I				
١.	Page 90	١.		Page 92
1	A. In some way it would	1	A. There are a lot of fields in	
2	describe how the system is related.	2	the Touchstone database. I could not	
3	Q. Would each of these	3	recall all of them.	
4	databases have a schema?	4	Q. Could you give me the main	
5	A. Similarly to the ERD	5	ones?	
6	question, I don't believe every one would	6	 A. Things related to the call 	
7	necessarily have a schema.	7	entry would be things like the product,	
8	Q. Is "business analyst" a term	8	message delivered, notes.	
9	that you would use in connection with	9	Q. The message being what?	
10	these databases or systems?	10	A. A product has a set of	
11	A. No.	11	messages that you may deliver about the	
12	Q. "Business owner"?	12	product.	
13	A. Yes.	13	Q. These would be marketing	
14	Q. What does "business owner"	14	messages?	
15	mean to you?	15	MR. TORREGROSSA: Objection	
16	A. The business owner would be	16	to form.	
17	the person who would own the business	17	THE WITNESS: Yes. There	
18	that would own the data.	1		
19		18	are messages related to they're	
20	Q. Now, for Touchstone, is that CISS?	19	allowed to speak about the	
		20	product.	
21	A. We manage and own the system	21	BY MR. SMITH:	
22	or the database. The business owns the	22	Q. So these messages would be	
23	data.	23	promotional materials that have been	
24	Q. You manage the CISS	24	approved by AstraZeneca for use in the	
•	Page 01			Daga 03
1	Page 91 manages the system. Correct?	1	field?	Page 93
1 2	manages the system. Correct?	1 2	field? MR_TORREGROSSA: Objection	Page 93
2	manages the system. Correct? A. Yes.	2	MR. TORREGROSSA: Objection	Page 93
2 3	manages the system. Correct? A. Yes. Q. And the data is owned by	2	MR. TORREGROSSA: Objection to form.	Page 93
2 3 4	manages the system. Correct? A. Yes. Q. And the data is owned by for Touchstone, for example, the data is	2 3 4	MR. TORREGROSSA: Objection to form. THE WITNESS: No.	Page 93
2 3 4 5	manages the system. Correct? A. Yes. Q. And the data is owned by for Touchstone, for example, the data is owned by whom?	2 3 4 5	MR. TORREGROSSA: Objection to form. THE WITNESS: No. BY MR. SMITH:	Page 93
2 3 4 5 6	manages the system. Correct? A. Yes. Q. And the data is owned by for Touchstone, for example, the data is owned by whom? A. The business.	2 3 4 5 6	MR. TORREGROSSA: Objection to form. THE WITNESS: No. BY MR. SMITH: Q. Who approves the messages	Page 93
2 3 4 5 6 7	manages the system. Correct? A. Yes. Q. And the data is owned by for Touchstone, for example, the data is owned by whom? A. The business. Q. The business being	2 3 4 5 6 7	MR. TORREGROSSA: Objection to form. THE WITNESS: No. BY MR. SMITH: Q. Who approves the messages for use?	Page 93
2 3 4 5 6 7 8	manages the system. Correct? A. Yes. Q. And the data is owned by for Touchstone, for example, the data is owned by whom? A. The business. Q. The business being AstraZeneca or the business being	2 3 4 5 6 7 8	MR. TORREGROSSA: Objection to form. THE WITNESS: No. BY MR. SMITH: Q. Who approves the messages for use? A. There's an organization	Page 93
2 3 4 5 6 7 8 9	manages the system. Correct? A. Yes. Q. And the data is owned by for Touchstone, for example, the data is owned by whom? A. The business. Q. The business being AstraZeneca or the business being Commercial or what?	2 3 4 5 6 7 8	MR. TORREGROSSA: Objection to form. THE WITNESS: No. BY MR. SMITH: Q. Who approves the messages for use? A. There's an organization called PRA is my understanding. It's not	Page 93
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	manages the system. Correct? A. Yes. Q. And the data is owned by for Touchstone, for example, the data is owned by whom? A. The business. Q. The business being AstraZeneca or the business being Commercial or what? A. Commercial. Q. Is there somebody within Commercial who directs the development or changes of Touchstone? A. Yes. Q. And who would that person be? A. Howard Kaplan. Q. What kinds of searches can be done in Touchstone? Is that too broad a question? A. I'm confused on the question. Q. What are the fields in	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. TORREGROSSA: Objection to form. THE WITNESS: No. BY MR. SMITH: Q. Who approves the messages for use? A. There's an organization called PRA is my understanding. It's not in my area. Q. PRA is not part of Commercial? A. It's not part of Commercial from my understanding, no. Q. Do you know what PRA stands for? A. No. Q. Who would be knowledgeable about PRA? A. I am not familiar with who would lead that. Q. Can you output data from Touchstone in a native format?	Page 93
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	manages the system. Correct? A. Yes. Q. And the data is owned by for Touchstone, for example, the data is owned by whom? A. The business. Q. The business being AstraZeneca or the business being Commercial or what? A. Commercial. Q. Is there somebody within Commercial who directs the development or changes of Touchstone? A. Yes. Q. And who would that person be? A. Howard Kaplan. Q. What kinds of searches can be done in Touchstone? Is that too broad a question? A. I'm confused on the question.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. TORREGROSSA: Objection to form. THE WITNESS: No. BY MR. SMITH: Q. Who approves the messages for use? A. There's an organization called PRA is my understanding. It's not in my area. Q. PRA is not part of Commercial? A. It's not part of Commercial from my understanding, no. Q. Do you know what PRA stands for? A. No. Q. Who would be knowledgeable about PRA? A. I am not familiar with who would lead that. Q. Can you output data from	Page 93

24 (Pages 90 to 93)

		Page 94			Page 96
1	Q. What would be the native		1	pertinent part of the record.)	
2	format for that?		2		
3	A. Define "native."		3	MR. TORREGROSSA: I don't	
4	Q. Actually I was trying to ask		4	think as I said, Mr. Dowling is	
5	you about how how you would use the		5	not here to talk about the	
6	term "native" in connection with		6	production or his involvement in	
7	Touchstone, in relation to Touchstone?		7	the production as a 30(b)(6)	
8	 A. A native format would be the 		8	witness. I don't believe any	
9	manner in which it was producing it		9	database information has been	
10	displaying it in the same way it was		10	produced. I know we've been in	
11	being entered.		11	discussions about that, but I	
12	Q. It would be the manner in		12	don't think anything has been	
13	which it's displayed. Right?		13	produced yet. That's why	
14	A. Yes.		14	that's the source of confusion. I	
15	Q. And the data could be		15	don't know how he would know that	
16	displayed in other formats as well, could		16	if it hasn't been produced yet.	
17	it not, from Touchstone?		17	BY MR. SMITH:	
18	A. The data in the application		18	Q. Have you and this is in	
19	is displayed in the application in the		19	connection with the capabilities of the	
20	format in which it was entered.		20	system or any limitations to the system.	
21	Q. And if you looked at the		21	Have you attempted to collect information	
22	data in the native format, would you		22	from the Touchstone system and to output	
23	require the software, the Touchstone		23	it in any format?	
24	software, to be able to view it?		24	MR. TORREGROSSA: And I	
			- '	7 11 1 O 11 1 C 11 C 1 C 1 C 1 C 1 C 1 C	
		Page 95			Page 97
1	A. Yes.	•	1	object there. You can answer the	_
2	Q. Could that same data be		2	question, but I caution you not to	
3	outputted in a format that would be		3	reveal any legal requests or legal	
4	viewable without the software?		4	communications as part of the	
5	A. Yes.		5	answer. But you can answer the	
			ıj	answer. Dut you can answer the	
				•	
6	Q. What types of formats could		6	question.	
6 7	Q. What types of formats could it be outputted in?		6 7	question. THE WITNESS: We have	
6 7 8	Q. What types of formats could it be outputted in? A. Depending on the size and		6	question. THE WITNESS: We have provided for business needs the	
6 7 8 9	Q. What types of formats could it be outputted in? A. Depending on the size and amount, it could be a file that is common		6 7 8 9	question. THE WITNESS: We have provided for business needs the information in a summary format on	
6 7 8	Q. What types of formats could it be outputted in? A. Depending on the size and amount, it could be a file that is common to limited that has a definition to it.		6 7 8	question. THE WITNESS: We have provided for business needs the information in a summary format on total numbers of calls that may be	
6 7 8 9 10 11	Q. What types of formats could it be outputted in? A. Depending on the size and amount, it could be a file that is common to limited that has a definition to it. Q. If its output is common to		6 7 8 9 10	question. THE WITNESS: We have provided for business needs the information in a summary format on	
6 7 8 9 10 11 12	Q. What types of formats could it be outputted in? A. Depending on the size and amount, it could be a file that is common to limited that has a definition to it. Q. If its output is common to limited, it could be read by most		6 7 8 9 10 11 12	question. THE WITNESS: We have provided for business needs the information in a summary format on total numbers of calls that may be generated. BY MR. SMITH:	
6 7 8 9 10 11 12 13	Q. What types of formats could it be outputted in? A. Depending on the size and amount, it could be a file that is common to limited that has a definition to it. Q. If its output is common to		6 7 8 9 10	question. THE WITNESS: We have provided for business needs the information in a summary format on total numbers of calls that may be generated. BY MR. SMITH: Q. Total numbers of calls	
6 7 8 9 10 11 12 13 14	Q. What types of formats could it be outputted in? A. Depending on the size and amount, it could be a file that is common to limited that has a definition to it. Q. If its output is common to limited, it could be read by most commonly available programs such as Access?		6 7 8 9 10 11 12 13 14	question. THE WITNESS: We have provided for business needs the information in a summary format on total numbers of calls that may be generated. BY MR. SMITH: Q. Total numbers of calls indicating with what fields that you	
6 7 8 9 10 11 12 13 14 15	Q. What types of formats could it be outputted in? A. Depending on the size and amount, it could be a file that is common to limited that has a definition to it. Q. If its output is common to limited, it could be read by most commonly available programs such as Access? A. Yes.		6 7 8 9 10 11 12 13 14 15	question. THE WITNESS: We have provided for business needs the information in a summary format on total numbers of calls that may be generated. BY MR. SMITH: Q. Total numbers of calls indicating with what fields that you can recall off the top of your head?	
6 7 8 9 10 11 12 13 14 15 16	Q. What types of formats could it be outputted in? A. Depending on the size and amount, it could be a file that is common to limited that has a definition to it. Q. If its output is common to limited, it could be read by most commonly available programs such as Access? A. Yes. Q. In connection with the		6 7 8 9 10 11 12 13 14 15 16	question. THE WITNESS: We have provided for business needs the information in a summary format on total numbers of calls that may be generated. BY MR. SMITH: Q. Total numbers of calls indicating with what fields that you can recall off the top of your head? A. Aggregated information by	
6 7 8 9 10 11 12 13 14 15 16	Q. What types of formats could it be outputted in? A. Depending on the size and amount, it could be a file that is common to limited that has a definition to it. Q. If its output is common to limited, it could be read by most commonly available programs such as Access? A. Yes. Q. In connection with the production of documents in this case, are	i	6 7 8 9 10 11 12 13 14 15 16 17	question. THE WITNESS: We have provided for business needs the information in a summary format on total numbers of calls that may be generated. BY MR. SMITH: Q. Total numbers of calls indicating with what fields that you can recall off the top of your head? A. Aggregated information by selling team, region, district,	
6 7 8 9 10 11 12 13 14 15 16 17 18	Q. What types of formats could it be outputted in? A. Depending on the size and amount, it could be a file that is common to limited that has a definition to it. Q. If its output is common to limited, it could be read by most commonly available programs such as Access? A. Yes. Q. In connection with the production of documents in this case, are the contents of Touchstone being produced.	d	6 7 8 9 10 11 12 13 14 15 16 17 18	question. THE WITNESS: We have provided for business needs the information in a summary format on total numbers of calls that may be generated. BY MR. SMITH: Q. Total numbers of calls indicating with what fields that you can recall off the top of your head? A. Aggregated information by selling team, region, district, territory. Total calls.	
6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. What types of formats could it be outputted in? A. Depending on the size and amount, it could be a file that is common to limited that has a definition to it. Q. If its output is common to limited, it could be read by most commonly available programs such as Access? A. Yes. Q. In connection with the production of documents in this case, are the contents of Touchstone being produced in a native format or some other format?	d	6 7 8 9 10 11 12 13 14 15 16 17 18 19	question. THE WITNESS: We have provided for business needs the information in a summary format on total numbers of calls that may be generated. BY MR. SMITH: Q. Total numbers of calls indicating with what fields that you can recall off the top of your head? A. Aggregated information by selling team, region, district, territory. Total calls. Q. But not individual call	
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. What types of formats could it be outputted in? A. Depending on the size and amount, it could be a file that is common to limited that has a definition to it. Q. If its output is common to limited, it could be read by most commonly available programs such as Access? A. Yes. Q. In connection with the production of documents in this case, are the contents of Touchstone being produced in a native format or some other format? MR. TORREGROSSA: Hold on. Objection. Could I have the	d	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	question. THE WITNESS: We have provided for business needs the information in a summary format on total numbers of calls that may be generated. BY MR. SMITH: Q. Total numbers of calls indicating with what fields that you can recall off the top of your head? A. Aggregated information by selling team, region, district, territory. Total calls. Q. But not individual call information then, is that what you're saying?	

and such a doctor and detailed such and such a product? 3						
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	Page 102			Page 104
1	A. The PIR is sent over to the	1	Q. Is there a field for whether	
2	Webster system. At that point, I don't	2	they have been invited to a talk or not?	
3	know what happens to it.	3	 A. There's an activity field 	
4	Q. Does it somehow come back	4	that describes that call, and it may have	
5	from the Webster system? Assuming it's	5	a field about attendance to a program.	
6	fulfilled in medical affairs, does it	6	Q. Do you recall what the	
7	somehow come back into the Touchstone	7	choices are for that field, the entries	
8	system	8	that can be made?	
9	A. No, it doesn't.	9	A. I don't recall.	
10	Q to show that I'm	10	Q. For example, if the salesman	
11	sorry?	11	just made a call at the office, there	
12	A. To my knowledge, no, it does	12	would be a descriptor for that?	
13	not.	13	A. Right, the ones I do recall	
14	Q. Would the system show what	14	I know are stand up detail.	
15	to ask it another way, would the	15	•	
16	system show what professional information	16	Q. That would be an office call?	
17	has been given to the doctor, Touchstone?	17		
18	A. I do not believe so.		A. Yes.	
19		18	Q. Stand up detail?	
	Q. Would the system show	19	A. Yes.	
20	whether any samples have been left with	20	Q. If you took the doctor to	
21	the doctor?	21	lunch, what would that be?	
22	A. Yes.	22	 A. That's referred to as a, I 	
23	Q. Would the system show	23	believe, lunch and learn.	
24	whether the doctor requested any samples?	24	Q. If he invited the doctor to	
1	Page 103	•		Page 105
1	A. Yes.	1	a convention or to go on some sort of a	Page 105
2	A. Yes. Q. Would the system show	2	trip, would that be an available entry?	Page 105
2 3	A. Yes. Q. Would the system show whether the doctor was invited to any	2 3	trip, would that be an available entry? A. I don't know of an entry	Page 105
2 3 4	A. Yes. Q. Would the system show whether the doctor was invited to any sort of speaking on the with regard to	2 3 4	trip, would that be an available entry? A. I don't know of an entry around that. I can't recall what they	Page 105
2 3 4 5	A. Yes. Q. Would the system show whether the doctor was invited to any sort of speaking on the with regard to Seroquel?	2 3 4 5	trip, would that be an available entry? A. I don't know of an entry around that. I can't recall what they might be, if there was one.	Page 105
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22 Q. Sof for example, if	1				
LEG OF WHILL INDICATE THE LAST TABLE TO BOTTOM	23	Q. Will it indicate the		23	· · ·
24 All the state of the st					
24 conditions in which the doctor is 24 to the formulary for the State of				4 T	to the formulary for the State Of

			· · · · · ·		
		Page 110			Page 112
1	Pennsylvania, there would be information		1	Commercial to get it for him, I assume?	
2	concerning that in the Touchstone		2	A. Yes.	
3	database?		3	Q. And who would that person go	
4	MR. TORREGROSSA: Objection		4	to? Are they doing it directly	
5	to form.		5	themselves or are they going to go to	
6	THE WITNESS: There would be		6	somebody in CISS to get a report?	
7	formulary information if the State		7	· · · · · · · · · · · · · · · · · ·	
8	of Pennsylvania was listed. There			, , , , , , , , , , , , , , , , , , , ,	
9			8	CISS to get the information.	
10	could be formulary information		9	Q. So, for example, a sales	
1	listed there, yes.		10	representative wouldn't be able to	
11	BY MR. SMITH:		11	generate a report from Touchstone him or	
12	Q. If the president of the		12	herself? So I get some picture of this,	
13	company wanted information from the		13	would they have to send a request and	
14	Touchstone system, would he go to you or		14	then an IT person, an IS person would	
15	would he go to Jayne, a resource person?	:	15	actually do that report for them? Is	
16	I'm trying to who would he go to to	:	16	that kind of the way it works?	
17	obtain the information and output a		17	A. Help me understand.	
18	report from the Touchstone system?		18	Q. Sure. If a sales rep	
19	A. I don't think he would be		19	uses the Touchstone system. Right?	
20	calling me. If there was a request for		20	A. Yes.	
21	information, he would work with the		21	Q. They have it available to	
22	appropriate IS contact within our group		22		
23				them over the Intranet through their	
1	that could help him who would then make		23	laptop, I assume. Right?	
24	that same request as I described it to		24	A. Yes.	
	N. S. C.	Dage 111		· · · · · · · · · · · · · · · · · · ·	D 112
1	the request system for that information	Page 111	1	O And if those wanted	Page 113
1 2	the request system for that information.	Page 111	1	Q. And if they wanted	Page 113
2	Q. Would that be a resource	Page 111	2	information about Dr. Jones just before	Page 113
2	Q. Would that be a resource request? We talked about Jayne I	Page 111	2	information about Dr. Jones just before they went to see him, there's probably	Page 113
2 3 4	Q. Would that be a resource request? We talked about Jayne I forget her last name Tomforde, being	Page 111	2 3 4	information about Dr. Jones just before they went to see him, there's probably a is there a certain amount of	Page 113
2 3 4 5	Q. Would that be a resource request? We talked about Jayne I forget her last name Tomforde, being head of resources for IS. Is that	Page 111	2 3 4 5	information about Dr. Jones just before they went to see him, there's probably a is there a certain amount of information that they can is readily	Page 113
2 3 4	Q. Would that be a resource request? We talked about Jayne I forget her last name Tomforde, being head of resources for IS. Is that something that would go to her division?	Page 111	2 3 4 5 6	information about Dr. Jones just before they went to see him, there's probably a is there a certain amount of	Page 113
2 3 4 5	Q. Would that be a resource request? We talked about Jayne I forget her last name Tomforde, being head of resources for IS. Is that	Page 111	2 3 4 5	information about Dr. Jones just before they went to see him, there's probably a is there a certain amount of information that they can is readily	Page 113
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		Page 114		Page	116
1	A. It kind of doesn't.		1	and provides script level information for	
2	Q. There's no point in wasting		2	that doctor.	
3	time with questions that don't make any		3	Q. I think we're starting to	
4	sense.		4	talk the same things here. I was talking	
5	MR. TORREGROSSA: I was		5	about a broad-based request earlier, I	
6	confused, too.		6	was thinking in terms of summaries. I	
7	BY MR. SMITH:		7	think we're kind of headed in that	
8	Q. Is sales information in		8	direction. So that's good.	
9	Touchstone?		9		
10	A. Yes.			You say "script." What do	
11	Q. What types of sales		10	you mean by "script"?	
12			11	A. RXes.	
13	information would be available through		12	Q. No, I'm sorry, the script	
	Touchstone?		13	reporting what did you say?	
14	A. The IMS data information.		14	A. Prescription.	
15	Q. Is that something that a		15	Q. So you were talking about	
16	sales representative could access		16	prescriptions.	
17	directly himself or herself?		17	Does the sales	
18	A. Yes.		18	representative in the field have access	
19	Q. If you wanted a report from		19	to the Touchstone Reporting?	
20	IMS, is there another way to get at it		20	A. Yes.	
21	other than through Touchstone?		21	Q. And anything that you could	
22	A. Yes.		22	get through Touchstone Reporting could be	
23	Q. What other systems would		23	outputted into let's say printed out,	
24	contain IMS data?		24	let's talk about if we wanted to print it	
1	A. Touchstone Reporting.	Page 115	1	Page	117
2	Q. How does Touchstone		2	out, I was trying to think of what	
3	Reporting differ from what I've been			whether you would have to have the	
4	calling Touchstone, I guess?		3	Touchstone software to view the data or	
5			4	whether you could put it into a common to	
1			5	limited file and view it with Access or	
6	system where the information is provided		6	something like that?	
7	around your business area, the rep's		7	MR. TORREGROSSA: Objection	
8	business. So it would contain that IMS		8	to form.	
9	type data that you just described.		9	BY MR. SMITH:	
10	Q. I'm not sure I understood		10	Q. Do you understand what I'm	
11	your answer. It's probably not your		11	talking about?	
12	fault, probably more my fault. I'm		12	A. Yeah, I'm not sure which	
13	trying to understand how Touchstone		13	system.	
14	Reporting is different from Touchstone.		14	Q. I'm talking about the form	
15	I guess maybe we have to say if you		15	of the output from Touchstone Reporting	
16	can tell me what is Touchstone and then		16	and how you would view that data. Let's	
17	tell me what is Touchstone Reporting, and		17	say if you wanted to if somebody said	
18	I'll try to understand the difference.		18	I want you to give me all the data in	
			19	Touchstone, you would go through you	
19	 A. Touchstone is your sales 		ΤJ	The state of the s	
20	A. Touchstone is your sales force automation tool. It is your data		20	would use Touchstone Reporting as a tool	
20 21					
20 21 22	force automation tool. It is your data		20	would use Touchstone Reporting as a tool	
20 21	force automation tool. It is your data entry point. It has the information about your doctor, you know, address and type of stuff around them. The Reporting	į	20 21	would use Touchstone Reporting as a tool to do that. Right? MR. TORREGROSSA: You mean	
20 21 22	force automation tool. It is your data entry point. It has the information about your doctor, you know, address and		20 21 22	would use Touchstone Reporting as a tool to do that. Right?	

					
		ge 118			Page 120
1	MR. SMITH: Yeah.		1	export it in the form of an Access	
2	BY MR. SMITH:		2	spreadsheet?	
3	Q. Could you do that with		3	MR. TORREGROSSA: And the	
4	Touchstone Reporting, could you give		4	question is still all the data in	
5	somebody all the data that is in the		5	that table?	
6	Touchstone database?		6	MR. SMITH: In one of the	
7	A. No.		7	3,000 tables.	
8	Q. What would you use to get at	ŀ	8	MR. TORREGROSSA: Could all	
9	the all of the data in the Touchstone		9		
10	database?		10	the data in one of those tables be	
11	MR. TORREGROSSA: Objection		11	put in one spreadsheet?	
12	to form. You mean search it, get			MR. SMITH: Yes, could you	
13	it, search it?		12	put it in an Access spreadsheet.	
14	·		13	MR. TORREGROSSA: Thank you	
	MR. SMITH: Produce it.		14	for the clarification. Go ahead.	
15	Search it, get it produced.		15	THE WITNESS: Depending on	
16	MS. RADLIFF: Export it.		16	the table you select. It's the	
17	MR. TORREGROSSA: What would		17	amount of information would limit	
18	you do to export all the data in	- 1	18	you on how much you could put in a	
19	Touchstone?		19	spreadsheet.	
20	MR. SMITH: Sure. Thank		20	BY MR. SMITH:	
21	you.		21	Q. Access would have a limit as	
22	THE WITNESS: That would be	1:	22	to how much data you could put into one	
23	huge. The data is contained in		23	table. Right?	
24	the Touchstone database, is where		24	A. Yes. The tools you're	
				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
	Pag	e 119			Page 121
1	you would find all the data. That		1	describing would have limits.	
2	would be the only place you would	1	2	Q. Access now, there are	
3	find all that data.	ļ	3	other tools that can handle more data	
4	BY MR. SMITH:	į	4	than Access. Right?	
5	Q. And that is a big table with		5	A. Yes.	
6	rows and fields. Right?		6	Q. So what are some of the	
7	A. I believe the count is		7	what are some of the formats let's say	
8	somewhere in like 3,000 tables. It's		8	you have one of the 3,000 tables, it's	
9	Q. So each one of those tables		9	too big to put into an Access database.	
10	could be exported then. Right?		10	One possibility might be, could you	
11	MR. TORREGROSSA: Objection		11	output it in terms of common to limited	
12	to form.		12	data?	
13	THE WITNESS: In theory an				
14	individual table could be		13	A. Yes.	
15			14	Q. And then it would be up to	
	exported.		15	the reader to use some type of tool to be	
16	BY MR. SMITH:		16	able to organize it and put it back into	
1 4 7	Q. In what formats would it be		17	a table, I guess. Right?	
17		- 13	18	A. I would assume so, yes.	
18	exported? What would you be capable of				
18 19	doing in exporting it in one form or		19	Q. And that would be that	
18 19 20	doing in exporting it in one form or another? What would be your choices?		19 20	Q. And that would be that would be doable. Right?	
18 19 20 21	doing in exporting it in one form or			•	
18 19 20 21 22	doing in exporting it in one form or another? What would be your choices?		20	would be doable. Right?	
18 19 20 21	doing in exporting it in one form or another? What would be your choices? MR. TORREGROSSA: Objection		20 21	would be doable. Right? MR. TORREGROSSA: Objection	
18 19 20 21 22	doing in exporting it in one form or another? What would be your choices? MR. TORREGROSSA: Objection to form.		20 21 22	would be doable. Right? MR. TORREGROSSA: Objection to form.	

1 .		age 122			Page 124
1	it out into a you could output it to a		1	the deletion of data or anything?	
2	common to limited file. Right?		2	MR. TORREGROSSA: Objection	
3	MR. TORREGROSSA: Objection	ļ	3	to form.	
4	to form.	į	4	THE WITNESS: The Siebel	
5	THE WITNESS: A table of	ľ	5	system may track an addition to a	
6	data could be exported into a		6	table or a change in that table	
7	common to limited file, yes.		7	structure. My understanding of	
8	BY MR. SMITH:		8	the Siebel system is you don't	
9	 Q. Now, would there be any sort 		9	want to do too much monkeying	
10	of metadata that would be associated with		10	around. It could break it. It's	
11	that table, this hypothetical table we're		11	not ours.	
12	talking about?		12	BY MR. SMITH:	
13	MR. TORREGROSSA: In		13	Q. Does Siebel provide do	
14	Touchstone?		14	you have access to information from	
15	MR. SMITH: In Touchstone.	1	15	Siebel that would tell you how to export	
16	THE WITNESS: Yes.		16	data?	
17	BY MR. SMITH:		17	A. Yes.	
18	Q. What types of data would be		18	Q. As part of your contract	
19	there?	1	19	with Siebel, would they if you asked	
20	A. Data about the data.		20	them to export data for you, would they	
21	Q. Can you give me some		21	help you do it?	
22	examples? Let's say let's pick a		22	A. No.	
23	table if you could, just pick one off the	1	23	Q. Would they tell you how to	
24	top of your head out of Touchstone and	1	24	do it if you asked them?	
	Pa	age 123			Page 125
1	say we wanted to just pick one?		1	A. Yes. I believe they would.	Ĭ
2	A. I couldn't pick an explicit		2	Q. You haven't talked to them	
3	table name. If you had a table, it may	ŀ	3	about the possibility of outputting data	
4	describe		4	from Touchstone, talk to anybody from	
1			4 5	from Touchstone, talk to anybody from Siebel?	
5	Q. A table about something.		5	Siebel?	
1	Q. A table about something. Pick one and say it's about something.		5 6	Siebel? MR. TORREGROSSA: You can	
5 6 7	Q. A table about something.Pick one and say it's about something.A. The data may tell you		5 6 7	Siebel? MR. TORREGROSSA: You can answer the question, but in doing	
5 6 7 8	Q. A table about something. Pick one and say it's about something. A. The data may tell you something about the field, the size of a		5 6 7 8	Siebel? MR. TORREGROSSA: You can answer the question, but in doing so, don't reveal any legal	
5 6 7 8 9	Q. A table about something. Pick one and say it's about something. A. The data may tell you something about the field, the size of a field, how big it is, how many characters		5 6 7 8 9	Siebel? MR. TORREGROSSA: You can answer the question, but in doing so, don't reveal any legal requests or legal communications	
5 6 7 8 9	Q. A table about something. Pick one and say it's about something. A. The data may tell you something about the field, the size of a field, how big it is, how many characters of information it may be able to hold,		5 6 7 8 9	Siebel? MR. TORREGROSSA: You can answer the question, but in doing so, don't reveal any legal requests or legal communications that were made as part.	
5 6 7 8 9 10 11	Q. A table about something. Pick one and say it's about something. A. The data may tell you something about the field, the size of a field, how big it is, how many characters of information it may be able to hold, the type.		5 6 7 8 9 10 11	Siebel? MR. TORREGROSSA: You can answer the question, but in doing so, don't reveal any legal requests or legal communications that were made as part. THE WITNESS: I have not	
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1	A. I'm a leader of it, yes.	1	Q. Now, if you dismantled the	
2	Q. So it would be somebody on	2	Compass system, the data is still on the	
3	your team?	3	server. Right?	
4	A. It could be, or Jayne's	4	A. Yes.	
5	team.	5	Q. So you had that data?	
6	Q. Is the Compass system still	6	A. Yes.	
7	accessible in its original form on a	7	Q. And how would for your	
8	server somewhere?	8	own purposes, if you wanted to export	
9	MR. TORREGROSSA: Original	9	that if you wanted to search that	
10	form as in you're able to view it	10	data, how would you do it?	
11	as you were when it was in the	11	· · · · · · · · · · · · · · · · · · ·	
12	field?	12	5 ,	
13	MR. SMITH: Exactly.	13	database query tool.	
14	THE WITNESS: No.		Q. What tool would you use?	
15	BY MR. SMITH:	14	A. There's a tool called Toad	
16		15	that allows you to query the database	
17	Q. When was it I'm looking	16	directly.	
	for a better word than "retired," but not	17	Q. Is that a commercially	
18	when did you stop using it, but when was	18	available program that anybody could buy?	
19	the let's say the system dismantled.	19	A. Yes.	
20	Does that make sense?	20	Q. So could you use Toad to	
21	A. 12/31/2006 the system was	21	query the database and generate reports?	
22	retired.	22	 A. You could use Toad to query 	
23	Q. Now, only data from 2005	23	the database, write a SQL statement of	
24	forward was migrated into Touchstone. Is	24	information you're asking about to	
		 		
	Page 12	,	Page	e 129
1	Page 12 that correct?	, 1		e 129
2		I .	Page produce that information, to produce a set of data or information data	e 129
ı	that correct?	1	produce that information, to produce a set of data or information data	e 129
2	that correct? A. Correct. Q. So for data prior to 2005,	1 2	produce that information, to produce a set of data or information data related to your request, yes.	e 129
2	that correct? A. Correct. Q. So for data prior to 2005, before you dismantled the system, was the	1 2 3 4	produce that information, to produce a set of data or information data related to your request, yes. Q. Could you use Toad to	e 129
2 3 4	that correct? A. Correct. Q. So for data prior to 2005, before you dismantled the system, was the data exported in any format?	1 2 3 4 5	produce that information, to produce a set of data or information data related to your request, yes. Q. Could you use Toad to produce the entire database?	e 129
2 3 4 5	that correct? A. Correct. Q. So for data prior to 2005, before you dismantled the system, was the data exported in any format? A. The database exists in the	1 2 3 4	produce that information, to produce a set of data or information data related to your request, yes. Q. Could you use Toad to produce the entire database? MR. TORREGROSSA: Objection	e 129
2 3 4 5 6	that correct? A. Correct. Q. So for data prior to 2005, before you dismantled the system, was the data exported in any format? A. The database exists in the same format. The system	1 2 3 4 5 6 7	produce that information, to produce a set of data or information data related to your request, yes. Q. Could you use Toad to produce the entire database? MR. TORREGROSSA: Objection to form. Could you use Toad to	e 129
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2 3 4 5 6 7 8	that correct? A. Correct. Q. So for data prior to 2005, before you dismantled the system, was the data exported in any format? A. The database exists in the same format. The system Q. It's my fault. It's not your fault. I'm not following you, but	1 2 3 4 5 6 7 8 9	produce that information, to produce a set of data or information data related to your request, yes. Q. Could you use Toad to produce the entire database? MR. TORREGROSSA: Objection to form. Could you use Toad to extract the whole database? MR. SMITH: To extract it,	e 129
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	Page 130		Page 132
1	hear you.	1	Q. Did I misstate it? If I
2	 A. It would be very complex. 	2	did, it wasn't intentional. Maybe I
3	It's a very large database. And it would	3	misunderstood what you said. Do you want
4	take time in understanding of the	4	to restate it?
5	relationships of the tables within the	5	A. Yes, please.
6	database.	6	Q. How far back do you have
7	Q. But you have that	7	well, I probably know you have data
8	understanding of the relationships, do	8	back to at least 1997 for Seroquel in the
9	you not?	9	Compass database. Right?
10	A. I have a data dictionary	10	· · · · · · · · · · · · · · · · · · ·
11	that tells me the understanding of how	11	•
12		ł	Q. And why not?
13	that all interrelates. It's large.	12	A. Compass was not a Zeneca
1	Q. That data dictionary, would	13	tool.
14	that be like the ERD for Compass?	14	Q. It was an Astra tool?
15	A. In combination.	15	A. Yes.
16	Q. Would you be the person to	16	Q. And Astra and Zeneca merged
17	do that? If AstraZeneca were looking for	17	in September of '99 or thereabouts
18	the best person to do that, would you be	18	approximately?
19	the best person to do that?	19	A. Yeah. The merger began in
20	MR. TORREGROSSA: To what?	20	1999.
21	MR. SMITH: To extract the	21	Q. So you had information going
22	data from the Compass database.	22	back to sometime in 1999 for Seroquel in
23	THE WITNESS: No, I would	23	the Compass database, then. Right?
24	not.	24	A. Yes.
	Page 131		Page 133
1	BY MR. SMITH:		
	51 1 II (I 51 II I I I	1	Q. This would be a sales
2	Q. Who would do that?	1 2	•
	Q. Who would do that?		automation tool, data in connection with
2	Q. Who would do that?A. The resources the request	2	automation tool, data in connection with that. Right?
2 3 4	Q. Who would do that? A. The resources the request was put in, the resources was more	2 3 4	automation tool, data in connection with that. Right? A. Yes.
2 3 4 5	Q. Who would do that? A. The resources the request was put in, the resources was more skilled in that area.	2 3 4 5	automation tool, data in connection with that. Right? A. Yes. Q. Now, for information from
2 3 4 5 6	Q. Who would do that? A. The resources the request was put in, the resources was more skilled in that area. Q. Now, Compass goes back how	2 3 4 5 6	automation tool, data in connection with that. Right? A. Yes. Q. Now, for information from Zeneca prior to the merger, was there a
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2 3 4 5 6 7 8	Q. Who would do that? A. The resources the request was put in, the resources was more skilled in that area. Q. Now, Compass goes back how far? MR. TORREGROSSA: The system	2 3 4 5 6 7 8	automation tool, data in connection with that. Right? A. Yes. Q. Now, for information from Zeneca prior to the merger, was there a sales automation tool in use? A. Yes.
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	Page 134			Page 136
1	Q. Which data related to	1	A. Yes.	
2	Seroquel no longer exists?	2	Q. And do you know what data	
3	A. The tables related I	3	was contained in SnapPharma prior to its	
4	don't know what tables aren't there.	4	decommissioning?	
5	There are some tables that were retained.	5	 A. I don't recall explicitly 	
6	Q. Do those tables have	6	what was in there.	
7	descriptive names in SnapPharma?	7	Q. Is there anything that you	
8	A. Yes.	8	can think of other than the sales call	
9	Q. Do you know approximately	9	information and the sampling information	
10	how many tables there are in SnapPharma?	10	which you mentioned, is there anything	
11	Is it hundreds, is it thousands?	11	else that you would have expected to find	
12	A. The SnapPharma database	12	in there that you either don't think is	
13	doesn't exist.	13	there or you're not sure is there?	
14	Q. Doesn't exist. But the	14	A. The tables of information,	
15	tables still exist. Right?	15	the ones I can't recall what wasn't	
16	A. Some of the tables exist.	16	brought forward.	
17	Q. Some of the tables exist.	17	Q. If you can't remember, you	
18	Okay. We're trying to figure out which	18	can't remember.	
19	tables don't exist any longer. Do you	19	Do you know what happened to	
20	know which ones don't exist any longer?	20	the information that is not there now?	
21	A. I do not.	21	A. I do not.	
22	Q. So the database is	22	Q. Have you at any time since	
1	•	23	the strike that.	
23	incomplete, but you're not sure what it	24	Was the SnapPharma data	
24	does or does not contain. Is that	24	was the shapfhaitha data	
	Page 135			Page 137
1	correct?	1	migrated to Compass after the merger?	J
2	A. No.	2	A. All data from September 1,	
3	Q. Okay. Can you straighten me	3	1999 forward.	
4	out?	4	Q. And for the information	
5	A. It contains the call data	5	prior to September 1, 1999, did it it	
6			prior to ouptorribor 1/ 1333/ ara is	
	and the sample data and the prescribers	1		
	and the sample data and the prescribers	6	simply remained in the SnapPharma	
7	that were in that database.	6 7	simply remained in the SnapPharma database, it just wasn't migrated?	
7 8	that were in that database. Q. A better question would be,	6 7 8	simply remained in the SnapPharma database, it just wasn't migrated? A. Correct.	
7 8 9	that were in that database. Q. A better question would be, what other information is not there now	6 7 8 9	simply remained in the SnapPharma database, it just wasn't migrated? A. Correct. Q. And that would have gone	
7 8 9 10	that were in that database. Q. A better question would be, what other information is not there now that used to be there? Let me try it	6 7 8 9 10	simply remained in the SnapPharma database, it just wasn't migrated? A. Correct. Q. And that would have gone back to what year, 1994?	
7 8 9 10 11	that were in that database. Q. A better question would be, what other information is not there now that used to be there? Let me try it again. I'll rephrase the question, it	6 7 8 9 10 11	simply remained in the SnapPharma database, it just wasn't migrated? A. Correct. Q. And that would have gone back to what year, 1994? A. Launch.	
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7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	that were in that database. Q. A better question would be, what other information is not there now that used to be there? Let me try it again. I'll rephrase the question, it would be easier. Were you familiar are you familiar with the SnapPharma database? A. I was. Q. You were. And it was put out of commission when? A. During merger. Q. During the merger. So sometime in 1999? A. In 2000. Q. In 2000. Up until 2000,	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	simply remained in the SnapPharma database, it just wasn't migrated? A. Correct. Q. And that would have gone back to what year, 1994? A. Launch. Q. Launch. 1997? A. Launch of SnapPharma? Q. Yes. A. 1996. MR. TORREGROSSA: I think we were confused. Is it data back related to Seroquel? Is that the question? MR. SMITH: Related to Seroquel. We might as well limit it to Seroquel.	

BY MR. SMITH: 2 Q. So there exists now a set of 3 data from launch in 1997 until the merger 4 in 1999, that SnapPharma data still 5 exists today. Right? 6 A. There is a set of data, yes. 7 Q. And would you be able to 8 access that data or get somebody in 9 resources to access that data? 11 Compound. 12 BY MR. SMITH: 12 Q. And who was the — who or 13 database? 14 that data or get somebody in 15 Ground on the state of	i					
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1	Q. Do you know if it contained		1	A. I don't know.	
2	any PIR data?		2	Q. I've been talking about	
3	 A. It did not contain PIR data. 		3	outputting or exporting and using these	
4	Q. Now, PIR data is currently		4	terms pretty generally. Is there a term	
5	contained in Touchstone. Is that		5	within the Oracle world unloading data or	
6	correct?		6	data? Is there such a term, "unloading"?	
7	A. The record is passed through		7	A. Unloading?	
8	and the record of it passing through.		8	Q. Yes.	
9	Q. The record of a request		9	A. I'm not familiar with that	
10	having been made?		10	term.	
11	A. Yes.		11	Q. What does the term	
12	Q. Was that true of Compass		12	•	
13	also?		l .	"replication" mean in relationship to an	
14	A. Yes.		13	Oracle database, is that a term that you	
15			14	would use?	
16	Q. Are you aware of any audits of PIRs?		15	A. The term "replication" in	
17			16	relation to an Oracle database. In my	
	MR. TORREGROSSA: You can		17	mind, that would be replicating	
18	answer. Of course, don't reveal		18	information between a database.	
19	any legal requests or audits of		19	Q. From one database to	
20	the PIR system. But other than		20	another?	
21	that, you can answer the question		21	A. Yes.	
22	if you understand it.		22	Q. Kind of like copying?	
23	THE WITNESS: Can you define		23	A. Yes.	
24	that?		24	Q. You could do that with a	
<u> </u>					
	DV MD CMTTH	Page 143			Page 145
1	BY MR. SMITH:	Page 143	1	database such as Touchstone, you could	Page 145
2	Q. Okay. Does it tell you	Page 143	1 2	copy from one from Touchstone to	Page 145
2 3	Q. Okay. Does it tell you is there a way to tell what became of a	Page 143			Page 145
2 3 4	Q. Okay. Does it tell you is there a way to tell what became of a request, whether it was fulfilled or not,	Page 143	2	copy from one from Touchstone to	Page 145
2 3	Q. Okay. Does it tell you is there a way to tell what became of a	Page 143	2 3	copy from one from Touchstone to another database?	Page 145
2 3 4	Q. Okay. Does it tell you is there a way to tell what became of a request, whether it was fulfilled or not,	Page 143	2 3 4	copy from one from Touchstone to another database? MR. TORREGROSSA: Objection	Page 145
2 3 4 5	Q. Okay. Does it tell you is there a way to tell what became of a request, whether it was fulfilled or not, what the response was by AstraZeneca?	Page 143	2 3 4 5	copy from one from Touchstone to another database? MR. TORREGROSSA: Objection to form.	Page 145
2 3 4 5 6	Q. Okay. Does it tell you is there a way to tell what became of a request, whether it was fulfilled or not, what the response was by AstraZeneca? A. I do not know how that was	Page 143	2 3 4 5 6	copy from one from Touchstone to another database? MR. TORREGROSSA: Objection to form. THE WITNESS: Yes.	Page 145
2 3 4 5 6 7	Q. Okay. Does it tell you is there a way to tell what became of a request, whether it was fulfilled or not, what the response was by AstraZeneca? A. I do not know how that was done.	Page 143	2 3 4 5 6 7	copy from one from Touchstone to another database? MR. TORREGROSSA: Objection to form. THE WITNESS: Yes. BY MR. SMITH:	Page 145
2 3 4 5 6 7 8	Q. Okay. Does it tell you is there a way to tell what became of a request, whether it was fulfilled or not, what the response was by AstraZeneca? A. I do not know how that was done. Q. Who would know about that?	Page 143	2 3 4 5 6 7 8	copy from one from Touchstone to another database? MR. TORREGROSSA: Objection to form. THE WITNESS: Yes. BY MR. SMITH: Q. To another Oracle database? Would it have to be an Oracle database?	Page 145
2 3 4 5 6 7 8	Q. Okay. Does it tell you is there a way to tell what became of a request, whether it was fulfilled or not, what the response was by AstraZeneca? A. I do not know how that was done. Q. Who would know about that? A. That was the Webster system. Q. Who would be knowledgeable	Page 143	2 3 4 5 6 7 8 9	copy from one from Touchstone to another database? MR. TORREGROSSA: Objection to form. THE WITNESS: Yes. BY MR. SMITH: Q. To another Oracle database? Would it have to be an Oracle database? A. In my mind it would be. The	Page 145
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2 3 4 5 6 7 8 9 10 11 12	Q. Okay. Does it tell you is there a way to tell what became of a request, whether it was fulfilled or not, what the response was by AstraZeneca? A. I do not know how that was done. Q. Who would know about that? A. That was the Webster system. Q. Who would be knowledgeable about the Webster system on the IS side? A. Steve Aaronson.	Page 143	2 3 4 5 6 7 8 9 10 11 12	copy from one from Touchstone to another database? MR. TORREGROSSA: Objection to form. THE WITNESS: Yes. BY MR. SMITH: Q. To another Oracle database? Would it have to be an Oracle database? A. In my mind it would be. The term how replication would take place is what I'm not sure of.	Page 145
2 3 4 5 6 7 8 9 10 11 12 13	Q. Okay. Does it tell you is there a way to tell what became of a request, whether it was fulfilled or not, what the response was by AstraZeneca? A. I do not know how that was done. Q. Who would know about that? A. That was the Webster system. Q. Who would be knowledgeable about the Webster system on the IS side? A. Steve Aaronson. Q. Now, Compass was also an	Page 143	2 3 4 5 6 7 8 9 10 11 12 13	copy from one from Touchstone to another database? MR. TORREGROSSA: Objection to form. THE WITNESS: Yes. BY MR. SMITH: Q. To another Oracle database? Would it have to be an Oracle database? A. In my mind it would be. The term how replication would take place is what I'm not sure of. Q. That would be a resource	Page 145
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. Okay. Does it tell you is there a way to tell what became of a request, whether it was fulfilled or not, what the response was by AstraZeneca? A. I do not know how that was done. Q. Who would know about that? A. That was the Webster system. Q. Who would be knowledgeable about the Webster system on the IS side? A. Steve Aaronson. Q. Now, Compass was also an Oracle-based system?	Page 143	2 3 4 5 6 7 8 9 10 11 12 13 14	copy from one from Touchstone to another database? MR. TORREGROSSA: Objection to form. THE WITNESS: Yes. BY MR. SMITH: Q. To another Oracle database? Would it have to be an Oracle database? A. In my mind it would be. The term how replication would take place is what I'm not sure of. Q. That would be a resource that would be a task for resource?	Page 145
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Okay. Does it tell you is there a way to tell what became of a request, whether it was fulfilled or not, what the response was by AstraZeneca? A. I do not know how that was done. Q. Who would know about that? A. That was the Webster system. Q. Who would be knowledgeable about the Webster system on the IS side? A. Steve Aaronson. Q. Now, Compass was also an Oracle-based system? A. Yes, Oracle database. Q. An Oracle database. Is Touchstone an Oracle database? A. Yes, it is.	Page 143	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	copy from one from Touchstone to another database? MR. TORREGROSSA: Objection to form. THE WITNESS: Yes. BY MR. SMITH: Q. To another Oracle database? Would it have to be an Oracle database? A. In my mind it would be. The term how replication would take place is what I'm not sure of. Q. That would be a resource that would be a task for resource? A. Yes, it would. Q. What sort of graphical interface does Touchstone have, can you describe that for me?	Page 145
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Okay. Does it tell you is there a way to tell what became of a request, whether it was fulfilled or not, what the response was by AstraZeneca? A. I do not know how that was done. Q. Who would know about that? A. That was the Webster system. Q. Who would be knowledgeable about the Webster system on the IS side? A. Steve Aaronson. Q. Now, Compass was also an Oracle-based system? A. Yes, Oracle database. Q. An Oracle database. Is Touchstone an Oracle database? A. Yes, it is. Q. Steve Aaronson is on the IS side of things. Right? A. Yes. Q. And who would his	Page 143	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	copy from one from Touchstone to another database? MR. TORREGROSSA: Objection to form. THE WITNESS: Yes. BY MR. SMITH: Q. To another Oracle database? Would it have to be an Oracle database? A. In my mind it would be. The term how replication would take place is what I'm not sure of. Q. That would be a resource that would be a task for resource? A. Yes, it would. Q. What sort of graphical interface does Touchstone have, can you describe that for me? A. It's a Web-based interface that has drop down buttons for, you know, fixed or structured data and fields for things like entering notes where you	

		D=== 146			5 440
1	the top?	Page 146	1	something?	Page 148
2	A. It's Web-like. There would		2	something? MR. TORREGROSSA: I'm sorry,	
3	not be tabs.		3	I didn't catch that.	
4	Q. So what are the with that		4	BY MR. SMITH:	
5	graphical interface, what are the areas		5	Q. Money to send a doctor to a	
6	that you can go to on that Web-like		6	meeting, request money to do that, to	
7	interface? Can you kind of describe it		7	send the doctor to a CME program?	
8	in general terms for me?		8	· · ·	
9	•		9		
1	•				
10	prescriber list. You can click to create		10	A. No.	
11	an activity. You can click to a		11	Q. So what other sorts of links	
12	prescriber list called contacts. You can		12	are there? We talked about PIR, anything	
13	click to accounts, buildings, you know,		13	else?	
14	business accounts. You could click to		14	A. The adverse event.	
15	Q. Could you explain that to		15	Q. Adverse events?	
16	me, the accounts, you say buildings?		16	A. Yeah. It's a form.	
17	A. When I say "buildings," I		17	Q. How does that work, through	
18	don't mean people. So you may have		18	the Touchstone system?	
19	Q. You mean like a hospital?		19	A. I'm trying to think.	
20	A. Yes, sir.		20	MR. TORREGROSSA: Take your	
21	Q. Okay. Or a managed care		21	time.	
22	account?		22	BY MR. SMITH:	
23	A. Yes.		23	Q. Is it better to ask Mr.	
24	Q. Is that a separate category		24	Kramer about that?	
		Page 147			Page 149
1	from what you described as building?	3	1	A. Mr. who?	
2	A. No.		2	Q. Is it better to ask Mr.	
3	Q. It's in that same portal?		3	Draper about that?	
4	A. It would be the same, yes.		4	A. I want to make sure I know	
5	Q. I'm sorry, I stopped you		5	that you can access the AE form from	
6	there. What other information is on the		6	Touchstone if I say that. The AE form is	
7	graphical interface or options, things		7	available in the tools SalesInsite.	
8	that you can do?		8	That's why I'm making sure I get it	
9	A. There's also a query option.		9	right.	
10			10	Q. What is SalesInsite?	
11	•		11	MR. TORREGROSSA: We went	
	option allow you to do? A. Search in Touchstone for		12	over that before.	
12			13	THE WITNESS: The portal,	
13	the say a doctor.		14		
14	Q. Are there links to other		15	the sales portal information site.	
	applications on that interface?		1	I believe you can access an AE form within Touchstone.	
15	A Vou one de DIDE Vou es-		16		
16	A. You can do PIRs. You can			DV MD CMITU:	
16 17	enter a PIR there.		17	BY MR. SMITH:	
16 17 18	enter a PIR there. Q. How about expenses?		17 18	Q. How is the Touchstone data	
16 17 18 19	enter a PIR there. Q. How about expenses? A. No.		17 18 19	Q. How is the Touchstone data backed up?	
16 17 18 19 20	enter a PIR there. Q. How about expenses? A. No. Q. There is no link for		17 18 19 20	Q. How is the Touchstone data backed up? A. Can you quantify the	
16 17 18 19 20 21	enter a PIR there. Q. How about expenses? A. No. Q. There is no link for expenses?		17 18 19 20 21	Q. How is the Touchstone data backed up? A. Can you quantify the question in terms of	
16 17 18 19 20 21 22	enter a PIR there. Q. How about expenses? A. No. Q. There is no link for expenses? A. Not in the application.		17 18 19 20 21 22	Q. How is the Touchstone data backed up? A. Can you quantify the question in terms of Q. Just making sure that there	
16 17 18 19 20 21	enter a PIR there. Q. How about expenses? A. No. Q. There is no link for expenses?		17 18 19 20 21	Q. How is the Touchstone data backed up? A. Can you quantify the question in terms of	

		Page 150			Page 152
1	A. Touchstone database is		1	number of prescriptions or do you	
2	backed up, a full backup or cold backup		2	mean different? Can you rank them	
3	is done on a weekly basis. And then		3	by what is my question?	
4	daily there are what are referred to as		4	BY MR. SMITH:	
5	hot backups, are done when the system is		5	Q. In terms of their expected	
6	still available.		6	script writing, in terms of there	
7	Q. Who does those backups?		7	might be several things that would go	
8	 A. The backup team in 		8	into that. Let me ask you this. What	
9	Southbury, Connecticut.		9	sorts of data are you aware of that go	
10	Q. Now, the salesmen's laptops,		10	into the ranking of doctors as to whether	
11	how are they synchronized with the		11	it's worthwhile for the sales	
12	Touchstone system? Any time they		12	representative to go spend the time	
13	connect, will they synchronize?		13	visiting with that doctor?	
14	A. They have to click to		14	MR. TORREGROSSA: Objection	
15	synchronize once they connect to the		15	to form.	
16	network.		16	THE WITNESS: They would	M M CHAR
17	Q. How are the salesmen's		17	have targeting information about a	
18	laptops backed up?		18	doctor.	
19	A. The DLO process.		19	BY MR. SMITH:	
20	Q. And they can do that over		20	Q. And where does that	
21	the Web?		21	targeting information come from?	
22	A. Once connected to the		22	A. It is supplied by the	
23	network.		23	targeting performance group.	
24	Q. Who handles training of the		24	Q. Are there links through	
				-	199
		Page 151			Page 153
1	users of the Touchstone system?	Page 151	1	Touchstone to a database that contains	Page 153
1 2	users of the Touchstone system? A. The sales training	Page 151	1 2	Touchstone to a database that contains targeting information?	Page 153
2	A. The sales training	Page 151	2	targeting information?	Page 153
2 3	A. The sales training organization.	Page 151	2	targeting information? A. The targeting information	Page 153
2 3 4	A. The sales training organization. Q. Do you assist in that?	Page 151	2 3 4	targeting information? A. The targeting information would be available in Touchstone.	Page 153
2 3 4 5	A. The sales training organization.Q. Do you assist in that?A. I do not.	Page 151	2 3 4 5	targeting information? A. The targeting information would be available in Touchstone. Q. What sorts of information	Page 153
2 3 4 5 6	A. The sales training organization.Q. Do you assist in that?A. I do not.Q. Who is the database manager	Page 151	2 3 4	targeting information? A. The targeting information would be available in Touchstone.	Page 153
2 3 4 5 6 7	 A. The sales training organization. Q. Do you assist in that? A. I do not. Q. Who is the database manager for Touchstone? 	Page 151	2 3 4 5 6	targeting information? A. The targeting information would be available in Touchstone. Q. What sorts of information are included in that, in the targeting information?	Page 153
2 3 4 5 6 7 8	 A. The sales training organization. Q. Do you assist in that? A. I do not. Q. Who is the database manager for Touchstone? A. The database manager for 	Page 151	2 3 4 5 6 7	targeting information? A. The targeting information would be available in Touchstone. Q. What sorts of information are included in that, in the targeting	Page 153
2 3 4 5 6 7 8 9	A. The sales training organization. Q. Do you assist in that? A. I do not. Q. Who is the database manager for Touchstone? A. The database manager for Touchstone would be Andy Nelson.	Page 151	2 3 4 5 6 7 8	targeting information? A. The targeting information would be available in Touchstone. Q. What sorts of information are included in that, in the targeting information? A. You would have obviously	Page 153
2 3 4 5 6 7 8 9	A. The sales training organization. Q. Do you assist in that? A. I do not. Q. Who is the database manager for Touchstone? A. The database manager for Touchstone would be Andy Nelson. Q. And who does he work for?	Page 151	2 3 4 5 6 7 8	targeting information? A. The targeting information would be available in Touchstone. Q. What sorts of information are included in that, in the targeting information? A. You would have obviously not obviously if they were targeted	Page 153
2 3 4 5 6 7 8 9	A. The sales training organization. Q. Do you assist in that? A. I do not. Q. Who is the database manager for Touchstone? A. The database manager for Touchstone would be Andy Nelson. Q. And who does he work for? A. Ultimately me.	Page 151	2 3 4 5 6 7 8 9	targeting information? A. The targeting information would be available in Touchstone. Q. What sorts of information are included in that, in the targeting information? A. You would have obviously not obviously if they were targeted and if they were for what product a	Page 153
2 3 4 5 6 7 8 9 10	A. The sales training organization. Q. Do you assist in that? A. I do not. Q. Who is the database manager for Touchstone? A. The database manager for Touchstone would be Andy Nelson. Q. And who does he work for? A. Ultimately me. Q. Who was the database manager	Page 151	2 3 4 5 6 7 8 9 10	A. The targeting information would be available in Touchstone. Q. What sorts of information are included in that, in the targeting information? A. You would have obviously not obviously if they were targeted and if they were for what product a doctor may be targeted for. And	Page 153
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		Page 154		Page :	156
1	Q. But the targeting plan can		1	A. Yes.	
2	be accessed by the sales representative,		2	Q. And what is your role there?	
3	the PSS?		3	A. It's in my organization.	
4	A. Yes.		4	Q. And what is the CSTP or	
5	Q. Through Touchstone?		5	describe how it works?	
6	A. Yes.		6	MR. TORREGROSSA: The	
7	Q. And then they could the		7	database?	
8	targeting plan is a database, another		8	MR. SMITH: If it is a	
9	database, I guess, where you can then		9	database.	
10	search for different you can the		10		
11	PSS can search for specific information.			BY MR. SMITH:	
12			11	Q. Is it a database?	
13	Is that the way it works?		12	MR. TORREGROSSA: Or	
14	MR. TORREGROSSA: Objection		13	whatever it is.	
	to form. I think that misstates		14	THE WITNESS: It's a	
15	his testimony.		15	database. And it allows the PSSes	
16	MR. SMITH: I'm not trying		16	to see their targeting information	
17	to misstate it. I'm trying to		17	prior to it being entered into	
18	clarify for myself. Let me		18	Touchstone.	
19	rephrase it.		19	BY MR. SMITH:	
20	BY MR. SMITH:		20	Q. Who is in charge of that?	
21	Q. Is the targeting plan is		21	Who is the owner of the CSTP?	
22	there a link to the targeting plan		22	A. The application?	
23	through Touchstone?		23	Q. Yes.	
24	A. No.		24	A. I am.	
	The second secon				
		Page 155		Page 1	.57
1	Q. Is the targeting plan a tool		1	Q. Who is the business owner?	
2	that is part of Touchstone?		2	Who is the person in the organization for	
3					
ו ט	A. Yes.				
			3	whom you are doing this?	
4	Q. So it's not a separate		3 4	whom you are doing this? A. Targeting performance team.	
4 5	Q. So it's not a separate system. Is that right?		3 4 5	whom you are doing this? A. Targeting performance team. Q. Targeting performance team.	
4 5 6	Q. So it's not a separatesystem. Is that right?A. A targeting information is		3 4 5 6	whom you are doing this? A. Targeting performance team. Q. Targeting performance team. Who is in charge of that, please?	
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4 5 6 7 8 9	Q. So it's not a separate system. Is that right? A. A targeting information is in Touchstone. Q. Is that the only place that that information resides? A. No.		3 4 5 6 7 8 9 10	whom you are doing this? A. Targeting performance team. Q. Targeting performance team. Who is in charge of that, please? A. Mike Forst. Q. So from time to time he might ask you to perform a task? To make a change in the system, he would come to	
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,	Tauchstone, how are they accessing it	Page 158			Page 160
1	Touchstone, how are they accessing it		1	more questions on that, but it's	
2	then?		2	time to stop for lunch.	
3	A. It's an application that		3	MR. TORREGROSSA: Yes.	
4	they connect to from their laptops.		4		
5	Q. Can they run queries through		5	(A recess was taken from	
6	that application?		6	1:11 p.m. to 2:25 p.m.)	
7	 A. They could search in there, 		7		·
8	yes.		8	MR. TORREGROSSA: Mr.	
9	Q. And could you unload or		9	Dowling wanted to clarify	
10	produce the data from that database?		10	one piece of testimony.	
11	MR. TORREGROSSA: Objection		11	BY MR. SMITH:	
12	to form. Incompetent.		12	Q. You are still under oath,	
13	Could we have the question		13	Mr. Dowling.	
14	again?		14	A. Absolutely. That's why I	
15	BY MR. SMITH:		15	wanted to make sure we got that right.	
16	Q. It's whether you can produce	1	16	You used the term "native" format.	!
17	the information that is contained in the		17	Q. Yes.	
18	CSTP?		18	A. I think the question was	
19	MR. TORREGROSSA: Objection		19	related to pulling data out of the table	
1	•		20	in its native format.	
20	to form. I assume you mean		i e		
21	extract?		21	MR. TORREGROSSA: From	
22	MR. SMITH: Extract is maybe		22	Touchstone.	
23	a better term. I'll accept that.		23	THE WITNESS: From	
24	BY MR. SMITH:		24	Touchstone. My reference to yes	
	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Dage 150			Page 161
1	Q. Can you extract that	Page 159	1	you could do that meant if I was	rage 101
1 2	Q. Can you extract that information?		2	pulling the table, there is a	
3			3	table of information, you could	
1			4	pull that table and see it in that	
4	Q. That's an Oracle is that		l	•	
5	an Oracle-based system, also?		5	format. If the question is	
6	A. Yes.		6	related to the front end or the	
7	Q. And how long has that been		7	user interface, reproducing that	
8	around?		8	is the application, that's not the	
9	A. Within Touchstone, since the		9	native form. In other words, the	
10	beginning of the year.		10	data needs to be in the tool to be	
11	Q. Within Touchstone?		11	viewed in its native format in the	
12	 A. Yes. Within usage with 		12	application. Does that make	
13	Touchstone.		13	sense?	
14	Q. Because Touchstone is the		14	BY MR. SMITH:	
15	new system?		15	Q. You're distinguishing	
16	Á. Yes.		16	between the data and the appearance	
17	Q. But was the the CSTP was		17	through the front end?	
18	in use prior to Touchstone then. Right?		18	A. Right. Correct. I just	
19	A. Yes.		19	wanted to make sure it's clear. I	
1 1 2	Q. And how long was it in use		20	referenced, and it may have been my own	
20			121	nead, when you say "harive format," the	
20 21	prior to Touchstone?		21	head, when you say "native format," the	
20 21 22	prior to Touchstone? A. I believe it was 2003.		22	table. There's a table of data and it	
20 21	prior to Touchstone?				

		T		
	Page 162		Page 16	54
1	Q. We're back from lunch. Have	1	who heads the collection of data and	
2	you discussed your testimony with anybody	2	determines the requirements?	
			•	
3	during the lunch hour?	3	A. Yes, that would be the	
4	MR. TORREGROSSA: You can	4	definition I believe that you're asking.	
5	answer that question yes or no.	5	Q. Who within and the person	100 4040
6	THE WITNESS: Yes.	6	within the IS department would be Steve?	Telegram
7	BY MR. SMITH:	7	A. Dupre.	SHAP.
8			•	E SERVICE SERV
	Q. Have you discussed it with	8	Q. Dupre, and on business side	
9	your counsel?	9	it would be finance?	
10	A. Yes.	10	A. Yes. Let me state, I	
11	Q. I'd like to talk to you	11	believe it may be a guy named Mike	
12	about the AZER database. Is that okay?	12	Heriban. Good luck with the spelling.	8078
	•	ľ	, , ,	13
13	A. Sure.	13	H-E-R-I-B-A-N. I don't deal with that	
14	Q. What is the AZER database?	14	group. The IS team doesn't deal with	
15	A. It's the AstraZeneca Expense	15	that finance area, so I'm not 100 percent	
16	Reporting system.	16	sure of it.	
17	Q. Do you have access to a data	17	Q. But you, yourself, are	
18	map for the AZER database? You had	18	familiar with the AZER system?	
L				
19	another term for it. EDR, ERD?	19	A. Yes.	
20	A. I could obtain an ERD.	20	Q. What are the data sources	
21	Entity Relationship Diagram.	21	for the AZER system?	
22	Q. Who would be the person you	22	A. The data sources for the	
23	would go to to would you obtain that	23	AZER system would be the American Express	
24	· · · · · · · · · · · · · · · · · · ·	24	corporate card billing information. The	
24	yourself or would you go to somebody to	27	corporate card bining information.	
				12
				
	Page 16		Page 16	65
1	Page 16. get that data map?	1	information entered by the person	65
	get that data map?	1 .	information entered by the person	65
2	get that data map? A. I would go to somebody else.	1 2	information entered by the person entering an expense report. And the	65
2	get that data map? A. I would go to somebody else. Q. Who would you go to?	1 2 3	information entered by the person entering an expense report. And the attendees list within AZER to pick the	65
2 3 4	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre.	1 2 3 4	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal.	65
2 3 4 5	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca	1 2 3 4 5	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of	65
2 3 4	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre.	1 2 3 4	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in	65
2 3 4 5 6	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca	1 2 3 4 5	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of	65
2 3 4 5 6 7	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca employee? A. Yes.	1 2 3 4 5 6 7	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in	65
2 3 4 5 6 7 8	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca employee? A. Yes. Q. Is he the database	1 2 3 4 5 6 7 8	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in AZER? A. Sure. Date. I use AZER to	655
2 3 4 5 6 7 8	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca employee? A. Yes. Q. Is he the database administrator for AZER?	1 2 3 4 5 6 7 8	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in AZER? A. Sure. Date. I use AZER to file expense reporting. I know it has	65
2 3 4 5 6 7 8 9	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca employee? A. Yes. Q. Is he the database administrator for AZER? A. No.	1 2 3 4 5 6 7 8 9	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in AZER? A. Sure. Date. I use AZER to file expense reporting. I know it has date. I have an expense report name. A	655
2 3 4 5 6 7 8 9 10	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca employee? A. Yes. Q. Is he the database administrator for AZER? A. No. Q. Who is the database	1 2 3 4 5 6 7 8 9 10	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in AZER? A. Sure. Date. I use AZER to file expense reporting. I know it has date. I have an expense report name. A period. Not just a date submitted, but a	655
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2 3 4 5 6 7 8 9 10	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca employee? A. Yes. Q. Is he the database administrator for AZER? A. No. Q. Who is the database	1 2 3 4 5 6 7 8 9 10	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in AZER? A. Sure. Date. I use AZER to file expense reporting. I know it has date. I have an expense report name. A period. Not just a date submitted, but a	655
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2 3 4 5 6 7 8 9 10 11 12 13 14 15	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca employee? A. Yes. Q. Is he the database administrator for AZER? A. No. Q. Who is the database administrator? A. I am not sure who the database administrator would be for AZER. Q. Who would know that?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in AZER? A. Sure. Date. I use AZER to file expense reporting. I know it has date. I have an expense report name. A period. Not just a date submitted, but a period of time it represents. And you can have different categories of expense types, business meal. You can have communications like cell phone. You can	555
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca employee? A. Yes. Q. Is he the database administrator for AZER? A. No. Q. Who is the database administrator? A. I am not sure who the database administrator would be for AZER. Q. Who would know that? A. Steve Dupre. Q. On the business side, who	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in AZER? A. Sure. Date. I use AZER to file expense reporting. I know it has date. I have an expense report name. A period. Not just a date submitted, but a period of time it represents. And you can have different categories of expense types, business meal. You can have communications like cell phone. You can have hotel, things of that nature, what type of expense. You can enter a project	65
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca employee? A. Yes. Q. Is he the database administrator for AZER? A. No. Q. Who is the database administrator? A. I am not sure who the database administrator would be for AZER. Q. Who would know that? A. Steve Dupre. Q. On the business side, who would be the business analyst for AZER?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in AZER? A. Sure. Date. I use AZER to file expense reporting. I know it has date. I have an expense report name. A period. Not just a date submitted, but a period of time it represents. And you can have different categories of expense types, business meal. You can have communications like cell phone. You can have hotel, things of that nature, what type of expense. You can enter a project which to bill it to, it would be related	655
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca employee? A. Yes. Q. Is he the database administrator for AZER? A. No. Q. Who is the database administrator? A. I am not sure who the database administrator would be for AZER. Q. Who would know that? A. Steve Dupre. Q. On the business side, who	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in AZER? A. Sure. Date. I use AZER to file expense reporting. I know it has date. I have an expense report name. A period. Not just a date submitted, but a period of time it represents. And you can have different categories of expense types, business meal. You can have communications like cell phone. You can have hotel, things of that nature, what type of expense. You can enter a project which to bill it to, it would be related to. And you could have if it's not	655
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca employee? A. Yes. Q. Is he the database administrator for AZER? A. No. Q. Who is the database administrator? A. I am not sure who the database administrator would be for AZER. Q. Who would know that? A. Steve Dupre. Q. On the business side, who would be the business analyst for AZER? A. What I know is it would be in the finance department. I'm not sure	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in AZER? A. Sure. Date. I use AZER to file expense reporting. I know it has date. I have an expense report name. A period. Not just a date submitted, but a period of time it represents. And you can have different categories of expense types, business meal. You can have communications like cell phone. You can have hotel, things of that nature, what type of expense. You can enter a project which to bill it to, it would be related to. And you could have if it's not American Express, how it might have been	65
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca employee? A. Yes. Q. Is he the database administrator for AZER? A. No. Q. Who is the database administrator? A. I am not sure who the database administrator would be for AZER. Q. Who would know that? A. Steve Dupre. Q. On the business side, who would be the business analyst for AZER? A. What I know is it would be in the finance department. I'm not sure of the person exactly who would be the	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in AZER? A. Sure. Date. I use AZER to file expense reporting. I know it has date. I have an expense report name. A period. Not just a date submitted, but a period of time it represents. And you can have different categories of expense types, business meal. You can have communications like cell phone. You can have hotel, things of that nature, what type of expense. You can enter a project which to bill it to, it would be related to. And you could have if it's not American Express, how it might have been paid, cash or another charge card type	65
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca employee? A. Yes. Q. Is he the database administrator for AZER? A. No. Q. Who is the database administrator? A. I am not sure who the database administrator would be for AZER. Q. Who would know that? A. Steve Dupre. Q. On the business side, who would be the business analyst for AZER? A. What I know is it would be in the finance department. I'm not sure of the person exactly who would be the business analyst for that tool.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in AZER? A. Sure. Date. I use AZER to file expense reporting. I know it has date. I have an expense report name. A period. Not just a date submitted, but a period of time it represents. And you can have different categories of expense types, business meal. You can have communications like cell phone. You can have hotel, things of that nature, what type of expense. You can enter a project which to bill it to, it would be related to. And you could have if it's not American Express, how it might have been paid, cash or another charge card type thing.	655
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	get that data map? A. I would go to somebody else. Q. Who would you go to? A. Steve Dupre. Q. And he's an AstraZeneca employee? A. Yes. Q. Is he the database administrator for AZER? A. No. Q. Who is the database administrator? A. I am not sure who the database administrator would be for AZER. Q. Who would know that? A. Steve Dupre. Q. On the business side, who would be the business analyst for AZER? A. What I know is it would be in the finance department. I'm not sure of the person exactly who would be the business analyst for that tool.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	information entered by the person entering an expense report. And the attendees list within AZER to pick the attendees in, say, a business meal. Q. Can you give me examples of the types of fields that are available in AZER? A. Sure. Date. I use AZER to file expense reporting. I know it has date. I have an expense report name. A period. Not just a date submitted, but a period of time it represents. And you can have different categories of expense types, business meal. You can have communications like cell phone. You can have hotel, things of that nature, what type of expense. You can enter a project which to bill it to, it would be related to. And you could have if it's not American Express, how it might have been paid, cash or another charge card type thing.	655

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١.	Page 166			Page 168
1	A. Yes, they would.	1	Q. And that training was	
2	Q. So if a sales representative	2	developed by somebody at ExpenseIT or	
3	entertained a doctor in some fashion,	3	somebody at AstraZeneca?	
4	that would be in the AZER database?	4	 A. I believe the training was 	
5	MR. TORREGROSSA: Objection	5	developed as part of the AZER putting	
6	to form.	6	AZER in place by the finance group.	
7	THE WITNESS: If a sales rep	7	Q. Is the AZER system in use	
8	entertained a doctor, yes.	8	currently?	
9	BY MR. SMITH:	9	A. Yes, it is.	
10	Q. And the name of the doctor	10	Q. And it applies to Seroquel,	
11	would be in the database? That would be	11	correct, among other things?	
12	a field?	12	MR. TORREGROSSA: Applies to	
13	A. It would be something they	13	any Seroquel expense report?	
14	would have to enter and select, yes.	14	MR. SMITH: Right, along	
15	Q. Would that be a separate	15		
16	field?		with other products I assume.	
	***	16	THE WITNESS: Yes. All	
17	A. Yes.	17	products, yes.	
18	Q. And would it be some sort of	18	BY MR. SMITH:	
19	field that describes the purpose of the	19	Q. When was the AZER system put	
20	expense?	20	in place?	
21	A. Yes.	21	A. I believe April 2002.	
22	Q. Who are the vendors of the	22	Q. What type of database is it?	
23	AZER system? Who sold it to AstraZeneca?	23	A. I'm not familiar with the	
24	A. I believe the company's name	24	exact database that the AZER system uses.	
		<u> </u>		
	Page 167			Page 169
1	is ExpenseIT.	1	Q. Where is it located	
2	Q. And where are they based?	2	physically?	
3	A. I'm not familiar with where	3	A. It is with I'm not sure	
4	they're based.	4	where that is located. I would have to	
5	Q. Do they maintain anyone on	5	check.	
6	site at AstraZeneca to work with the	6	Q. Somewhere within	
7	program?	7	AstraZeneca?	
8	A. Steve Dupre's group.	8	A. I believe it's hosted by a	
9	Q. But he's an AstraZeneca	9	third party.	
10	employee. Right?	10	Q. What documentation exists in	
	· · ·	11	•	
11	A. Yes.	1	relation to AZER?	
		12	MR. TORREGROSSA: Objection	
12	Q. But the ExpenseIT, do they	4.5	F = 6	
13	have any employees on site at AstraZeneca?	13	to form.	
13 14	have any employees on site at AstraZeneca? A. I'm not aware of anybody	14		
13 14 15	have any employees on site at AstraZeneca? A. I'm not aware of anybody being on site.	14 15	to form. (Interruption.)	
13 14 15 16	have any employees on site at AstraZeneca? A. I'm not aware of anybody being on site. Q. Who would conduct training	14 15 16	 (Interruption.) 	
13 14 15 16 17	have any employees on site at AstraZeneca? A. I'm not aware of anybody being on site. Q. Who would conduct training for the AZER system at AstraZeneca?	14 15 16 17	(Interruption.) (The court reporter read the	
13 14 15 16 17 18	have any employees on site at AstraZeneca? A. I'm not aware of anybody being on site. Q. Who would conduct training	14 15 16 17 18	 (Interruption.) 	
13 14 15 16 17	have any employees on site at AstraZeneca? A. I'm not aware of anybody being on site. Q. Who would conduct training for the AZER system at AstraZeneca?	14 15 16 17	(Interruption.) (The court reporter read the	
13 14 15 16 17 18	have any employees on site at AstraZeneca? A. I'm not aware of anybody being on site. Q. Who would conduct training for the AZER system at AstraZeneca? A. The AZER system training, which is based on my personal experience	14 15 16 17 18	(Interruption.) (The court reporter read the	
13 14 15 16 17 18 19 20	have any employees on site at AstraZeneca? A. I'm not aware of anybody being on site. Q. Who would conduct training for the AZER system at AstraZeneca? A. The AZER system training, which is based on my personal experience having trained it, is going through CBT	14 15 16 17 18 19	(Interruption.) (The court reporter read the pertinent part of the record.)	
13 14 15 16 17 18 19 20 21	have any employees on site at AstraZeneca? A. I'm not aware of anybody being on site. Q. Who would conduct training for the AZER system at AstraZeneca? A. The AZER system training, which is based on my personal experience having trained it, is going through CBT or computer-based training with a	14 15 16 17 18 19 20 21	(Interruption.) (The court reporter read the pertinent part of the record.) BY MR. SMITH: Q. Any written information?	
13 14 15 16 17 18 19 20 21 22	have any employees on site at AstraZeneca? A. I'm not aware of anybody being on site. Q. Who would conduct training for the AZER system at AstraZeneca? A. The AZER system training, which is based on my personal experience having trained it, is going through CBT or computer-based training with a handout, you know, paper that tells you	14 15 16 17 18 19 20 21 22	(Interruption.) (The court reporter read the pertinent part of the record.) BY MR. SMITH: Q. Any written information? MR. TORREGROSSA: Objection	
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		Page 170		Page 172
1	after. Go ahead.		1	A. No, it's not.
2	BY MR. SMITH:		2	Q. How are the two databases
3	Q. Any information in writing		3	related?
4	or available through a Web site that		4	A. ViewPoint would provide the
5	pertains to the system and how it works		5	speakers that have been deemed eligible
6	or how to use it?	•	6	to speak on AstraZeneca's behalf to the
7	A. As I mentioned, it has		7	LectureBureau system.
8	the information I'm aware of is the		8	Q. And then the LectureBureau
9	training documentation which talks about		9	system would be used by whom? Who would
10	how to use it and how to input the		10	be the users of the LectureBureau
11	expenses you are filing.		11	Express?
12	Q. Other than a data map that		12	A. The sales reps and anybody
13	we talked about already, would there be		13	who might engage a speaker as part of
14	any other documentation that would		14	working at AstraZeneca.
15	describe the relationships, how the		15	Q. On ViewPoint, who are the
16	database is structured, what the		16	is there a data map available for
17	relationships are between different		17	ViewPoint, an ERD?
18	fields?		18	A. I believe there is a data
19	A. I believe that would exist.		19	map ERD available for ViewPoint.
20	I would have to check with Steve to		20	Q. Where would you find that?
21	confirm.		21	A. I would call Scott Morgan.
22	Q. ViewPoint, that's an		22	Q. Who is the database
23	AstraZeneca system that you're familiar		23	administrator or manager?
24	with?		24	A. The manager of the system
		D 474		Page 173
	A. Voc	Page 171	1	Page 173
1	A. Yes.	Page 171	1	would be Scott Morgan. He would oversee
2	Q. What is the ViewPoint	Page 171	2	would be Scott Morgan. He would oversee the day to day of that tool.
2 3	Q. What is the ViewPoint system?	Page 171	2	would be Scott Morgan. He would oversee the day to day of that tool. Q. Now, is there a person
2 3 4	Q. What is the ViewPoint system? A. The ViewPoint is a system		2 3 4	would be Scott Morgan. He would oversee the day to day of that tool. Q. Now, is there a person within CISS who we could refer to as a
2 3 4 5	Q. What is the ViewPoint system? A. The ViewPoint is a system used to manage the information related to		2 3 4 5	would be Scott Morgan. He would oversee the day to day of that tool. Q. Now, is there a person within CISS who we could refer to as a business analyst who is distinct from the
2 3 4 5 6	Q. What is the ViewPoint system? A. The ViewPoint is a system used to manage the information related to speakers who speak on AstraZeneca's		2 3 4 5 6	would be Scott Morgan. He would oversee the day to day of that tool. Q. Now, is there a person within CISS who we could refer to as a business analyst who is distinct from the database manager?
2 3 4 5 6 7	Q. What is the ViewPoint system? A. The ViewPoint is a system used to manage the information related to speakers who speak on AstraZeneca's behalf.		2 3 4 5 6 7	would be Scott Morgan. He would oversee the day to day of that tool. Q. Now, is there a person within CISS who we could refer to as a business analyst who is distinct from the database manager? A. Yes.
2 3 4 5 6 7 8	Q. What is the ViewPoint system? A. The ViewPoint is a system used to manage the information related to speakers who speak on AstraZeneca's behalf. Q. How is it different from or		2 3 4 5 6 7 8	would be Scott Morgan. He would oversee the day to day of that tool. Q. Now, is there a person within CISS who we could refer to as a business analyst who is distinct from the database manager? A. Yes. Q. Okay. So the database
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. What is the ViewPoint system? A. The ViewPoint is a system used to manage the information related to speakers who speak on AstraZeneca's behalf. Q. How is it different from or related to LectureBureau Express? A. The LectureBureau Express is the tool by which the sales force can, meaning the PSSes, can select speakers to do an event. Q. And ViewPoint does what? A. It manages the information related to speakers who speak on behalf of AstraZeneca. Q. So are those two databases going to be related, linked to each other? A. Yes. Q. Is the LectureBureau Express		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	would be Scott Morgan. He would oversee the day to day of that tool. Q. Now, is there a person within CISS who we could refer to as a business analyst who is distinct from the database manager? A. Yes. Q. Okay. So the database manager is basically that's the care and feeding of the system. Right? A. Yes. Q. And business analyst, that is the person who heads the collection of data or specifies the requirements, who is getting the work out of the system then, right, getting the product? A. Okay. Describe the business analyst again. Q. The person who heads the who is responsible for the collection of the data that goes into ViewPoint. MR. TORREGROSSA: Do you
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. What is the ViewPoint system? A. The ViewPoint is a system used to manage the information related to speakers who speak on AstraZeneca's behalf. Q. How is it different from or related to LectureBureau Express? A. The LectureBureau Express is the tool by which the sales force can, meaning the PSSes, can select speakers to do an event. Q. And ViewPoint does what? A. It manages the information related to speakers who speak on behalf of AstraZeneca. Q. So are those two databases going to be related, linked to each other? A. Yes.		2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	would be Scott Morgan. He would oversee the day to day of that tool. Q. Now, is there a person within CISS who we could refer to as a business analyst who is distinct from the database manager? A. Yes. Q. Okay. So the database manager is basically that's the care and feeding of the system. Right? A. Yes. Q. And business analyst, that is the person who heads the collection of data or specifies the requirements, who is getting the work out of the system then, right, getting the product? A. Okay. Describe the business analyst again. Q. The person who heads the who is responsible for the collection of the data that goes into ViewPoint. MR. TORREGROSSA: Do you understand the question?

		Page 174		Page 17
1	confused on the question.		1	but on an individual basis. He is
2	BY MR. SMITH:		2	obviously an IT person and doesn't
3	Q. The ViewPoint is a		3	exactly know the speaker process.
4	collection of data. Right?		4	But he can testify to what he
5	A. Yes.		5	knows on an individual basis.
6	Q. And there is somebody who		6	THE WITNESS: My
7	collects the data. Right?		7	understanding is that the speaker
8	MS. RADLIFF: This is		8	is nominated and then an
9	different from data.		9	evaluation is done, I don't know
10	MR. TORREGROSSA: Could we		10	the criteria on which they're
				·
11	have the question again?		11	evaluated.
12			12	BY MR. SMITH:
13	(The court reporter read the		13	Q. Do you know which department
14	pertinent part of the record.)		14	is doing that?
15			15	A. I do not know the
16	BY MR. SMITH:		16	department.
17	Q. Who collects the data that		17	Q. Now, that's on the business
18	goes into ViewPoint?		18	side, then, the collection of that
19	A. Could you help me understand		19	information. Right?
20	what you mean by "collect the data"? I'm		20	A. Yes.
21	sorry.		21	Q. On the IS side, the business
22	Q. Who gets the name of the		22	analyst, who is the person who is
			23	responsible for the system requirements?
23	speakers for the system? The ViewPoint			
24	is a collection of available speakers.		24	A. The IS person who would work
		Page 175		Page 17
1	Dight?	Page 175	1	Page 17
1 2	Right?	Page 175	1 2	with the business to understand what they
2	A. Right. Speakers are	Page 175	2	with the business to understand what they wanted to do would be Eugene Tayam and
2 3	A. Right. Speakers are nominated by the district sales managers.	Page 175	2	with the business to understand what they wanted to do would be Eugene Tayam and Chris Doyle. They are what as I
2 3 4	A. Right. Speakers are nominated by the district sales managers. MR. TORREGROSSA: I thought	Page 175	2 3 4	with the business to understand what they wanted to do would be Eugene Tayam and Chris Doyle. They are what as I mentioned earlier, the client partner
2 3 4 5	A. Right. Speakers are nominated by the district sales managers. MR. TORREGROSSA: I thought your question was how is this	Page 175	2 3 4 5	with the business to understand what they wanted to do would be Eugene Tayam and Chris Doyle. They are what as I mentioned earlier, the client partner side of our organization.
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1	speakers.	Page 178	1	ovample not specifically Coroguel would	Page 180
2	MR. TORREGROSSA: You got		1 2	example, not specifically Seroquel, would	
3	that right. I was not		3	that be an example of an unbranded talk? MR. TORREGROSSA: Objection	
4	understanding I didn't hear the				
5	connection that that has actually		4	to form.	
6	a data point field in ViewPoint.		5 6	THE WITNESS: Yeah, I would	
7	•			call that I've heard that term	
8	I've stated my objection. BY MR. SMITH:		7	referenced like "disease state."	
			8	BY MR. SMITH:	
9	Q. Is there a data field in		9	Q. So if somebody wanted to	
10	ViewPoint for who nominates the person?		10	speak about the disease state of	
11	A. I believe there's a data	·	11	schizophrenia, there is a field in there	
12	field that says you nominated that		12	that would talk about whether they're	
13	person.		13	going to what the topic is, whether	
14	Q. And is there a data field		14	it's going to be a disease state let	
15	for who approves it?		15	me strike that.	
16	A. There would need to be		16	Is there a field for disease	
17	approval and I believe it would be in		17	state?	
18	there, yes.		18	A. I would have to check on	
19	Q. Is there a data field for		19	that.	
20	the qualifications of the speaker?		20	Q. Is there a field for the	
21	A. Yes.		21	Seroquel brand as being a topic?	
22	Q. Is there a data field for		22	A. Yes.	
23	the cost of the speaker?		23	Q. Is there any data coming	
24	A. Yes. There is a data field,		24	from vendors outside of AstraZeneca and	
		Page 179			Page 181
1	when you say "costs " in other words	Page 179	1	aoina into ViewPoint?	Page 181
1 2	when you say "costs," in other words,	Page 179	1 2	going into ViewPoint?	Page 181
2	what they would be paid.	Page 179	2	A. Yes.	Page 181
2 3	what they would be paid. Q. Exactly. Would this include	Page 179	2 3	A. Yes. Q. What type of data?	Page 181
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