, Jonathan

From: Dupre, Andrew [ADupre@McCarter.com]
Sent: Tuesday, June 05, 2007 3:21 PM
To: Jaffe, Jonathan; Pederson, Mike
Cc: Freebery, James J.; Winchester, Tony; Yeager, Joe
Subject: Seroquel - Today's Meet & Confer

Michael and Jonathan:

This email is meant to memorialize our call of 2 p.m. today, to indicate the increase in issues that we now agree are resolved (now 13 of 15), and to attempt to agree with Plaintiffs that only 2 issues need further discussion:

Resolved Issues

Corrected Load Files
Metadata Consistency
Swapped MetaData Fields
Page Breaks
Objective Coding
Redaction Logs
IP10 Production
CANDA
Foreign Language Documents
30(b)(6) Deposition Documents
Production Key
Privilege Logs
Data Collection

Remaining Issues

1. Blank Documents - my technical team is still investigating this issue. AstraZeneca will implement a solution, but we have not yet been able to identify the source of the problem. The additional documents identified in Jonathan's email sent today are included in this investigation.
2. Excel Spreadsheets - Plaintiffs want native files of all Excel spreadsheets with all metadata. AstraZeneca wants to provide native files with only the metadata fields to which the parties previously stipulated, and which the Court ordered in CMO2 III.B. AstraZeneca therefore offered to implement the solution suggested by Plaintiffs (Jonathan Jaffe) to eliminate the additional metadata fields. AstraZeneca yesterday ordered its production vendor to scope a work plan for that solution. Plaintiffs today indicated that they do not prefer that proposal, but may be willing to accept it. We agreed to discuss this further tomorrow. If Plaintiffs are willing to stick with Mr. Jaffe's earlier proposal, I believe this issue is resolved.

We agreed to talk again tomorrow regarding resolution of these final issues. Feel free to contact me any time.

Andrew S. Dupre, Esq.
McCarter & English, LLP
919 N. Market Street, 18th Floor
Wilmington, Delaware 19801
Phone: 302-984-6328
Fax: 302-984-0311

Jaffe, Jonathan

From: Pederson, Mike
Sent: Tuesday, June 05, 2007 3:06 PM
To: 'Dupre, Andrew'; 'Freebery, James J.'
Cc: 'Chuck Hunger'; 'Rhonda Radliff'; Jaffe, Jonathan; Camp Bailey (cbailey@bpblaw.com)
Subject: IT issues

Andrew,

Before we can agree that the issues we have been discussing have been resolved, Plaintiffs need to have timelines in writing for the completion of the agreed changes. We need to know when the corrected Load Files will be provided, when the swapped MetaData Fields will be corrected, when the page breaks will be provided etc. We can't agree that these issues are resolved until we know when the changes will be completed and the corrected information will be provided. This is critical due to the time constraints we are all operating under. Please let us know as soon as you can.