EXHIBIT 43

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Page 1
1
            IN THE SUPERIOR COURT
          OF THE STATE OF DELAWARE
2
         IN AND FOR NEW CASTLE COUNTY
3
    IN RE:
    SEROQUEL LITIGATION : MDL NO. 1769
4
    THIS DOCUMENT RELATES:
5
    TO ALL ACTIONS
6
    IN RE:
                       : SUPERIOR COURT
    RISPERDAL/SEROQUEL/ : OF NEW JERSEY
7
    ZYPREXA LITIGATION : LAW DIVISION
                      : MIDDLESEX COUNTY
8
                      : CASE NO. 274
     AIMEE DANIELS, : IN THE CIRCUIT
9
                      : COURT OF THE
10
          V.
                      : COUNTY OF ST. LOUIS
                      : STATE OF
11
   ASTRAZENECA
                      : MISSOURI
    PHARMACEUTICALS, L.P.: 05CC-004759
12
                 : DIVISION 6
    _____
    SANTOS MALDANADO, : IN THE CIRCUIT
13
    minor, by and through: COURT OF THE
    his natural mother : COUNTY OF ST. LOUIS
14
    and next friend,
                      : STATE OF
                      : MISSOURI
    LOUISE WILSON
15
                       : 06CC-003930
          V.
    JANSSEN PHARMACEUTICA: DIVISION 6
16
    L.P., ET AL.
17
                  May 9, 2007
18
             CONFIDENTIAL
19
           30(b)(6) deposition of ASTRAZENECA
    PHARMACEUTICALS, L.P., by and through JON
20
    DOWLING.
21
             Golkow Technologies, Inc.
22
                   Suite 760
           1880 John F. Kennedy Boulevard
23
          Philadelphia, Pennsylvania 19103
                  877.370.3377
24
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Pag LENA BARNETT, minor,: IN THE CIRCUIT by and through her : COURT OF THE natural mother and : COUNTY OF ST. LOUIS next friend, : STATE OF MARY BARNETT : MISSOURI V. : 06CC-000333 JANSSEN PHARMACEUTICA: DIVISION 6 L.P., ET. AL. : LOIS BAER, as : IN THE CIRCUIT Representative of the: COURT OF THE Estate of MATTHEW : COUNTY OF ST. LOUIS BAER, Deceased : STATE OF V. : MISSOURI JANSSEN PHARMACEUTICA: 06CC-002401 L.P., ET. AL. : DIVISION 6 TERRY STRINGER : IN THE CIRCUIT COURT OF THE V. : COUNTY OF ST. LOUIS STATE OF JANSSEN PHARMACEUTICA: MISSOURI L.P., ET. AL. : 06CC-002173 : DIVISION 6 STEPHEN ROSAS : IN THE CIRCUIT COURT OF THE V. : COUNTY OF ST. LOUIS STEPHEN ROSAS : IN THE CIRCUIT ASTRACACA : MISSOURI PHARMACEUTICALS, : 05CC-004755 L.P., ET. AL. : DIVISION 6 PAMELA MOORE, : IN THE CIRCUIT PAMELA MOORE, : IN THE CIRCUIT SCOUNTY OF ST. LOUIS JANSSEN PHARMACEUTICALS, : 05CC-004755 L.P., ET. AL. : DIVISION 6 JANSSEN PHARMACEUTICALS, : 05CC-004755 L.P., ET. AL. : DIVISION 6 JANSSEN PHARMACEUTICAL MISSOURI PHARMACEUTICALS, : 05CC-004755 L.P., ET. AL. : DIVISION 6 JANSSEN PHARMACEUTICAL MISSOURI PHARMACEUTICAL MISSOURI PAMELA MOORE, : IN THE CIRCUIT JANSSEN PHARMACEUTICAL MISSOURI L.P., ET. AL. : DIVISION 6 JANSSEN PHARMACEUTICAL MISSOURI L.P., ET. AL. : 05CC-006375 : DIVISION 6		1 2 3 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	AYLSTOCK, WITKIN & SASSER, PLC BY: KENNETH W. SMITH, ESQUIRE 4400 Bayou Boulevard, Suite 58 Pensacola, Florida 32503-2673 850-916-7450 ksmith@aws-law.com Representing Plaintiffs in New Jersey and Delaware SHELLER LUDWIG & SHELLER, PC BY: STEPHEN SHELLER, ESQUIRE and BY: THOMAS E. MELLON, III, ESQUIRE 3rd Floor 1528 Walnut Street Philadelphia, Pennsylvania 19102 215-790-7300 tmellon@sheller.com Representing Plaintiffs in New Jersey DECHERT LLP BY: BRENNAN J. TORREGROSSA, ESQUIRE and BY: A. ELIZABETH BALAKHANI, ESQUIRE Cira Centre, 2929 Arch Street Philadelphia, PA 19104 215-994-2358 215-994-2487 brennan.torregrossa@dechert.com elizabeth.balakhani@dechert.com Representing AstraZeneca	Page 4
Page 1 KATHRYN SCHULTZ, : SUPERIOR COURT OF ET. AL. : THE STATE OF 2 : CALIFORNIA IN AND V. : FOR THE COUNTY OF 3 : SAN FRANCISCO ASTRAZENECA : CGC-06-453676 4 PHARMACEUTICALS, : L.P., ET.AL. : 5	ie 3	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 166 17 188 199 201 222 23 24		Page 5

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1		e 6 1	(It is hereby stipulated and	Page 8
2	INDEX	2	, , ,	
3		3	agreed by and among counsel that	
4	Toctimony of JON DOWN INC		sealing, filing and certification	
5	Testimony of: JON DOWLING	4	are waived; and that all	
6	By Mr. Smith 8	5	objections, except as to the form	
7	,	6	of questions, be reserved until	
١.		7	the time of trial.)	
8	EVUIDITO	8		
9	EXHIBITS	9	JON DOWLING, after having	
´	-	10	been duly sworn, was examined and	
10		11	testified as follows:	
11	NO. DESCRIPTION PAGE	12		
12	Dowling-1 AstraZeneca LP and	13	EXAMINATION	
12	AstraZeneca	14		
13	Pharmaceuticals LP's Cross-Notice of Rule	15	BY MR. SMITH:	
14	30(b)(6) Depositions 11	16	Q. Good morning, Mr. Dowling,	
15	Dowling-2 Resume 75	17	nice to see you again. You understand	
16		18	that first, would you please state	
17		19	your name for the record?	
18 19		20	A. Jon Dowling.	
20		21	Q. Your address?	
21		1	-	
22		22	A. 2624 Bittersweet Drive,	
23		23	Wilmington, Delaware is 19840.	
24		24	Q. Your place of employment?	
	Pag	je 7		Page 9
1	Pa(je 7 1	A. AstraZeneca.	Page 9
		1		Page 9
2	Pag DEPOSITION SUPPORT INDEX	1 2	Q. In Wilmington?	Page 9
2 3		1 2 3	Q. In Wilmington?A. Wilmington, Delaware.	Page 9
2 3 4	DEPOSITION SUPPORT INDEX	1 2 3 4	Q. In Wilmington?A. Wilmington, Delaware.Q. You understand you are under	Page 9
2 3 4 5	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer	1 2 3 4 5	Q. In Wilmington?A. Wilmington, Delaware.Q. You understand you are under oath today?	Page 9
2 3 4 5 6	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line	1 2 3 4 5 6	Q. In Wilmington?A. Wilmington, Delaware.Q. You understand you are under oath today?A. Yes.	Page 9
2 3 4 5 6 7	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line 42 14	1 2 3 4 5 6 7	 Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed 	Page 9
2 3 4 5 6 7 8	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line	1 2 3 4 5 6 7 8	Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed before?	Page 9
2 3 4 5 6 7 8 9	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line 42 14 56 9	1 2 3 4 5 6 7 8 9	Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed before? A. No, I have not.	Page 9
2 3 4 5 6 7 8 9	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line Page Line 42 14 56 9 Request for Production of Documents	1 2 3 4 5 6 7 8 9	Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed before? A. No, I have not. Q. I'm going to ask you	Page 9
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2 3 4 5 6 7 8 9 10 11 12	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line Page Line 42 14 56 9 Request for Production of Documents	1 2 3 4 5 6 7 8 9 10 11 12	Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed before? A. No, I have not. Q. I'm going to ask you questions, they may not always be clear to you. If they're not, would you please	Page 9
2 3 4 5 6 7 8 9 10 11 12 13	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line Page Line 42 14 56 9 Request for Production of Documents Page Line Page Line Page Line	1 2 3 4 5 6 7 8 9 10 11 12 13	Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed before? A. No, I have not. Q. I'm going to ask you questions, they may not always be clear to you. If they're not, would you please stop and say I don't understand that or	Page 9
2 3 4 5 6 7 8 9 10 11 12 13 14	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line Page Line 42 14 56 9 Request for Production of Documents Page Line Page Line Page Line None	1 2 3 4 5 6 7 8 9 10 11 12 13 14	Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed before? A. No, I have not. Q. I'm going to ask you questions, they may not always be clear to you. If they're not, would you please stop and say I don't understand that or ask me to rephrase the question, I'll be	Page 9
2 3 4 5 6 7 8 9 10 11 12 13 14 15	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line Page Line 42 14 56 9 Request for Production of Documents Page Line Page Line Page Line None Stipulations	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed before? A. No, I have not. Q. I'm going to ask you questions, they may not always be clear to you. If they're not, would you please stop and say I don't understand that or ask me to rephrase the question, I'll be happy to do that? I don't want you to	Page 9
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line Page Line 42 14 56 9 Request for Production of Documents Page Line Page Line Page Line None Stipulations Page Line Page Line Page Line	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed before? A. No, I have not. Q. I'm going to ask you questions, they may not always be clear to you. If they're not, would you please stop and say I don't understand that or ask me to rephrase the question, I'll be happy to do that? I don't want you to answer the question if you don't	Page 9
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line Page Line 42 14 56 9 Request for Production of Documents Page Line Page Line Page Line None Stipulations	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed before? A. No, I have not. Q. I'm going to ask you questions, they may not always be clear to you. If they're not, would you please stop and say I don't understand that or ask me to rephrase the question, I'll be happy to do that? I don't want you to answer the question if you don't understand it. We want the answers to	Page 9
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line Page Line 42 14 56 9 Request for Production of Documents Page Line Page Line Page Line None Stipulations Page Line Page Line Page Line	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed before? A. No, I have not. Q. I'm going to ask you questions, they may not always be clear to you. If they're not, would you please stop and say I don't understand that or ask me to rephrase the question, I'll be happy to do that? I don't want you to answer the question if you don't understand it. We want the answers to	Page 9
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line Page Line 42 14 56 9 Request for Production of Documents Page Line Page Line Page Line None Stipulations Page Line 8 1	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed before? A. No, I have not. Q. I'm going to ask you questions, they may not always be clear to you. If they're not, would you please stop and say I don't understand that or ask me to rephrase the question, I'll be happy to do that? I don't want you to answer the question if you don't understand it. We want the answers to match up with the questions. We'll take a break at any	Page 9
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line Page Line 42 14 56 9 Request for Production of Documents Page Line Page Line Page Line None Stipulations Page Line Page Line Page Line 8 1 Question Marked	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed before? A. No, I have not. Q. I'm going to ask you questions, they may not always be clear to you. If they're not, would you please stop and say I don't understand that or ask me to rephrase the question, I'll be happy to do that? I don't want you to answer the question if you don't understand it. We want the answers to match up with the questions. We'll take a break at any time you need one. Otherwise, we'll take one about once an hour. I'll need you to	Page 9
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line Page Line 42 14 56 9 Request for Production of Documents Page Line Page Line Page Line None Stipulations Page Line Page Line Page Line 8 1 Question Marked Page Line Page Line Page Line Page Line Page Line	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed before? A. No, I have not. Q. I'm going to ask you questions, they may not always be clear to you. If they're not, would you please stop and say I don't understand that or ask me to rephrase the question, I'll be happy to do that? I don't want you to answer the question if you don't understand it. We want the answers to match up with the questions. We'll take a break at any time you need one. Otherwise, we'll take one about once an hour. I'll need you to answer questions verbally. We all have a	Page 9
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	DEPOSITION SUPPORT INDEX Direction to Witness Not to Answer Page Line Page Line Page Line 42 14 56 9 Request for Production of Documents Page Line Page Line Page Line None Stipulations Page Line Page Line Page Line 8 1 Question Marked Page Line Page Line Page Line Page Line Page Line	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. In Wilmington? A. Wilmington, Delaware. Q. You understand you are under oath today? A. Yes. Q. And have you been deposed before? A. No, I have not. Q. I'm going to ask you questions, they may not always be clear to you. If they're not, would you please stop and say I don't understand that or ask me to rephrase the question, I'll be happy to do that? I don't want you to answer the question if you don't understand it. We want the answers to match up with the questions. We'll take a break at any time you need one. Otherwise, we'll take one about once an hour. I'll need you to	Page 9

I					
		Page 10			Page 12
1	across very clearly in the record. So if		1	Pharmaceuticals LP's Cross-Notice	
2	you'll say yes or no, and you may need to		2	of Rule 30(b)(6) Depositions, was	
3	explain that, but if you'll give a yes or		3	marked for identification.)	
4	no, then that would help.		4		
5	So if you answer my		5	(Interruption.)	l
6	question, I'm going to assume that you're		6		
7	telling the truth, giving me the whole		7	THE WITNESS: This document	
8	answer and you understood the question.		8	you handed me, the actual things I	
9	Is that fair?		9	would be familiar with would be I	
10	A. Yes.		10	guess it's called Exhibit B. I	
11	Q. My name is Kenneth Smith. I		11	recall reading this. This looks	
12	•				
	represent a number of plaintiffs in the		12	more like what I've seen.	
13	litigation. I'm taking this on behalf of		13	BY MR. SMITH:	
14	the plaintiffs in the MDL. I'm also pro		14	Q. Exhibit B being the letter	
15	hoc'd into the Delaware litigation and		15	from Mr. Magaziner to Mr. Allen?	
16	into the New Jersey litigation.		16	A. I believe so. I don't	
17	MR. TORREGROSSA: Can I just		17	recall seeing the first one. They look	
18	get the agreement from the Sheller		18	very similar. Definitely haven't seen	
19	folks that they've signed on to		19	the stuff in the middle, Exhibit A.	
20	the stipulation before you get		20	Q. Why don't we look at Exhibit	
21	into substance here? If you guys		21	B, on page 3 there is a list of databases	
22	could state on the record that you		22	or systems. Could you, or your counsel	
23	agree to be bound by the MDL		23	if you prefer, go through and check off	
24	stipulation, whatever final		24	on the record the databases that we're	
l					
	•	Page 11			Page 13
1	form	Page 11	1	going to talk about today?	Page 13
2	MR. SHELLER: Subject to	Page 11	2	A. My familiarity on this list	Page 13
2 3	MR. SHELLER: Subject to Judge Garruto's, whatever he does	Page 11		A. My familiarity on this list going down would be SAP, Touchstone,	Page 13
2 3 4	MR. SHELLER: Subject to	Page 11	2	A. My familiarity on this list	Page 13
2 3	MR. SHELLER: Subject to Judge Garruto's, whatever he does	Page 11	2 3	A. My familiarity on this list going down would be SAP, Touchstone,	Page 13
2 3 4	MR. SHELLER: Subject to Judge Garruto's, whatever he does with it.	Page 11	2 3 4	A. My familiarity on this list going down would be SAP, Touchstone, Compass, NICE, MACS, KNOWBOL, ICON,	Page 13
2 3 4 5	MR. SHELLER: Subject to Judge Garruto's, whatever he does with it. MR. MELLON: And Tom Mellon	Page 11	2 3 4 5	A. My familiarity on this list going down would be SAP, Touchstone, Compass, NICE, MACS, KNOWBOL, ICON, SnapPharma, AZER, ViewPoint,	Page 13
2 3 4 5 6	MR. SHELLER: Subject to Judge Garruto's, whatever he does with it. MR. MELLON: And Tom Mellon agrees as well. MR. SHELLER: That's Judge	Page 11	2 3 4 5 6	A. My familiarity on this list going down would be SAP, Touchstone, Compass, NICE, MACS, KNOWBOL, ICON, SnapPharma, AZER, ViewPoint, LectureBureau Express, PREP and Northstar.	Page 13
2 3 4 5 6 7	MR. SHELLER: Subject to Judge Garruto's, whatever he does with it. MR. MELLON: And Tom Mellon agrees as well. MR. SHELLER: That's Judge Garruto for New Jersey.	Page 11	2 3 4 5 6 7	A. My familiarity on this list going down would be SAP, Touchstone, Compass, NICE, MACS, KNOWBOL, ICON, SnapPharma, AZER, ViewPoint, LectureBureau Express, PREP and Northstar. Q. And SnapPharma should be a	Page 13
2 3 4 5 6 7 8	MR. SHELLER: Subject to Judge Garruto's, whatever he does with it. MR. MELLON: And Tom Mellon agrees as well. MR. SHELLER: That's Judge Garruto for New Jersey. MR. SMITH: Do you want to	Page 11	2 3 4 5 6 7 8 9	A. My familiarity on this list going down would be SAP, Touchstone, Compass, NICE, MACS, KNOWBOL, ICON, SnapPharma, AZER, ViewPoint, LectureBureau Express, PREP and Northstar. Q. And SnapPharma should be a P-H instead of an F?	Page 13
2 3 4 5 6 7 8 9	MR. SHELLER: Subject to Judge Garruto's, whatever he does with it. MR. MELLON: And Tom Mellon agrees as well. MR. SHELLER: That's Judge Garruto for New Jersey.	Page 11	2 3 4 5 6 7 8 9	A. My familiarity on this list going down would be SAP, Touchstone, Compass, NICE, MACS, KNOWBOL, ICON, SnapPharma, AZER, ViewPoint, LectureBureau Express, PREP and Northstar. Q. And SnapPharma should be a P-H instead of an F? A. Yes, and MAX should be	Page 13
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2 3 4 5 6 7 8 9 10 11	MR. SHELLER: Subject to Judge Garruto's, whatever he does with it. MR. MELLON: And Tom Mellon agrees as well. MR. SHELLER: That's Judge Garruto for New Jersey. MR. SMITH: Do you want to identify yourselves for the record? MR. TORREGROSSA: Brennan	Page 11	2 3 4 5 6 7 8 9 10 11	A. My familiarity on this list going down would be SAP, Touchstone, Compass, NICE, MACS, KNOWBOL, ICON, SnapPharma, AZER, ViewPoint, LectureBureau Express, PREP and Northstar. Q. And SnapPharma should be a P-H instead of an F? A. Yes, and MAX should be M-A-C-S. Q. Do you know what the other	Page 13
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1	Aliabadi, and I agree to be bound		1	not include applications that did not	
2	by the MDL stipulation.		2	involve databases, did it?	
3	BY MR. SMITH:		3	 A. That would be correct. 	
4	Q. Do you understand you've		4	Q. What are some of the	
5	been designated as a corporate designee		5	applications that you work with that are	
6	by AstraZeneca on certain topics for		6	not included on that list because they	
7	today?		7	don't involve databases?	
8	A. Yes, I do.		8	A. Let me think about that.	
9	Q. And did you agree to serve		9	Web sites come to mind.	
10	in that function?		10	Q. What is your involvement	
11	A. Yes, I did.		11	with Web sites?	
12	•				
13	——————————————————————————————————————		12	A. We ensure the operations are	
1	AstraZeneca is a defendant in this		13	up and running, the systems supporting	
14	action?		14	them, working with the to make sure	
15	A. Yes, I do.		15	they run.	
16	Q. What is your current		16	Q. What types of systems	
17	position with AstraZeneca?		17	support the Web sites?	
18	 A. My position is senior 		18	 A. Talking about Web site, they 	
19	manager, application maintenance for the		19	sit on a Web server. They allow you to	
20	Commercial Information Services and		20	access the Web site and to view the	
21	Solutions.		21	information on it.	
22	Q. And when did you enter that		22	Q. Do you have more than one	
23	position?		23	Web server? When I say you, I mean	
24	A. I began this role on January		24	AstraZeneca.	
	,				
	P	age 15			Page 17
1	1, 2006.		4	A V	
	1, 2000.		1	A. Yes.	
2	Q. And what does that involve?		2	Q. How many Web servers does	
2	Q. And what does that involve?			Q. How many Web servers does	
2 3	Q. And what does that involve?A. My role as the application		2	Q. How many Web servers does AstraZeneca have to your knowledge?	
2 3 4	Q. And what does that involve? A. My role as the application maintenance leader is to ensure the		2	Q. How many Web servers does AstraZeneca have to your knowledge? A. I don't have an exact	
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		Page 18			Page 20
1	Q. Is there a person who would	-	1	are contained on that server about the	J
2	have more knowledge about Web site		2		
	_			company?	
3	servers than you do for AstraZeneca?		3	A. Example, the HR site. I can	
4	 A. Yes. There probably would 		4	go in there and see information about our	
5	be.		5	policies in terms of HR, in terms of how	
6	Q. Who would be the person you		6	my vacation policy. I can see how	
7	would ask if you wanted to know more		7	much where the holidays are. I can go	
8	about the Web servers?		8	•	
1			_	in and see we have a performance	
9	A. The first person to ask		9	management process, I can see the	
10	would be Josh Bengal.		10	documents and all the things associated	
11	Q. Could you spell that,		11	with that and how to do the process.	
12	please?		12	Q. What other types of	
13	A. J-O-S-H, B-E-N-G-A-L.		13	information would be on what is the	
14	Q. Where does he work?		14	name of that server?	
15	-				
1	A. AstraZeneca.		15	A. I don't know the server	
16	Q. How about third parties or		16	name. It's the AstraZeneca home page.	
17	outside people who would work on the		17	Q. Close enough. On that	
18	be involved with the Web servers, what		18	AstraZeneca home page, which is an	
19	company or people would do that?		19	Intranet server, what other types of	1
20	A. We have our we have an		20	information besides HR information are on	
21	environment called EBI which posts our		21	that internal Web site?	
22	what we call external Web servers. They		22	A. The home page would have	
23	would have you know, be able to say				
1			23	information about the company. It would	
24	which one they're on.		24	have information about events. It would	
 					
l					
1	O Are all of your Web convers	Page 19	1	have information about you can	Page 21
1	Q. Are all of your Web servers	Page 19	1	have information about you can	Page 21
2	external?	Page 19	2	actually link to a page where you could	Page 21
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2	external?	Page 19	2	actually link to a page where you could	Page 21
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2 3 4 5 6	external? A. No, sir. Q. What internal Web servers do you have? A. We have what we call	Page 19	2 3 4 5 6	actually link to a page where you could buy stuff, people internal selling. You wanted to sell a car, I could actually put it there. You could go to different parts of the organization have	Page 21
2 3 4 5 6 7	external? A. No, sir. Q. What internal Web servers do you have? A. We have what we call Intranet sites. I don't know, like I	Page 19	2 3 4 5 6 7	actually link to a page where you could buy stuff, people internal selling. You wanted to sell a car, I could actually put it there. You could go to different parts of the organization have their own they link to that to be able	Page 21
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		-			
		Page 22			Page 24
1	 A. I know there's a tips page. 		1	please?	
2	If there is a person in the company, they		2	A. A-A-R-O-N-S-O-N, Aaronson.	
3	can go and get a tip on how to use e-mail		3	Q. Who authorizes what goes on	
4	or Word or something like that.		4	that server or when changes can be made	
5	Q. It would be like a help		5	to that server, would that be Mr.	
6	button?		6	Aaronson or somebody else?	
7	A. Yeah, basically. Very basic		7	A. I would look to Steve to	
8	help.		8	know that answer. I don't know,	
9	MR. TORREGROSSA: Mr.		9	Q. What about some of the	
10	Dowling, if you could wait until		10	external Web servers, can you tell me	
11	the question is over because		11	about the ones that you're familiar with?	
12	sometimes the reporter has trouble		12	A. We have brand servers. We	
13	taking both down at the same time.		13	have	
14	MR. SMITH: Thank you.		14	Q. When you say brand	
15	BY MR. SMITH:		15		
16	Q. So can various information				
17	•		16	sites.	
	systems be accessed through this home		17	Q. May I stop you there and ask	
18	page? Are they linked in some way?		18	you to tell me what you mean by a "brand	
19	A. No, they're not. I don't		19	site"?	
20	know of any system that links off of that		20	A. Sure. Product	
21	page.		21	AstraZeneca product site. We have a	
22	Q. I'm interrupting you. I		22	breast cancer site.	
23	apologize. It's just information on		23	Q. So the brand site for	
24	there about the information systems, is		24	AstraZeneca products would be all	
		D=== 22			D=== 25
1	that what you're saying, as opposed to	Page 23	1	products or is there a congrate site for	Page 25
2				products or is there a separate site for	
	having links to the systems themselves? A. Yes.		2	each product, for example, Seroquel?	
3			3	A. There are separate sites.	
4	Q. So you have HR information		4	Q. So there's a Seroquel brand	
5	and you have some tips and general		5	site?	
6	information about IS. Anything else on		6	A. Yes. I'm not sure of the	
7	that internal site? A company directory		7	title right off the top of my head.	
8	for example?		8	Q. And who would be responsible	
^	A. I can type in a person's		9	for who would be the manager for the	
9	· · · · · · · · · · · · · · · · · · ·				
10	name and get a phone number.		10	Seroquel brand site?	
10 11	name and get a phone number. Q. Any information about the		11	Seroquel brand site? A. Operationally I would. My	
10 11 12	name and get a phone number. Q. Any information about the drug products that are sold by		11 12	Seroquel brand site? A. Operationally I would. My organization.	
10 11 12 13	name and get a phone number. Q. Any information about the drug products that are sold by AstraZeneca?		11 12 13	Seroquel brand site? A. Operationally I would. My organization. Q. Can you describe that site	
10 11 12 13 14	name and get a phone number. Q. Any information about the drug products that are sold by AstraZeneca? A. There may be. This is from		11 12 13 14	Seroquel brand site? A. Operationally I would. My organization. Q. Can you describe that site for us and tell us what it contains?	
10 11 12 13 14 15	name and get a phone number. Q. Any information about the drug products that are sold by AstraZeneca? A. There may be. This is from my usage of it. I don't tend to surf		11 12 13 14 15	Seroquel brand site? A. Operationally I would. My organization. Q. Can you describe that site	
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1					
		Page 26			Page 28
1	MR. SMITH: I see it as		1	we maintain the site, we make sure the	
2	not to argue with that, but I see		2	server is running, the content is managed	
3	it as being related to IT in		3	by the business.	
4	general, and I don't know of		4	Q. Now, do you know anything	
5	anybody else who has been		5	about whether the content on that site is	
6	designated there and maybe that is		6	FDA approved or not?	
7	something we can talk about later,		7	MR. TORREGROSSA: Objection	
8	designating someone for that.		8	to form. You can answer. Again,	
9	BY MR. SMITH:		9	there are the sales folks that	
10	Q. I don't want to go into		10	deal with the product information	
11	great detail, but since you manage that,		11	and who know what you're talking	
12	let me ask you this. First of all, can		12	about, and there's the IT folks.	
13	· · · · · · · · · · · · · · · · · · ·		13	·	
14	you give me a general description of the			I just want to make sure you	
15	Seroquel brand site?		14	understand that.	
	A. I really can't.		15	MR. SMITH: Sure. I'll try	
16	Q. What is its purpose?		16	to keep it limited.	
17	MR. TORREGROSSA: Objection		17	THE WITNESS: Could you	
18	to form. You can answer.		18	repeat the question, please?	
19	THE WITNESS: I believe its		19	BY MR. SMITH:	
20	purpose is to it's an external		20	Q. Would marketing have the	
21	or Internet site to allow people		21	have input into that Seroquel Web site?	
22	to find out information about the		22	 A. As I said, they would manage 	
23	product.		23	the content.	
24	BY MR. SMITH:		24	Q. Your answer is better than	
		Dago 27			Page 20
1	O The server is an external	Page 27	1	my question	Page 29
1 2	Q. The server is an external server is that what you're saying?	Page 27	1 2	my question. Material or information that	Page 29
2	server, is that what you're saying?	Page 27	2	Material or information that	Page 29
2	server, is that what you're saying? A. It's an EBI environment	Page 27	2 3	Material or information that is posted on that Web site, after it's	Page 29
2 3 4	server, is that what you're saying? A. It's an EBI environment where our external servers are supported,	Page 27	2 3 4	Material or information that is posted on that Web site, after it's taken off the Web site, would it be	Page 29
2 3 4 5	server, is that what you're saying? A. It's an EBI environment where our external servers are supported, yes.	Page 27	2 3 4 5	Material or information that is posted on that Web site, after it's taken off the Web site, would it be where would it be maintained or archived	Page 29
2 3 4 5 6	server, is that what you're saying? A. It's an EBI environment where our external servers are supported, yes. Q. Is access available to	Page 27	2 3 4 5 6	Material or information that is posted on that Web site, after it's taken off the Web site, would it be where would it be maintained or archived or stored?	Page 29
2 3 4 5 6 7	server, is that what you're saying? A. It's an EBI environment where our external servers are supported, yes. Q. Is access available to anybody who is not an AstraZeneca	Page 27	2 3 4 5 6 7	Material or information that is posted on that Web site, after it's taken off the Web site, would it be where would it be maintained or archived or stored? A. Our Web sites in terms of	Page 29
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		Page 30			Page 32
1	current version or you could go versions		1	 A. They could access a 	
2	back.		2	prescription report. They could	
3	Q. You could output the whole	9	3	access some of these are no longer in	
4	thing if you wanted to, everything that		4	existence a Dashboard report. They	
5	had been on there?		5	could have accessed an FSIP or incentive	
6	A. It would be very		6	report of how their you know, their	
7	challenging. It's changed over a large		7	compensation.	
8	period of time and it's document by		8	Q. Can you describe Dashboard	
9	document.		9	for me?	
10	Q. We've outlined some		10		
11	databases that you work with, and we		11		
12	talked a little bit about applications			longer in existence, would have	
13			12	information about how they would have	
1	and we got into Web sites. What are some		13	made calls, their calls for the period of	
14	of the other applications that your work		14	time reported. They're I'm trying to	
15	entails that you supervise?		15	think, it's been a while. They may have	
16	A. I supervise the applications		16	descript information of the products,	
17	that would support sales. SalesInsite		17	detailing in summary for their business	
18	would be one. TimeTrax, Touchstone		18	area. I haven't looked at one of those	
19	Interactive, Touchstone Reporting to name		19	in several years. I'm trying to think.	
20	a few.		20	The product information, the call or	
21	Q. And what is SalesInsite?		21	execution data. That would be the ones	
22	 A. It would be the tool a 		22	that stand out in my mind. And the	
23	salesperson uses to manage the best		23	TimeTrax information, the time off	
24	description is it's somewhat like what is		24	territory.	
1					
		Page 31			Page 33
1	called a portal, an information site for	Page 31	1	Q. Is Dashboard a sales	Page 33
1 2	called a portal, an information site for the salesperson. They can view their	Page 31	2	automation tool?	Page 33
1 2 3	called a portal, an information site for the salesperson. They can view their e-mail. They can view messages. They	Page 31		_	Page 33
1 2 3 4	called a portal, an information site for the salesperson. They can view their e-mail. They can view messages. They can view access reports, access that	Page 31	2	automation tool?	Page 33
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1 2 3 4 5	called a portal, an information site for the salesperson. They can view their e-mail. They can view messages. They can view access reports, access that TimeTrax tool. Q. Access reports? A. Yes.	Page 31	2 3 4 5	automation tool? A. No, it was actually a report. The technology was called it was what you would call Web-based	Page 33
1 2 3 4 5 6	called a portal, an information site for the salesperson. They can view their e-mail. They can view messages. They can view access reports, access that TimeTrax tool. Q. Access reports?	Page 31	2 3 4 5 6	automation tool? A. No, it was actually a report. The technology was called it was what you would call Web-based technology.	Page 33
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		Page 34			Page 36
1	Q. And if you wanted to access		1	 A. The reports are limited in 	
2	the information what was the time		2	terms of what is available. They are	
3	period for Dashboard that it was in		3	based on like a three month or four month	
4			_		
	operation?		4	period, we may have a set of those	
5	A. I'm thinking. These are		5	reports. And I believe we have them	
6	approximate. Approximately January 2001		6	going to 2002. The what was the other	
7	until, I believe, February, March 2006.		7	part of the question?	
8	March, I believe.		8	Q. Was the data available and	
9	Q. Is there a system that		9	were the reports available?	
10	replaces Dashboard?			•	
1	·		10	A. The Compass data related to	
11	A. Touchstone Reporting.		11	the calls and the things that were	
12	Q. Is there a system that		12	reported would be available. The IMS	
13	preceded Dashboard?		13	data, I'm not sure where that would	
14	 A. I can't recall anything of 		14	come if it would be readily available	
15	that. It was something new when it was		15	today. IMS data is a rolling 24 months.	
16	first built.		16	We have the current information	
17	Q. Is data contained in the		17	available.	
18	Dashboard system available to be		18		
19				Q. IMS is a third-party vendor.	ŀ
1	retrieved?		19	Is that correct?	
20	MR. TORREGROSSA: Objection		20	A. Yes, it is.	
21	to form.		21	Q. IMS stands for what?	
22	BY MR. SMITH:		22	A. IMS. I'm sorry. Never even	
23	Q. Can you retrieve data in the		23	asked that question.	
24	Dashboard that was in the Dashboard		24	Q. Can you just tell us briefly	
-					
		Page 35			Page 37
1	system?	Page 35	1	what kind of information IMS provides to	Page 37
	•	Page 35	_	what kind of information IMS provides to AstraZeneca?	Page 37
2	A. The data would be in the	Page 35	2	AstraZeneca?	Page 37
2 3	A. The data would be in the format, yes, there are Dashboards, we do	Page 35	2	AstraZeneca? A. The information I know that	Page 37
2 3 4	A. The data would be in the format, yes, there are Dashboards, we do have some archives you know, we have	Page 35	2 3 4	AstraZeneca? A. The information I know that they provide is they provide early view	Page 37
2 3 4 5	A. The data would be in the format, yes, there are Dashboards, we do have some archives you know, we have them. And then if we didn't, the data	Page 35	2 3 4 5	AstraZeneca? A. The information I know that they provide is they provide early view which is weekly data related to	Page 37
2 3 4 5 6	A. The data would be in the format, yes, there are Dashboards, we do have some archives you know, we have them. And then if we didn't, the data would be available in like the Compass	Page 35	2 3 4 5 6	AstraZeneca? A. The information I know that they provide is they provide early view which is weekly data related to prescriptions. They provide exponent	Page 37
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1					
1	TimeTray The cynchronication to all that	Page 38	_	O W	Page 40
	TimeTrax. The synchronization tool that		1	Q. Who is the is there just	
2	allows the reps to synchronize. Those		2	one resource manager?	
3	are the bigger ones.		3	 A. For that area, it would be 	
4	Q. Let's take them in order.		4	one, yes.	
5	Why don't you talk to us about		5	Q. And who would that be?	
6	Touchstone. Tell us what Touchstone is.		6	A. Jayne Tomforde.	
7	 A. Touchstone is a sales force 		7	Q. So you could send a request	
8	automation tool. It's built on the		8	to Jayne Tomforde for data from the	
9	Siebel systems platform which is a bought		9	Compass database in prior to January 1	
10	product. Siebel system manages that type		10	of 2005 and she could produce that to	
11	of application and it allows the sales		11	you?	
12	reps, or PSSes as I refer to them, to		12	MR. TORREGROSSA: Objection	
13	record their information, their		13	to form,	
14	interactions with their accounts or their		14	THE WITNESS: She would not.	
15	customers.		15	She would assign a resource to do	
16	Q. What is a PSS?		16	it. And then have we have a	
17	A. Pharmaceutical sales		17		
18				resource pool of people who would	
19	specialist. Also known as a sales rep.		18	be able to do that.	
	Q. When did Touchstone start?		19	BY MR. SMITH:	
20	A. Touchstone began rolling out		20	Q. And do you have any	
21	in June of 2006.		21	information with the resource pool?	
22	Q. And how much of the prior		22	A. I know who they are. They	
23	data was migrated into Touchstone?		23	work for the responsibility for that	
24	 A. To start Touchstone, we 		24	resides with her in terms of managing	
		D 20			
		Page 39			Page 41
1	migrated and it was January 1, 2005	_	4	thouse and things like that. They would in	3
1	migrated and it was January 1, 2005.	_	1	them and things like that. They work in	
2	Q. And data from prior to		2	the same organization I work in.	
2 3	Q. And data from prior to January 1, 2005, was it archived in some		2	the same organization I work in. Q. Now, you are a manager with	
3 4	Q. And data from prior to January 1, 2005, was it archived in some way?		2 3 4	the same organization I work in. Q. Now, you are a manager with applications maintenance and Jayne is a	
2 3 4 5	Q. And data from prior to January 1, 2005, was it archived in some way? A. No. The data is in Compass.		2 3 4 5	the same organization I work in. Q. Now, you are a manager with applications maintenance and Jayne is a manager with resources?	-
2 3 4 5 6	Q. And data from prior to January 1, 2005, was it archived in some way? A. No. The data is in Compass. Q. And that data still exists		2 3 4 5 6	the same organization I work in. Q. Now, you are a manager with applications maintenance and Jayne is a manager with resources? A. Uh-huh.	
2 3 4 5 6 7	Q. And data from prior to January 1, 2005, was it archived in some way? A. No. The data is in Compass. Q. And that data still exists in Compass?		2 3 4 5 6 7	the same organization I work in. Q. Now, you are a manager with applications maintenance and Jayne is a manager with resources? A. Uh-huh. Q. If you could explain what	
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		Page 42			Page 44
1	she would not be assigning resources to.		1	He's here on an IT basis,	
2	Q. Have you been involved in		2	not a lawyer, what are we doing	
3	document production in this litigation?		3	for retention purposes for	
4	MR. TORREGROSSA: Objection		4	litigation basis. And any	
5	to form. You can answer that		5	involvement he has in working with	
6	question yes or no, but don't		6	legal counsel to produce	
7	reveal any substance of		7	information, I would deem that as	
8	attorney-client communications.		8	perfectly privileged.	
9	THE WITNESS: Yes.		9	MR. SMITH: Let me follow a	
10	BY MR. SMITH:		10	thought here and we'll take a	
11	Q. What is your role in		11	break in a minute. It's about	
12	producing documents pertaining to		12	time for a break.	
13	Seroquel?		13	BY MR. SMITH:	
14	MR. TORREGROSSA: Objection.		14	Q. I assume you're going to	
15	Do not reveal any attorney-client		15		
16	information. You can only answer			follow your counsel's advice and you're	
17	that question yes or no or what it		16 17	not going to tell me what your involvement is with document production	
18	is. Actually, he can't answer				
19	that question, Ken. He can't		18	in this case. Is that correct?	
20			19	A. Yes.	
21	describe what he does. That's		20	Q. Can you tell me whether you	
1	privileged.		21	have searched for data prior to	
22	MR. SMITH: You're directing		22	January 1, 2005 relating to sales force	
23	him not to answer?		23	automation?	
24	MR. TORREGROSSA: I'm		24	MR. TORREGROSSA: And I	
		Page 43			Page 45
1	the second of th	~			
	directing him not to answer that		1	caution you that you can answer	-
	directing him not to answer that question. As I told you, he's not		1 2	caution you that you can answer the guestion. Mr. Dowling, but in	-
2	question. As I told you, he's not		2	the question, Mr. Dowling, but in	-
2	question. As I told you, he's not here to talk about that today. If		2 3	the question, Mr. Dowling, but in doing so, do not reveal any legal	<u>-</u>
2 3 4	question. As I told you, he's not here to talk about that today. If you would like a 30(b)(6) on that,		2 3 4	the question, Mr. Dowling, but in doing so, do not reveal any legal requests or legal advice or legal	-
2 3 4 5	question. As I told you, he's not here to talk about that today. If you would like a 30(b)(6) on that, we'll consider it. But he's not		2 3 4 5	the question, Mr. Dowling, but in doing so, do not reveal any legal requests or legal advice or legal questions from the legal	-
2 3 4 5 6	question. As I told you, he's not here to talk about that today. If you would like a 30(b)(6) on that, we'll consider it. But he's not here to talk about the document		2 3 4 5 6	the question, Mr. Dowling, but in doing so, do not reveal any legal requests or legal advice or legal questions from the legal department. But you can answer	-
2 3 4 5 6 7	question. As I told you, he's not here to talk about that today. If you would like a 30(b)(6) on that, we'll consider it. But he's not here to talk about the document production		2 3 4 5 6 7	the question, Mr. Dowling, but in doing so, do not reveal any legal requests or legal advice or legal questions from the legal department. But you can answer for business purposes. Do you	
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		Page 46			Page 48
1	Q. How far back were you able		1	to form.	
2	to go looking for sales force automation		2	THE WITNESS: Yes, it is.	
3	data?		3	BY MR. SMITH:	
4	MR. TORREGROSSA: Same		4	Q. And can you tell us in	
5	instruction. Same caution.		5	why don't we take a break here.	
6	THE WITNESS: The database		6	MR. SHELLER: Before we do,	
7	contains the Compass database		7	I'm a little bit at a loss because	
8	contains information all the way		8	I just learned about this	
9	back to its inception, which is		9	deposition yesterday.	
10	1994. I don't remember the exact		10	Mr. Dowling is here, maybe	
11	date.		11	it's just an explanation, but Mr.	
12	BY MR. SMITH:		12	Dowling is here to discuss the	
13	Q. So if you wanted to		13	topic of IT/databases?	
14	Seroquel was marketed in September of		14	MR. TORREGROSSA: He's here	
15	1997, I believe. Does that accord with		15	to talk about AstraZeneca's past	
16	your recollection?		16	and current databases and computer	
17	A. September or October,		17	systems as modified by the	
18	something of that time frame, that fall.		18	30(b)(6) agreement between the	
19	Q. So for sales force		19	parties, yes.	
20	automation data, would there be anything		20	MR. SHELLER: Where I'm	
21	existing prior to the launch of Seroquel?		21	confused is, I'm not sure what	
22	MR. TORREGROSSA: Would		22	that is meant to encompass. You	
23	there be anything prior to		23	might be able to help me with	
24	BY MR. SMITH:		24	that.	
			د ۱	tilat.	
		Page 47			Page 49
1	Q. Would there be any sales		1	MR. TORREGROSSA: If you	
2	force automation data prior to the		2	want to do it on the record, we	
3	launch? I'm trying to ascertain what the		3	can do it on the record or I'd be	
4	sales force automation data is. Do you		4	happy to discuss off the record	
5	understand?		5	our negotiations.	
6	MR. TORREGROSSA: I don't		6	MR. SHELLER: I would like	
7	understand the question, but go		7	something on the record so we have	
8	ahead. Objection to form.		8	it when we review it.	
9	BY MR. SMITH:		9	MR. TORREGROSSA: There were	
10	Q. Do you understand, Mr.		10	extensive negotiations, Mr.	
11	Dowling?		11	Sheller. There were eleven	
12	A. My understanding of the		12	notices issued by MDL plaintiffs'	
13	question is, would there be data related		13	counsel on 262 different areas of	
14	to activities with physicians in the		14	30(b)(6) testimony. We found that	
15	sales force automation tool prior to		15	to be a bit ludicrous. So we	
16	launch?		16	engaged in extensive negotiations	
17	Q. Prior to launch.		17	over a week to try to narrow the	
18	A. My understanding, no, it		18	focus and come up with an	
19	would not have been a promoted product.		19	acceptable and agreeable 30(b)(6)	
20	Q. Now, data relating to sales		20	notice.	
120	O. HOW, GALA I CIAULIU LU SAICS				
121	· · · · · · · · · · · · · · · · · · ·		121	So what you see before us	
21	force automation is available then post		21	So what you see before us today is the result of all those	
22	force automation is available then post launch beginning in September or October		22	today is the result of all those	
22 23	force automation is available then post launch beginning in September or October of 1997. Is that correct?		22 23	today is the result of all those efforts, and so Mr. Dowling is to	
22	force automation is available then post launch beginning in September or October		22	today is the result of all those	

1		_		
1	Page 50			Page 52
1	of number 3 that we've identified	1	yes. I would be able to tell you there	-
2	as part of that agreement.	2	is a form they fill out and they send it	
3	MR. SMITH: Just before we	3	to I think it goes to CLINTRACE. The	
4	break is that good for you,	4	sales force fills out a form and then	
5	Steve?	5	that is sent to CLINTRACE and that's	
6	MR. SHELLER: Well, I'm	6	where I would not be able to go at that	
7	looking at you're talking about	7	point, speak of it.	
8	number 3 in the notice. Right?	8	Q. Still under that subject,	
9	MR. TORREGROSSA: I am			
10		9	"the activity of the Seroquel sales	
	talking about number 3 in Mr.	10	force, data and sales materials	
11	Magaziner's	11	distributed to the Seroquel sales	
12	MR. SHELLER: AstraZeneca's	12	force," again, that would be that	
13	past and present data including	13	would be your area, wouldn't it?	8
14	all backup, et cetera, paragraph	14	 A. I would be able to speak 	
15	3, numbered 3.	15	about the activities in the database and	
16	MR. TORREGROSSA: Correct.	16	the systems used some of the systems,	
17	MR. SMITH: Let me ask a	17	I believe, related to the sales materials	2
18	couple of questions and see if you	18	distribution.	
19	have any follow up, and then we'll	19	Q. So you're prepared to talk	
20	break as I promised.	20	today about systems related to, and I'll	
21	BY MR. SMITH:	21	read it again, "the activity of the	İ
22	Q. Mr. Dowling, would you look	22	Seroquel sales force, data and sales	
23	at Exhibit B to the Exhibit 1 which would	23	materials distributed to the Seroquel	\$ 5 5 8 8
24	be the letter from Mr. Magaziner,	24	sales force," right? You're prepared	
		- '	sales force, right: Toute prepared	
	Page 51			Page 53
1	Page 51 representing AstraZeneca, to Scott Allen,	1	to talk about that today. Right?	Page 53
1 2	representing AstraZeneca, to Scott Allen,	1	to talk about that today. Right? A. Yes.	Page 53
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2 3 4	representing AstraZeneca, to Scott Allen, representing the plaintiffs. And on page 3 of that letter, paragraph numbered 3, do you see that?	1 2 3 4	A. Yes. Q. And then going up above that, that includes backup and retention	Page 53
2 3 4 5	representing AstraZeneca, to Scott Allen, representing the plaintiffs. And on page 3 of that letter, paragraph numbered 3, do you see that? Would you just read that	1 2 3 4 5	A. Yes. Q. And then going up above that, that includes backup and retention systems and policies and procedures	Page 53
2 3 4 5 6	representing AstraZeneca, to Scott Allen, representing the plaintiffs. And on page 3 of that letter, paragraph numbered 3, do you see that? Would you just read that paragraph I'll just read it in. It	1 2 3 4 5 6	A. Yes. Q. And then going up above that, that includes backup and retention systems and policies and procedures relating to the activities of the sales	Page 53
2 3 4 5 6 7	representing AstraZeneca, to Scott Allen, representing the plaintiffs. And on page 3 of that letter, paragraph numbered 3, do you see that? Would you just read that paragraph I'll just read it in. It says, "AstraZeneca's past and current	1 2 3 4 5 6 7	A. Yes. Q. And then going up above that, that includes backup and retention systems and policies and procedures relating to the activities of the sales force? You would be able to talk about	Page 53
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		T		
1	Page 5 here.	1	MR. SHELLER: Before we do,	Page 56
2	MR. TORREGROSSA: That's a	2	can I clarify one thing? As an	
3	perfectly fine question.	3	•	
4	MR. SHELLER: Steve, if you	4	example, if a sales rep is out in the field and visits a doctor or	
5	the state of the s			
6	could ask that one thing. It says	5	somebody and writes a call note,	
7	something about data from clinical	6	is that something you're able to	
	and preclinical studies, is Mr.	7	talk about or is that someone	
8	Dowling here to talk about that?	8	else?	
9	MR. TORREGROSSA: The answer	9	MR. TORREGROSSA: Don't	
10	is no. Mr. Draper is here, going	10	answer that. Yes, he is able to	
11	to testify on the 17th and 18th,	11	answer that. The sales call	
12	and he will address clinical and	12	automation system we will be able	
13	preclinical data and the systems	13	to discuss today.	
14	used for that.	14	MR. SHELLER: Call notes and	
15	MR. SHELLER: And systems	15	visits to doctors, he's able to	
16	used for that.	16	talk about that?	
17	BY MR. SMITH:	17	MR. TORREGROSSA: From an IT	
18	Q. Lastly, Mr. Dowling, we're	18	standpoint, yes.	
19	going to talk about, "(b) the location,	19	MR. SHELLER: I just want to	
20	function, and design of computer systems,	20	be sure.	
21	databases, software, e-mail systems,"	21	MR. SMITH: Let's take a	
22	which we've already talked about some,	22	break.	
23	"internet or intranet	23	break.	
24	applications," which we've already	24	(A recess was taken from	
			(A recess was taken non	
	Page 5	5		Page 57
1	talked about some, "mainframes,	1	10:37 a.m. to 10:57 a.m.)	
2	computers, local area network and wide	2		
3	area network servers, desktop, laptop,	3	BY MR. SMITH:	
4	phone and voicemail, and other messaging	4	Q. We're back on the record.	
5	systems used by AstraZeneca from the time	5	Mr. Dowling, talk to me	
6	Seroquel was first developed until the	6	about Touchstone, if you will. That's	
7	present."	7	one of the applications that you manage.	
8	We're going to be able to	8	Is that correct?	
9	talk about those today. Right?	9	A. Yes.	
10	A. Yes. Except for I would	10	Q. What is Touchstone?	
11	not be as familiar with the phone and	11	A. It's a sales force	
12	voice mail.	12	automation tool that allows the sales	
13	MR. TORREGROSSA: That's Mr.	13	reps to enter information about their	
14	Draper. So you're correct.	14	discussions with their customers,	
15	BY MR. SMITH:	15	doctors.	
16	Q. I didn't quite hear the	16	Q. So that's what they can put	
17	·	17	into Touchstone. Right?	
11/	answer.	18	A. Yes.	
l .		1 10		
18	A. I would not be quite	110	O Mant can thou got out of	
18 19	familiar with the phone and voice mail	19	Q. What can they get out of	
18 19 20	familiar with the phone and voice mail systems.	20	Touchstone?	
18 19 20 21	familiar with the phone and voice mail systems. Q. That would be Mr. Draper?	20 21	Touchstone? MR. TORREGROSSA: The sales	
18 19 20 21 22	familiar with the phone and voice mail systems. Q. That would be Mr. Draper? A. Yes.	20 21 22	Touchstone? MR. TORREGROSSA: The sales reps?	
18 19 20 21	familiar with the phone and voice mail systems. Q. That would be Mr. Draper?	20 21	Touchstone? MR. TORREGROSSA: The sales	

1					
		Page 58			Page 60
1	THE WITNESS: They have the		1	have to have an account. There is a	
2	profile information on the doctor,		2	limited number of accounts. And also	
3	address type of information. The		3	licenses. It's a licensed product from	
4	products well, actually that's		4	Siebel. The general customer is the	
5	entered. The doctors who they		5	pharmaceutical sales specialist. The	
6	target to do sales against. Let's		6	district sales managers, their regional	
7	see. And like affiliations to,		7	sales director and some headquarters	
8	say, an account, meaning a doctor		8	people.	
9	could be affiliated to a hospital		9	•	
10	•		-	Q. You said the general	
11	or a group practice type stuff. BY MR. SMITH:		10	customer is the pharmaceutical sales	
			11	specialist. Is that the owner as far as	
12	Q. Besides the sales reps'		12	AstraZeneca is concerned? Is that the	
13	input, which is, I believe you said,		13	department that the bills are charged to?	
14	information they got after a sales visit,		14	 A. I don't understand what you 	
15	sales call, besides the sales reps, who		15	mean.	
16	else would input information into the		16	Q. What do you mean when you	
17	Touchstone system?		17	say the general customer is the	
18	 A. Touchstone is used by the 		18	pharmaceutical sales specialist?	
19	sales reps, and the account directors		19	A. That's the number one	
20	would also be able to use the system.		20	customer using the system.	
21	Q. And how would the account		21	Q. Who is able to request or	
22	directors use the system?		22	make changes to the system?	
23	A. The account directors deal		23	A. The sales reps can enter	
24	with the accounts they manage for like		24	data. Help me understand your question.	
- '	mar are accounted they manage for the		_ '	data. Telp me anderstand your question.	
		Page 59			Page 61
1	HMO type accounts and things of that	Page 59	1	O. Is there somebody at	Page 61
1 2	HMO type accounts and things of that nature. So there's similar interactions	Page 59	1 2	Q. Is there somebody at	Page 61
2	nature. So there's similar interactions	Page 59	2	AstraZeneca who could say, well, I need	Page 61
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2 3 4	nature. So there's similar interactions they may have. Q. Anybody else who would be	Page 59	2 3 4	AstraZeneca who could say, well, I need to do something else, and ask that it be modified?	Page 61
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	nature. So there's similar interactions they may have. Q. Anybody else who would be able to input information into Touchstone? A. If you you could enter a sales manager could enter it, a district sales manager, PSS' boss, could enter information. Q. Does the IMS information go into Touchstone? A. There is the ability to see a limited amount of data around IMS, yes. Q. What types of information from IMS? A. The prescription data. Q. Who can access Touchstone and to extract information? A. Can you explain from the Q. Who has permission to go	Page 59	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	AstraZeneca who could say, well, I need to do something else, and ask that it be modified? MR. TORREGROSSA: Objection to form. THE WITNESS: The business makes decisions on what they could do with the system. BY MR. SMITH: Q. Who in the business would have the ultimate responsibility for Touchstone? A. Howard Kaplan. Q. What is his title? A. I don't know his exact title. He's director and he would be covering that area. I can't recall his exact title. Q. Can you give me your best approximation of his title or describe	Page 61

1					
		Page 62			Page 64
1	relationship management.		1	question.	
2	Q. Is there an area, a division		2	Q. Is information put in or	
3	or a department that CRM comes under?		3	taken out through any other systems?	
4	A. It's in the Commercial		4	A. Yes.	
5	organization. I don't know the title of		5	Q. What other systems?	
6	the exact area.		6	A. There's sampling, a sampling	
7	Q. If he wanted a change to the		7	system. The sales rep signs a sample,	
8	system, who would he work with to		8	that information goes to the sampling	
9	accomplish that?		9	accountability system.	
10	MR. TORREGROSSA: Objection		10	Q. Is there a name for the	
11	to form.		11	sampling system?	
12	THE WITNESS: He would work		12	A. I call it the sampling	
13	with the client partner in the		13	accountability system.	
14	CISS organization to understand		14	Q. Is that a system that,	
15	what he needs he wants done.		15	again, you're responsible for?	
16	BY MR. SMITH:		16	A. No, sir.	
17	Q. And what is CISS?		17	Q. No, sir?	
18	A. Commercial Information		18	A. No, sir.	
19	Services and Solutions.		19	Q. Who is responsible for that?	
20	Q. And are you a part of CISS?		20	 A. The person I would say would 	
21	A. Yes, I am.		21	be David Wolfe.	
22	Q. Would he come to you if he		22	Q. And that's on the IT side?	
23	wanted changes or somebody else?		23	A. Yes.	
24	MR. TORREGROSSA: Do you		24	Q. Somebody else in CISS?	
-					
		Page 63			Page 65
1	mean changes to the overall system	Page 63	1	A. No. sir.	Page 65
1 2	mean changes to the overall system and how it works?	Page 63	1 2	A. No, sir. O. What division is he in?	Page 65
2	and how it works?	Page 63	2	Q. What division is he in?	Page 65
2	and how it works? MR. SMITH: Yes.	Page 63	2 3	Q. What division is he in?A. OAFS.	Page 65
2 3 4	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead.	Page 63	2 3 4	Q. What division is he in?A. OAFS.Q. What is that?	Page 65
2 3 4 5	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead. THE WITNESS: He would go to	Page 63	2 3 4 5	Q. What division is he in?A. OAFS.Q. What is that?A. Operations and Finance	Page 65
2 3 4 5 6	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead. THE WITNESS: He would go to the client partner.	Page 63	2 3 4 5 6	Q. What division is he in?A. OAFS.Q. What is that?A. Operations and FinanceSolutions.	Page 65
2 3 4 5 6 7	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead. THE WITNESS: He would go to the client partner. BY MR. SMITH:	Page 63	2 3 4 5 6 7	 Q. What division is he in? A. OAFS. Q. What is that? A. Operations and Finance Solutions. Q. With a system like 	Page 65
2 3 4 5 6	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead. THE WITNESS: He would go to the client partner. BY MR. SMITH: Q. And who is the client	Page 63	2 3 4 5 6	 Q. What division is he in? A. OAFS. Q. What is that? A. Operations and Finance Solutions. Q. With a system like Touchstone, is there something called a 	Page 65
2 3 4 5 6 7 8 9	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead. THE WITNESS: He would go to the client partner. BY MR. SMITH: Q. And who is the client partner?	Page 63	2 3 4 5 6 7 8	Q. What division is he in? A. OAFS. Q. What is that? A. Operations and Finance Solutions. Q. With a system like Touchstone, is there something called a data map?	Page 65
2 3 4 5 6 7 8 9	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead. THE WITNESS: He would go to the client partner. BY MR. SMITH: Q. And who is the client partner? A. Ed Seidl.	Page 63	2 3 4 5 6 7 8 9	Q. What division is he in? A. OAFS. Q. What is that? A. Operations and Finance Solutions. Q. With a system like Touchstone, is there something called a data map? A. A data map I would refer to	Page 65
2 3 4 5 6 7 8 9 10	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead. THE WITNESS: He would go to the client partner. BY MR. SMITH: Q. And who is the client partner? A. Ed Seidl. Q. Could you spell that,	Page 63	2 3 4 5 6 7 8 9 10	Q. What division is he in? A. OAFS. Q. What is that? A. Operations and Finance Solutions. Q. With a system like Touchstone, is there something called a data map? A. A data map I would refer to as an ERD, Entity Relationship Diagram.	Page 65
2 3 4 5 6 7 8 9 10 11	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead. THE WITNESS: He would go to the client partner. BY MR. SMITH: Q. And who is the client partner? A. Ed Seidl. Q. Could you spell that, please?	Page 63	2 3 4 5 6 7 8 9 10 11	Q. What division is he in? A. OAFS. Q. What is that? A. Operations and Finance Solutions. Q. With a system like Touchstone, is there something called a data map? A. A data map I would refer to as an ERD, Entity Relationship Diagram. Q. The E is entity?	Page 65
2 3 4 5 6 7 8 9 10 11 12 13	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead. THE WITNESS: He would go to the client partner. BY MR. SMITH: Q. And who is the client partner? A. Ed Seidl. Q. Could you spell that, please? A. S-E-I-D-L.	Page 63	2 3 4 5 6 7 8 9 10 11 12 13	Q. What division is he in? A. OAFS. Q. What is that? A. Operations and Finance Solutions. Q. With a system like Touchstone, is there something called a data map? A. A data map I would refer to as an ERD, Entity Relationship Diagram. Q. The E is entity? A. ERD.	Page 65
2 3 4 5 6 7 8 9 10 11 12 13 14	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead. THE WITNESS: He would go to the client partner. BY MR. SMITH: Q. And who is the client partner? A. Ed Seidl. Q. Could you spell that, please? A. S-E-I-D-L. Q. Are the costs of Touchstone	Page 63	2 3 4 5 6 7 8 9 10 11 12 13 14	Q. What division is he in? A. OAFS. Q. What is that? A. Operations and Finance Solutions. Q. With a system like Touchstone, is there something called a data map? A. A data map I would refer to as an ERD, Entity Relationship Diagram. Q. The E is entity?	Page 65
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead. THE WITNESS: He would go to the client partner. BY MR. SMITH: Q. And who is the client partner? A. Ed Seidl. Q. Could you spell that, please? A. S-E-I-D-L. Q. Are the costs of Touchstone charged to some department or division in AstraZeneca? A. Yes. Q. And to which division or department are they charged to?	Page 63	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. What division is he in? A. OAFS. Q. What is that? A. Operations and Finance Solutions. Q. With a system like Touchstone, is there something called a data map? A. A data map I would refer to as an ERD, Entity Relationship Diagram. Q. The E is entity? A. ERD. Q. ERD, and what does the E stand for? A. Entity Relationship Diagram. Q. Does such a thing exist for Touchstone? A. Yes.	Page 65
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead. THE WITNESS: He would go to the client partner. BY MR. SMITH: Q. And who is the client partner? A. Ed Seidl. Q. Could you spell that, please? A. S-E-I-D-L. Q. Are the costs of Touchstone charged to some department or division in AstraZeneca? A. Yes. Q. And to which division or department are they charged to? A. My organization. CISS. Q. Are there links between	Page 63	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. What division is he in? A. OAFS. Q. What is that? A. Operations and Finance Solutions. Q. With a system like Touchstone, is there something called a data map? A. A data map I would refer to as an ERD, Entity Relationship Diagram. Q. The E is entity? A. ERD. Q. ERD, and what does the E stand for? A. Entity Relationship Diagram. Q. Does such a thing exist for Touchstone? A. Yes. Q. Does it exist for all of the databases that you're going to talk about	Page 65
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead. THE WITNESS: He would go to the client partner. BY MR. SMITH: Q. And who is the client partner? A. Ed Seidl. Q. Could you spell that, please? A. S-E-I-D-L. Q. Are the costs of Touchstone charged to some department or division in AstraZeneca? A. Yes. Q. And to which division or department are they charged to? A. My organization. CISS.	Page 63	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. What division is he in? A. OAFS. Q. What is that? A. Operations and Finance Solutions. Q. With a system like Touchstone, is there something called a data map? A. A data map I would refer to as an ERD, Entity Relationship Diagram. Q. The E is entity? A. ERD. Q. ERD, and what does the E stand for? A. Entity Relationship Diagram. Q. Does such a thing exist for Touchstone? A. Yes. Q. Does it exist for all of the	Page 65
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	and how it works? MR. SMITH: Yes. MR. TORREGROSSA: Go ahead. THE WITNESS: He would go to the client partner. BY MR. SMITH: Q. And who is the client partner? A. Ed Seidl. Q. Could you spell that, please? A. S-E-I-D-L. Q. Are the costs of Touchstone charged to some department or division in AstraZeneca? A. Yes. Q. And to which division or department are they charged to? A. My organization. CISS. Q. Are there links between Touchstone and other applications or	Page 63	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. What division is he in? A. OAFS. Q. What is that? A. Operations and Finance Solutions. Q. With a system like Touchstone, is there something called a data map? A. A data map I would refer to as an ERD, Entity Relationship Diagram. Q. The E is entity? A. ERD. Q. ERD, and what does the E stand for? A. Entity Relationship Diagram. Q. Does such a thing exist for Touchstone? A. Yes. Q. Does it exist for all of the databases that you're going to talk about today?	Page 65

1	Q. Could you sketch a data map	Page 66	1	we're discussing today.	Page 68
2	for me for Touchstone?		2	BY MR. SMITH:	
3	A. No, sir.		3	Q. So other than your counsel,	
4	•		4	you met with colleagues, meaning other	
•	Q. Can you tell me we talked a little bit about the inputs and the		5	people who work at AstraZeneca?	
5	•		6	· ·	
6	outputs. Sampling is able to extract or		7	A. Yes, sir.	
7	access certain information in Touchstone,		8	Q. Who did you meet with?A. Lynn Winkler. Jason Holler.	
8	is that what you said?			•	
9	A. No, it's not.		9	Joe Keane. Steve Dupre. Mike Marcus.	
10	Q. It's not.		10	Sindy Schneck.	
11	A. That's not what I said.		11	Q. Would you spell that for me,	
12	Q. What is the relationship		12	please?	
13	between I don't want to misstate what		13	A. S-C-H-N-E-C-K.	
14	you said. What is the relationship		14	Chris Doyle. Eugene Tayam.	
15	between sampling and Touchstone?		15	Scott Morgan.	
16	A. A sales rep leaves samples		16	Q. Could you spell Tayam for	
17	with a doctor and they sign for the		17	me?	
18	samples, the order that was sent to them.		18	A. T-A-Y-A-M.	
19	And that information is sent to the		19	Q. Anyone else?	
20	sample accountability database.		20	A. Scott Morgan. Scott Brown.	
21	Q. Besides the sample		21	Holly Branham. Alex Manganella.	
22	accountability database, what other		22	Q. Could you spell Holly's name	
23	systems can access Touchstone?		23	for me?	
24	A. You have the a PIR allows		24	A. B-R-A-N-H-A-M, I believe.	
			<u> </u>		
		Page 67			Page 69
1	you the ability to enter a Professional	Page 67	1	O. Alex?	Page 69
1 2	you the ability to enter a Professional	Page 67	1 2	Q. Alex? A. Alex Manganella.	Page 69
2	Information Request, or a physician's,	Page 67	2	A. Alex Manganella.	Page 69
2 3	Information Request, or a physician's, and that is sent to, I believe, the	Page 67	2 3	A. Alex Manganella. Q. Take a stab at that for me.	Page 69
2 3 4	Information Request, or a physician's, and that is sent to, I believe, the Webster system.	Page 67	2 3 4	A. Alex Manganella. Q. Take a stab at that for me. A. Exactly. M-A-N-G-A-N-E-L-L-A.	Page 69
2 3 4 5	Information Request, or a physician's, and that is sent to, I believe, the Webster system. Q. Webster?	Page 67	2 3 4 5	A. Alex Manganella. Q. Take a stab at that for me. A. Exactly. M-A-N-G-A-N-E-L-L-A. That's phonetic.	Page 69
2 3 4 5 6	Information Request, or a physician's, and that is sent to, I believe, the Webster system. Q. Webster? A. Yes.	Page 67	2 3 4 5 6	A. Alex Manganella. Q. Take a stab at that for me. A. Exactly. M-A-N-G-A-N-E-L-L-A. That's phonetic. Q. Who is Mr. or Ms. Winkler?	Page 69
2 3 4 5 6 7	Information Request, or a physician's, and that is sent to, I believe, the Webster system. Q. Webster? A. Yes. Q. What is the Webster system?	Page 67	2 3 4 5 6 7	A. Alex Manganella. Q. Take a stab at that for me. A. Exactly. M-A-N-G-A-N-E-L-L-A. That's phonetic. Q. Who is Mr. or Ms. Winkler? MR. TORREGROSSA: Ms.	Page 69
2 3 4 5 6 7 8	Information Request, or a physician's, and that is sent to, I believe, the Webster system. Q. Webster? A. Yes. Q. What is the Webster system? A. I'm not familiar with that.	Page 67	2 3 4 5 6 7 8	A. Alex Manganella. Q. Take a stab at that for me. A. Exactly. M-A-N-G-A-N-E-L-L-A. That's phonetic. Q. Who is Mr. or Ms. Winkler? MR. TORREGROSSA: Ms. THE WITNESS: Ms.	Page 69
2 3 4 5 6 7 8 9	Information Request, or a physician's, and that is sent to, I believe, the Webster system. Q. Webster? A. Yes. Q. What is the Webster system? A. I'm not familiar with that. I know we send the PIRs to them to	Page 67	2 3 4 5 6 7 8 9	A. Alex Manganella. Q. Take a stab at that for me. A. Exactly. M-A-N-G-A-N-E-L-L-A. That's phonetic. Q. Who is Mr. or Ms. Winkler? MR. TORREGROSSA: Ms. THE WITNESS: Ms. BY MR. SMITH:	Page 69
2 3 4 5 6 7 8 9	Information Request, or a physician's, and that is sent to, I believe, the Webster system. Q. Webster? A. Yes. Q. What is the Webster system? A. I'm not familiar with that. I know we send the PIRs to them to manage.	Page 67	2 3 4 5 6 7 8 9	A. Alex Manganella. Q. Take a stab at that for me. A. Exactly. M-A-N-G-A-N-E-L-L-A. That's phonetic. Q. Who is Mr. or Ms. Winkler? MR. TORREGROSSA: Ms. THE WITNESS: Ms. BY MR. SMITH: Q. Ms.	Page 69
2 3 4 5 6 7 8 9 10	Information Request, or a physician's, and that is sent to, I believe, the Webster system. Q. Webster? A. Yes. Q. What is the Webster system? A. I'm not familiar with that. I know we send the PIRs to them to manage. Q. Who would be knowledgeable	Page 67	2 3 4 5 6 7 8 9 10	A. Alex Manganella. Q. Take a stab at that for me. A. Exactly. M-A-N-G-A-N-E-L-L-A. That's phonetic. Q. Who is Mr. or Ms. Winkler? MR. TORREGROSSA: Ms. THE WITNESS: Ms. BY MR. SMITH: Q. Ms. A. She manages in the systems	Page 69
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10 Q. ICON? 10 certain groups within your group, are 11 A. Holly. 11 there subgroups?	
11 A. Holly. 11 there subgroups?	
12 O. SnapPharma? 12 MR. TORREGROSSA: You're	
14 Q. AZER? 14 MR. SMITH: Yes, about the	
15 A. Steve Dupre. 15 employees that are in his group, I	
16 Q. PREP? 16 want to ask if there are subgroups	
17 A. Nancy Jarret. 17 of those employees?	
18 Q. And Northstar? 18 THE WITNESS: Help me	
19 A. Mike and Sindy. 19 understand "subgroups."	
20 Q. What documents have you 20 BY MR. SMITH:	
21 reviewed in preparation for today's 21 Q. If it's broken up into four	
22 deposition? 22 or five different functions and you have	
23 A. I have not reviewed 23 separate groups that do those functions	
24 documents for today. 24 or jobs. Does that help?	

					l
_		Page 74	_		Page 76
1	A. Yes. I have my employees		1	Q. I'm looking under senior	
2	are application service managers. And I		2	manager, application maintenance, it says	
3	have a service her title is service		3	you manage a team of four employees and	
4	management analyst. Application service		4	32 contractors. Where are the	
5	managers that cover different sets of		5	contractors from?	
6	applications.		6	A. The contractors are part of	
7	Q. How do the management		7	the group called Accenture.	
8	analysts differ from the application		8	Q. And what do the contractors	
9	service managers?		9	do?	
10	A. A service management		10		
	3				
11	analyst, which is new to my group,		11	applications like Touchstone.	
12	basically helps to manage the managers		12	Operational care and feeding. And the	
13	associated with making sure the		13	help desk.	
14	applications are running. In other		14	 Q. Who supplies those people to 	
15	words, service level agreements to make		15	you?	
16	sure that they're being met.		16	A. Accenture.	
17	Q. Is that in some way dealing		17	Q. Accenture? And where are	
18	with, for lack of a better term, the		18	they based?	
19	customers within AstraZeneca to see		19	A. They have an office in	
20	whether it's meeting their needs or not?		20	Wilmington. I don't know their corporate	
21	A. The work she does is for the		21	location.	
22	leadership within our organization.		22	Q. Do they basically sell and	
23	Q. She does work for the		23	service the Siebel system as a vendor?	
24	leadership?		24	A. No.	
12'	icadership:		- '	Α, 140,	
		Page 75			Page 77
1	A Yes	Page 75	1	O You get that directly from	Page 77
1 2	A. Yes.	Page 75	1 2	Q. You get that directly from Siebel, the Touchstone?	Page 77
2	Q. In which organization?	Page 75	2	Siebel, the Touchstone?	Page 77
2 3	Q. In which organization?A. CISS.	Page 75	2	Siebel, the Touchstone? A. Yes. We buy the licensing	Page 77
2 3 4	Q. In which organization?A. CISS.Q. What sorts of things are	Page 75	2 3 4	Siebel, the Touchstone? A. Yes. We buy the licensing directly from Siebel.	Page 77
2 3 4 5	Q. In which organization?A. CISS.Q. What sorts of things arethey measuring? How are they what are	Page 75	2 3 4 5	Siebel, the Touchstone? A. Yes. We buy the licensing directly from Siebel. Q. Your previous position was	Page 77
2 3 4 5 6	Q. In which organization? A. CISS. Q. What sorts of things are they measuring? How are they what are they measuring?	Page 75	2 3 4 5 6	Siebel, the Touchstone? A. Yes. We buy the licensing directly from Siebel. Q. Your previous position was manager, applications and operations?	Page 77
2 3 4 5 6 7	Q. In which organization? A. CISS. Q. What sorts of things are they measuring? How are they what are they measuring? A. Examples would be system up	Page 75	2 3 4 5 6 7	Siebel, the Touchstone? A. Yes. We buy the licensing directly from Siebel. Q. Your previous position was manager, applications and operations? A. Yes.	Page 77
2 3 4 5 6 7 8	Q. In which organization? A. CISS. Q. What sorts of things are they measuring? How are they what are they measuring? A. Examples would be system up time. How many calls to the help desk.	Page 75	2 3 4 5 6 7 8	Siebel, the Touchstone? A. Yes. We buy the licensing directly from Siebel. Q. Your previous position was manager, applications and operations? A. Yes. Q. And how was that different	Page 77
2 3 4 5 6 7 8 9	Q. In which organization? A. CISS. Q. What sorts of things are they measuring? How are they what are they measuring? A. Examples would be system up	Page 75	2 3 4 5 6 7	Siebel, the Touchstone? A. Yes. We buy the licensing directly from Siebel. Q. Your previous position was manager, applications and operations? A. Yes. Q. And how was that different from what you do now?	Page 77
2 3 4 5 6 7 8	Q. In which organization? A. CISS. Q. What sorts of things are they measuring? How are they what are they measuring? A. Examples would be system up time. How many calls to the help desk.	Page 75	2 3 4 5 6 7 8	Siebel, the Touchstone? A. Yes. We buy the licensing directly from Siebel. Q. Your previous position was manager, applications and operations? A. Yes. Q. And how was that different	Page 77
2 3 4 5 6 7 8 9	Q. In which organization? A. CISS. Q. What sorts of things are they measuring? How are they what are they measuring? A. Examples would be system up time. How many calls to the help desk. MR. SMITH: Why don't we	Page 75	2 3 4 5 6 7 8 9	Siebel, the Touchstone? A. Yes. We buy the licensing directly from Siebel. Q. Your previous position was manager, applications and operations? A. Yes. Q. And how was that different from what you do now?	Page 77
2 3 4 5 6 7 8 9 10	Q. In which organization? A. CISS. Q. What sorts of things are they measuring? How are they what are they measuring? A. Examples would be system up time. How many calls to the help desk. MR. SMITH: Why don't we mark this as Exhibit 2. I'm going	Page 75	2 3 4 5 6 7 8 9	Siebel, the Touchstone? A. Yes. We buy the licensing directly from Siebel. Q. Your previous position was manager, applications and operations? A. Yes. Q. And how was that different from what you do now? A. I had less responsibility.	Page 77
2 3 4 5 6 7 8 9 10 11 12	Q. In which organization? A. CISS. Q. What sorts of things are they measuring? How are they what are they measuring? A. Examples would be system up time. How many calls to the help desk. MR. SMITH: Why don't we mark this as Exhibit 2. I'm going to show you your resume, Mr.	Page 75	2 3 4 5 6 7 8 9 10 11	Siebel, the Touchstone? A. Yes. We buy the licensing directly from Siebel. Q. Your previous position was manager, applications and operations? A. Yes. Q. And how was that different from what you do now? A. I had less responsibility. Q. What additional responsibility did you have as senior	Page 77
2 3 4 5 6 7 8 9 10 11 12 13	Q. In which organization? A. CISS. Q. What sorts of things are they measuring? How are they what are they measuring? A. Examples would be system up time. How many calls to the help desk. MR. SMITH: Why don't we mark this as Exhibit 2. I'm going to show you your resume, Mr. Dowling.	Page 75	2 3 4 5 6 7 8 9 10 11 12 13	Siebel, the Touchstone? A. Yes. We buy the licensing directly from Siebel. Q. Your previous position was manager, applications and operations? A. Yes. Q. And how was that different from what you do now? A. I had less responsibility. Q. What additional responsibility did you have as senior manager, application maintenance?	Page 77
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. In which organization? A. CISS. Q. What sorts of things are they measuring? How are they what are they measuring? A. Examples would be system up time. How many calls to the help desk. MR. SMITH: Why don't we mark this as Exhibit 2. I'm going to show you your resume, Mr. Dowling. (Exhibit Dowling-2, Resume,	Page 75	2 3 4 5 6 7 8 9 10 11 12 13 14	Siebel, the Touchstone? A. Yes. We buy the licensing directly from Siebel. Q. Your previous position was manager, applications and operations? A. Yes. Q. And how was that different from what you do now? A. I had less responsibility. Q. What additional responsibility did you have as senior manager, application maintenance? A. I maintain I am	Page 77
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. In which organization? A. CISS. Q. What sorts of things are they measuring? How are they what are they measuring? A. Examples would be system up time. How many calls to the help desk. MR. SMITH: Why don't we mark this as Exhibit 2. I'm going to show you your resume, Mr. Dowling.	Page 75	2 3 4 5 6 7 8 9 10 11 12 13 14 15	Siebel, the Touchstone? A. Yes. We buy the licensing directly from Siebel. Q. Your previous position was manager, applications and operations? A. Yes. Q. And how was that different from what you do now? A. I had less responsibility. Q. What additional responsibility did you have as senior manager, application maintenance? A. I maintain I am responsible for all the applications. In	Page 77
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. In which organization? A. CISS. Q. What sorts of things are they measuring? How are they what are they measuring? A. Examples would be system up time. How many calls to the help desk. MR. SMITH: Why don't we mark this as Exhibit 2. I'm going to show you your resume, Mr. Dowling. (Exhibit Dowling-2, Resume, was marked for identification.)	Page 75	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Siebel, the Touchstone? A. Yes. We buy the licensing directly from Siebel. Q. Your previous position was manager, applications and operations? A. Yes. Q. And how was that different from what you do now? A. I had less responsibility. Q. What additional responsibility did you have as senior manager, application maintenance? A. I maintain I am responsible for all the applications. In the previous role I didn't have as many.	Page 77
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1 assume you provide services for other 2 drug products? Do you provide 3 informational services relating to drug 4 products other than Seroquel? 5 A. I'm not sure of the 6 question. 7 Q. Does your work involve just 8 Seroquel or does it involve all the drug 9 products that AstraZeneca makes? 10 A. The systems I manage support 11 AstraZeneca's products, yes. 12 Q. And products other than 13 Seroquel? 14 A. Yes. 15 Q. About how much of your time 16 is involved with Seroquel? 17 A. I don't look at my time as 18 involved with Seroquel as managing the 19 systems. 20 Q. Is the Touchstone system 21 used for products other than Seroquel? 21 as well? 3 A. Yes. 4 Q. And Northstar? 5 A. Yes. 9 promoted by the sales force. 10 Q. And NICE? 11 A. No. Not used by the sales force. 12 force. 13 Q. Is it used for product other than Seroquel? 14 A. Yes. 15 Q. About how much of your time 16 is involved with Seroquel as managing the 17 used for products other than Seroquel? 18 A. Yes. 19 Q. KNOWBOL? 20 A. Yes. 21 used for products other than Seroquel? 22 A. Yes. 23 Q. Which of the applications 20 Q. SnapPharma?	Compass oduct e sales cts em, is that
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11 AstraZeneca's products, yes. 12 Q. And products other than 13 Seroquel? 14 A. Yes. 15 Q. About how much of your time 16 is involved with Seroquel? 17 A. I don't look at my time as 18 involved with Seroquel as managing the 19 systems. 20 Q. Is the Touchstone system 21 used for products other than Seroquel? 22 A. Yes. 11 A. No. Not used by the 12 force. 12 force. 13 Q. Is it used for product other than Seroquel? 14 other than Seroquel? 15 A. Yes. 16 Q. And the MACS system 17 used for products other than Seroquel of the involved with Seroquel as managing the 18 A. Yes. 19 Q. KNOWBOL? 20 A. Yes. 21 Q. ICON? 22 A. Yes.	ets em, is that
12 Q. And products other than 13 Seroquel? 14 A. Yes. 15 Q. About how much of your time 16 is involved with Seroquel? 17 A. I don't look at my time as 18 involved with Seroquel as managing the 19 systems. 20 Q. Is the Touchstone system 21 used for products other than Seroquel? 22 A. Yes. 23 Yes. 24 Other than Seroquel? 15 A. Yes. 16 Q. And the MACS system 17 used for products other than Seroquel? 18 A. Yes. 19 Q. KNOWBOL? 20 A. Yes. 21 Q. ICON? 22 A. Yes.	ets em, is that
13 Q. Is it used for product other than Seroquel? 14 A. Yes. 15 Q. About how much of your time 16 is involved with Seroquel? 17 A. I don't look at my time as 18 involved with Seroquel as managing the systems. 19 systems. 20 Q. Is the Touchstone system 21 used for products other than Seroquel? 22 A. Yes. 23 Q. Is it used for product other than Seroquel? 24 A. Yes. 25 Q. Is it used for product other than Seroquel? 26 Q. And the MACS system is a system involved with Seroquel as managing the system involved with Seroquel as managing the involved wit	em, is that
14 A. Yes. 15 Q. About how much of your time 16 is involved with Seroquel? 17 A. I don't look at my time as 18 involved with Seroquel as managing the 19 systems. 20 Q. Is the Touchstone system 21 used for products other than Seroquel? 22 A. Yes. 14 other than Seroquel? 15 A. Yes. 16 Q. And the MACS system 17 used for products other than Seroquels 18 A. Yes. 19 Q. KNOWBOL? 20 A. Yes. 21 Q. ICON? 22 A. Yes.	em, is that
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16 is involved with Seroquel? 17 A. I don't look at my time as 18 involved with Seroquel as managing the 19 systems. 10 Q. And the MACS system 11 used for products other than Seroquel as managing the 12 Q. KNOWBOL? 13 Q. KNOWBOL? 14 Q. ICON? 15 Q. ICON? 16 Q. And the MACS system 17 used for products other than Seroquel? 18 A. Yes. 19 Q. KNOWBOL? 20 A. Yes. 21 Q. ICON? 22 A. Yes.	
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21 used for products other than Seroquel? 22 A. Yes. 21 Q. ICON? 22 A. Yes.	
22 A. Yes. 22 A. Yes.	
iza in winich of the annifolities (175 - 17 Shandharmaz	
23 Q. Which of the applications 23 Q. SnapPharma? 24 that we identified this morning, if any, 24 A. Yes.	
24 that we identified this morning, if any,	
Page 79	Page 81
1 deal with just Seroquel? 1 Q. AZER?	
2 MR. TORREGROSSA: You mean 2 A. Yes.	
3 from the notice? 3 Q. ViewPoint?	
4 MR. SMITH: Right. 4 A. Yes.	
5 BY MR. SMITH: 5 Q. LectureBureau Expr	ess?
6 Q. Are any of these exclusive 6 A. Yes.	C33 .
·	
8 page 3 of the letter. Why don't I just 8 A. Yes.	_
9 take them in order. SAP is not exclusive 9 Q. So none of those ar	
10 to Seroquel I assume. Right? 10 exclusive to Seroquel then. R	ignt?
11 A. Correct. 11 A. Correct.	
12 Q. And Touchstone is used for 12 Q. Have you ever beer	
13 other products? 13 called a database administrate	or at
14 A. Correct. 14 AstraZeneca?	
15 Q. If a sales representative 15 A. No, I have not.	
16 is makes a call on a physician for 16 Q. Do each of the data	abases
17 Seroquel and another product, how are 17 that we just discussed in the	
18 those call notes treated? 18 database administrator? Just	
19 MR. TORREGROSSA: In 19 terms. I'm going to go over t	_
20 Touchstone? 19 terms. Thi going to go over to	.,
1	
21 BY MR. SMITH: 21 A. In general, yes.	n or
1	
22 Q. In Touchstone. 22 Q. Did you help design	t ot any of
1	t or any of

I		Page 82			Dage 94
1	MR. TORREGROSSA: Objection.	Paye 02	1	of data?	Page 84
2	Compound.		2	A. Yes.	
3	BY MR. SMITH:		3	Q. And there are fields of data	
4	Q. Did you help design any of		4	in the tables?	
5	these databases?		5		
6	A. No.			A. Yes, sir.	
7			6 7	Q. Are the fields and by	
8	Q. Did you participate in the			"field," is that a category of	
1	development of any of these databases?		8	information that is tracked in the	
9	A. I did not do any development		9	database?	
10	work on any of these databases.		10	A. Yes.	
11	Q. Any programming?		11	Q. And you can search by fields	
12	A. Yes. I did programming with		12	in a database?	
13	SnapPharma.		13	A. Yes.	
14	Q. SnapPharma?		14	Q. And the purpose of a	
15	MR. TORREGROSSA: Keep your		15	database is to retain information in	
16	voice up just a bit.		16	electronic format that is easily	
17	THE WITNESS: I'm sorry.		17	accessible?	
18	BY MR. SMITH:		18	MR. TORREGROSSA: Objection	
19	Q. Any others?		19	to form.	
20	A. No.		20	THE WITNESS: The purpose is	
21	Q. Now, did you come from the		21	to contain information in	
22	Astra side or the Zeneca side prior to		22	electronic format. Easy is a	
23	the merger?		23	relative term.	
24	A. Zeneca.		24	BY MR. SMITH:	
		Page 83			Page 85
1	MR. TORREGROSSA: Can I have		1	Q. Are spreadsheets used as	
2	a one-minute break?		2	collections of data within AstraZeneca?	
3	MR. SMITH: Sure.		3	A. My understanding,	
4			4	spreadsheets have been used to collect	
5	(A recess was taken from		5	data.	
6	11:34 a.m. to 11:38 a.m.)		6	Q. Are you familiar with some	
7	11.54 a.m. to 11.50 a.m.)		7	of the spreadsheets that are used as	
8	BY MR. SMITH:		8	such?	
9	Q. Why don't we cover some		9	A. I am not.	
10	basics, make sure that we're all on the		10	Q. Do you know where	
11	same page. What is a database?		11	spreadsheets would be maintained?	
12	A. A database is a place in		12	MR. TORREGROSSA: For which?	!
13	which you store data for a system. Data		13	What are we talking about? Sales	
117			14	or what are we talking about here?	
1	is pieces of information data is just		174	or what are we taiking about here!	
14	is pieces of information data is just		15	MD CMTTH. Wall hala	
14 15	that, it's data.		15	MR. SMITH: Well, he's	
14 15 16	that, it's data. Q. How is information stored or		16	involved with Commercial, so I	
14 15 16 17	that, it's data. Q. How is information stored or organized in a database?		16 17	involved with Commercial, so I guess if we have spreadsheets that	
14 15 16 17 18	that, it's data. Q. How is information stored or organized in a database? A. A database stores data. The		16 17 18	involved with Commercial, so I guess if we have spreadsheets that are not a part of the database,	
14 15 16 17 18 19	that, it's data. Q. How is information stored or organized in a database? A. A database stores data. The way you connect those pieces of data		16 17 18 19	involved with Commercial, so I guess if we have spreadsheets that are not a part of the database, where would AstraZeneca employees	
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14 15 16 17 18 19 20 21 22	that, it's data. Q. How is information stored or organized in a database? A. A database stores data. The way you connect those pieces of data provides the information. Q. Is it organized within tables?		16 17 18 19 20 21 22	involved with Commercial, so I guess if we have spreadsheets that are not a part of the database, where would AstraZeneca employees keep those spreadsheets electronically. MR. TORREGROSSA: So if I	
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١.,	Page 86			Page 88
1	place that AstraZeneca employees	1	Q. And these applications that	
2	keep their spreadsheets?	2	we're talking about today, those are such	
3	MR. SMITH: That's a	3	tools, they allow you to search a	
4	starting point. We may have to	4	database by query? We'll go into more	li li
5	expound on that.	5	detail, particulars later, but in general	
6	BY MR. SMITH:	6	terms.	
7	Q. But is there a place within	7	MR. TORREGROSSA: In general	
8	the computer system where they would keep	8	terms do every one of these	
9	spreadsheets?	9	databases allow a search?	
10	A. In general, you can keep it	10	MR. SMITH: Yes.	
11	in your on your laptop, on your	11	THE WITNESS: In general	
12	desktop or on the server.	12	terms, a database, these databases	
13	Q. Is there any policy as far	13	could be searched.	
14	as retaining those spreadsheets?	14	BY MR. SMITH:	
15	A. For an explicit spreadsheet,	15	Q. And if you could search it,	50 61
16	no.	16	can you generate a report?	
17	Q. They would be contained on a	17	A. You can provide the data in	
18	laptop or on a PC?	18	a format, yes.	
19	A. Yes.	19	Q. And those reports could be	
20	Q. And each employee's, let's	20	exported?	
21	say, PC, how is that backed up?	21	A. Yes.	
22	 A. The PCs are backed up by an 	22	Q. Are you familiar with the	
23	agent called DLO to a server.	23	term "schema"?	
24	Q. Can you tell me what DLO	24	A. Yes.	
		├──		
1	P 07	1		Dago 90
	Page 87		O Is that the same or	Page 89
1 2	stands for?	1	Q. Is that the same or	Page 89
2	stands for? A. I do not know.	2	different from the I used the term	Page 89
2 3	stands for? A. I do not know. Q. And it's backed up to the	2	different from the I used the term "data map" earlier, and you said	Page 89
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