

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

IN RE: Seroquel Products Liability Litigation

MDL DOCKET NO. 1769

This Document Relates to ALL CASES

ASTRAZENECA'S DESIGNATION OF EXHIBITS

Pursuant to the Court's July 6, 2007 Order, AstraZeneca hereby designates the following exhibits for the July 26 Evidentiary Hearing:

- I. IND/NDA
 1. September 11, 2006 Order
 2. November 10, 2006 Letter from R. Miller to C. Bailey enclosing Seroquel® IND and NDA
 3. March 2, 2007 MDL Hearing Transcript; 5:14-20 plaintiffs indicate they have received and reviewed a complete copy of the Seroquel® IND and NDA.
 4. April 12, 2007 MDL Hearing Transcript; 8:24-9:7 plaintiffs raise CANDA database.
 5. May 11, 2007 Letter from F. Magaziner to P. Pennock regarding CANDA
 6. E-mail correspondence regarding document production
 7. June 10, 2007 Letter from J. Yeager to J. Jaffe enclosing CANDA
- II. Organizational Charts Produced
 8. Original Production of Organizational Charts
 9. Additional Organizational Charts Produced

10. Organizational Charts Produced at the 30(b)(6) Deposition of Ann Booth-Barbarin.
11. Organizational Charts Produced at the 30(b)(6) Deposition of Jamie Mullen
12. Organizational Charts Produced at the 30(b)(6) Deposition of Vita Petrick
13. Organizational Charts Produced at the 30(b)(6) Deposition of Katherine Bradley
14. Organizational Charts Produced at the 30(b)(6) Deposition of Charles Peipher
15. July 16, 2007 e-mail from K. Kerns to P. Pennock regarding organizational charts produced

III. Custodial Production

16. Chart tracking AstraZeneca's document production to date
17. Chart illustrating AstraZeneca's production of electronic documents
18. June 7, 2007 Joint Statement of Resolved Issues
19. June 8, 2007 Order
20. CMO 2
21. June 1, 2007 letter from J. Freebery to M. Pederson responding to technical issues
22. June 7, 2007 e-mail from M. Pederson to A. Dupre acknowledging that technical issues may arise
23. June 13, 2007 correspondence from A. Dupre to M. Pederson regarding update on technical issues
24. July 18, 2007 letter from J. Yeager to J. Jaffe addressing technical issues regarding custodial production
25. E-mail correspondence regarding AstraZeneca's resolution of technical issues
26. June 12, 2007 e-mail from A. Dupre to M. Pederson attaching amended certification

27. June 26, 2007 e-mail from M. Pederson to J. Freebery regarding approval of certification
28. June 29, 2007 letter from A. Winchester to M. Pederson and C. Bailey confirming completion of custodial production.
29. November 15, 2006 correspondence from Plaintiffs regarding preservation order; discussion regarding use of search terms
30. April 30, 2007 Certification of Complete Custodial Production and List of Search Terms
31. December 24, 2006 e-mail to Plaintiffs identifying 80 custodians
32. Chart listing first 80 custodians and their positions at AstraZeneca by year
33. Chart listing positions held by Kimberly Busch at AstraZeneca
34. Correspondence regarding definition of custodial file
35. May 7, 2007 letter from J. Yeager to J. Jaffe enclosing portion of custodial production
36. May 8, 2007 letter from A. Winchester to P. Pennock and C. Bailey confirming production of nine custodians
37. May 14, 2007 letter from J. Yeager to J. Jaffe enclosing portion of custodial
38. May 22, 2007 letter from J. Yeager to J. Jaffe enclosing portion of custodial production
39. May 30, 2007 letter from J. Yeager to J. Jaffe enclosing portion of custodial production
40. May 31, 2007 letter from J. Yeager to J. Jaffe enclosing portion of custodial production
41. June 25, 2007 letter from J. Yeager to J. Jaffe enclosing portion of custodial production
42. July 2, 2007 letter from J. Yeager to J. Jaffe enclosing documents responsive to Plaintiffs' Amended Request for Production

IV. Databases

43. Jon Dowling 30(b)(6) Transcript May 9, 2007

44. Jon Dowling 30(b)(6) Transcript May 10, 2007
45. Jon Dowling Resume
46. Darryl Draper 30(b)(6) Transcript May 17, 2006
47. Darryl Draper 30(b)(6) Transcript May 18, 2007
48. E-mail correspondence between A. Dupre and M. Pederson regarding databases
49. June 29, 2007 e-mail from S. McConnell to P. Pennock regarding databases
50. July 2, 2007 e-mail from A. Dupre to M. Pederson attaching completed survey sheet requested by Plaintiffs

V. Correspondence

51. Correspondence regarding meet and confer on Plaintiffs' sanctions motion
52. May 31, 2007 letter from J. Freebury to M. Pederson regarding resolution of technical issues
53. June 5, 2007 email from M. Pederson to J. Freebury regarding resolution of technical issues

VI. Transcripts

54. December 11, 2006 MDL Hearing Transcript
55. March 2, 2007 MDL Hearing Transcript
56. April 12, 2007 MDL Hearing Transcript; 12:12-13:21, 30:24-31:16

Respectfully submitted on this the 23rd day of July, 2007,

/s/ Stephen J. McConnell

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CERTIFICATE OF SERVICE

I hereby certify that, on July 23, 2007, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I further certify that I mailed the foregoing document and the notice of electronic filing by first-class mail to the non-CM/ECF participants listed on the attached Service List.

/s/ A. Elizabeth Balakhani

SERVICE LIST

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MDL Docket No. 1769**

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