

## CONFIDENTIAL

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1 A. In some way it would  
2 describe how the system is related.  
3 Q. Would each of these  
4 databases have a schema?  
5 A. Similarly to the ERD  
6 question, I don't believe every one would  
7 necessarily have a schema.  
8 Q. Is "business analyst" a term  
9 that you would use in connection with  
10 these databases or systems?  
11 A. No.  
12 Q. "Business owner"?  
13 A. Yes.  
14 Q. What does "business owner"  
15 mean to you?  
16 A. The business owner would be  
17 the person who would own the business  
18 that would own the data.  
19 Q. Now, for Touchstone, is that  
20 CISS?  
21 A. We manage and own the system  
22 or the database. The business owns the  
23 data.  
24 Q. You manage the -- CISS

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1 manages the system. Correct?  
2 A. Yes.  
3 Q. And the data is owned by --  
4 for Touchstone, for example, the data is  
5 owned by whom?  
6 A. The business.  
7 Q. The business being  
8 AstraZeneca or the business being  
9 Commercial or what?  
10 A. Commercial.  
11 Q. Is there somebody within  
12 Commercial who directs the development or  
13 changes of Touchstone?  
14 A. Yes.  
15 Q. And who would that person  
16 be?  
17 A. Howard Kaplan.  
18 Q. What kinds of searches can  
19 be done in Touchstone? Is that too broad  
20 a question?  
21 A. I'm confused on the  
22 question.  
23 Q. What are the fields in  
24 Touchstone?

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1 A. There are a lot of fields in  
2 the Touchstone database. I could not  
3 recall all of them.  
4 Q. Could you give me the main  
5 ones?  
6 A. Things related to the call  
7 entry would be things like the product,  
8 message delivered, notes.  
9 Q. The message being what?  
10 A. A product has a set of  
11 messages that you may deliver about the  
12 product.  
13 Q. These would be marketing  
14 messages?  
15 MR. TORREGROSSA: Objection  
16 to form.  
17 THE WITNESS: Yes. There  
18 are messages related to -- they're  
19 allowed to speak about the  
20 product.  
21 BY MR. SMITH:  
22 Q. So these messages would be  
23 promotional materials that have been  
24 approved by AstraZeneca for use in the

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1 field?  
2 MR. TORREGROSSA: Objection  
3 to form.  
4 THE WITNESS: No.  
5 BY MR. SMITH:  
6 Q. Who approves the messages  
7 for use?  
8 A. There's an organization  
9 called PRA is my understanding. It's not  
10 in my area.  
11 Q. PRA is not part of  
12 Commercial?  
13 A. It's not part of Commercial  
14 from my understanding, no.  
15 Q. Do you know what PRA stands  
16 for?  
17 A. No.  
18 Q. Who would be knowledgeable  
19 about PRA?  
20 A. I am not familiar with who  
21 would lead that.  
22 Q. Can you output data from  
23 Touchstone in a native format?  
24 A. Yes.

24 (Pages 90 to 93)

1 Q. What would be the native  
 2 format for that?  
 3 A. Define "native."  
 4 Q. Actually I was trying to ask  
 5 you about how -- how you would use the  
 6 term "native" in connection with  
 7 Touchstone, in relation to Touchstone?  
 8 A. A native format would be the  
 9 manner in which it was producing it --  
 10 displaying it in the same way it was  
 11 being entered.  
 12 Q. It would be the manner in  
 13 which it's displayed. Right?  
 14 A. Yes.  
 15 Q. And the data could be  
 16 displayed in other formats as well, could  
 17 it not, from Touchstone?  
 18 A. The data in the application  
 19 is displayed in the application in the  
 20 format in which it was entered.  
 21 Q. And if you looked at the  
 22 data in the native format, would you  
 23 require the software, the Touchstone  
 24 software, to be able to view it?

1 A. Yes.  
 2 Q. Could that same data be  
 3 outputted in a format that would be  
 4 viewable without the software?  
 5 A. Yes.  
 6 Q. What types of formats could  
 7 it be outputted in?  
 8 A. Depending on the size and  
 9 amount, it could be a file that is common  
 10 to limited that has a definition to it.  
 11 Q. If its output is common to  
 12 limited, it could be read by most  
 13 commonly available programs such as  
 14 Access?  
 15 A. Yes.  
 16 Q. In connection with the  
 17 production of documents in this case, are  
 18 the contents of Touchstone being produced  
 19 in a native format or some other format?  
 20 MR. TORREGROSSA: Hold on.  
 21 Objection. Could I have the  
 22 question back, please?  
 23 - - -  
 24 (The court reporter read the

1 pertinent part of the record.)  
 2 - - -  
 3 MR. TORREGROSSA: I don't  
 4 think -- as I said, Mr. Dowling is  
 5 not here to talk about the  
 6 production or his involvement in  
 7 the production as a 30(b)(6)  
 8 witness. I don't believe any  
 9 database information has been  
 10 produced. I know we've been in  
 11 discussions about that, but I  
 12 don't think anything has been  
 13 produced yet. That's why --  
 14 that's the source of confusion. I  
 15 don't know how he would know that  
 16 if it hasn't been produced yet.  
 17 BY MR. SMITH:  
 18 Q. Have you -- and this is in  
 19 connection with the capabilities of the  
 20 system or any limitations to the system.  
 21 Have you attempted to collect information  
 22 from the Touchstone system and to output  
 23 it in any format?  
 24 MR. TORREGROSSA: And I

1 object there. You can answer the  
 2 question, but I caution you not to  
 3 reveal any legal requests or legal  
 4 communications as part of the  
 5 answer. But you can answer the  
 6 question.  
 7 THE WITNESS: We have  
 8 provided for business needs the  
 9 information in a summary format on  
 10 total numbers of calls that may be  
 11 generated.  
 12 BY MR. SMITH:  
 13 Q. Total numbers of calls  
 14 indicating -- with what fields that you  
 15 can recall off the top of your head?  
 16 A. Aggregated information by  
 17 selling team, region, district,  
 18 territory. Total calls.  
 19 Q. But not individual call  
 20 information then, is that what you're  
 21 saying?  
 22 A. Correct.  
 23 Q. So they're not talking about  
 24 on such and such a date they went to such

1 and such a doctor and detailed such and  
2 such a product?

3 A. No, sir.

4 Q. But you could do that if you  
5 wanted to. Right?

6 MR. TORREGROSSA: Objection  
7 to form.

8 THE WITNESS: It could be  
9 done.

10 BY MR. SMITH:

11 Q. I mean, you could output the  
12 Touchstone data so that it would provide  
13 data relating to each visit by a sales  
14 representative to any doctor who was  
15 visited. Right?

16 MR. TORREGROSSA: Objection  
17 to form.

18 THE WITNESS: It would be  
19 complex to build what you just  
20 described. It could be done.

21 BY MR. SMITH:

22 Q. You couldn't get a listing  
23 of each doctor who received a sales call  
24 for Seroquel?

1 Right?

2 A. Yes.

3 Q. We understand that. Your  
4 request could cover any field or category  
5 of information that is in the system.  
6 Right?

7 A. Yes.

8 Q. And so you would have fields  
9 that would give you the name and address  
10 of a doctor. Right?

11 A. There are fields that could  
12 hold that information.

13 Q. And you would have fields of  
14 the date of each call on that doctor.  
15 Right?

16 A. Yes.

17 Q. And you would have fields  
18 for the product that was detailed to that  
19 doctor. Right?

20 A. Yes.

21 Q. Would you have fields for  
22 comments from the sales representative  
23 about that visit?

24 A. Yes.

1 MR. TORREGROSSA: We're in  
2 Touchstone still. Right?

3 MR. SMITH: Yes.

4 MR. TORREGROSSA: Objection  
5 to form. You can answer.

6 THE WITNESS: Yes, you  
7 could.

8 BY MR. SMITH:

9 Q. And what format would that  
10 information be in, then, if you outputted  
11 that?

12 A. The format is based on the  
13 request.

14 Q. What data could you put into  
15 a report from Touchstone?

16 MR. TORREGROSSA: Objection  
17 to form.

18 THE WITNESS: The data could  
19 be, depending on what was  
20 requested, explicitly what fields  
21 of information were requested.

22 BY MR. SMITH:

23 Q. To get information out, you  
24 have to make a request or a query.

1 Q. Would you have fields for  
2 professional information requests from  
3 the doctor pertaining to that visit?

4 MR. TORREGROSSA: Pertaining  
5 to that visit?

6 MR. SMITH: To each visit.

7 MR. TORREGROSSA: Objection  
8 to form. Do you understand the  
9 question?

10 THE WITNESS: Yes, I'm  
11 trying to be -- we would have  
12 fields related to the Professional  
13 Information Request. I cannot  
14 tell you if they would be related  
15 directly to a visit to connect  
16 that exactly. I can tell you the  
17 date.

18 BY MR. SMITH:

19 Q. You can tell me the date of  
20 the Professional Information Request?

21 A. Yes.

22 Q. Is there some way that the  
23 system would track what happens to that  
24 PIR?

1 A. The PIR is sent over to the  
 2 Webster system. At that point, I don't  
 3 know what happens to it.  
 4 Q. Does it somehow come back  
 5 from the Webster system? Assuming it's  
 6 fulfilled in medical affairs, does it  
 7 somehow come back into the Touchstone  
 8 system --  
 9 A. No, it doesn't.  
 10 Q. -- to show that -- I'm  
 11 sorry?  
 12 A. To my knowledge, no, it does  
 13 not.  
 14 Q. Would the system show what  
 15 -- to ask it another way, would the  
 16 system show what professional information  
 17 has been given to the doctor, Touchstone?  
 18 A. I do not believe so.  
 19 Q. Would the system show  
 20 whether any samples have been left with  
 21 the doctor?  
 22 A. Yes.  
 23 Q. Would the system show  
 24 whether the doctor requested any samples?

1 A. Yes.  
 2 Q. Would the system show  
 3 whether the doctor was invited to any  
 4 sort of speaking on the -- with regard to  
 5 Seroquel?  
 6 MR. TORREGROSSA: Just a  
 7 clarification. Attend --  
 8 MR. SMITH: Let me rephrase  
 9 it.  
 10 BY MR. SMITH:  
 11 Q. Would the system show if the  
 12 doctor was invited to attend any sort of  
 13 talk or lecture on Seroquel?  
 14 A. It would show information if  
 15 it was input into the system.  
 16 Q. If it was input?  
 17 A. By the PSS.  
 18 Q. Well, would a sales rep  
 19 invite a doctor to a talk and not input  
 20 it into the system?  
 21 A. I don't know -- again,  
 22 that's the habits of the individual. I  
 23 don't know, I would think that they would  
 24 put it in there.

1 Q. Is there a field for whether  
 2 they have been invited to a talk or not?  
 3 A. There's an activity field  
 4 that describes that call, and it may have  
 5 a field about attendance to a program.  
 6 Q. Do you recall what the  
 7 choices are for that field, the entries  
 8 that can be made?  
 9 A. I don't recall.  
 10 Q. For example, if the salesman  
 11 just made a call at the office, there  
 12 would be a descriptor for that?  
 13 A. Right, the ones I do recall  
 14 I know are stand up detail.  
 15 Q. That would be an office  
 16 call?  
 17 A. Yes.  
 18 Q. Stand up detail?  
 19 A. Yes.  
 20 Q. If you took the doctor to  
 21 lunch, what would that be?  
 22 A. That's referred to as a, I  
 23 believe, lunch and learn.  
 24 Q. If he invited the doctor to

1 a convention or to go on some sort of a  
 2 trip, would that be an available entry?  
 3 A. I don't know of an entry  
 4 around that. I can't recall what they  
 5 might be, if there was one.  
 6 Q. If the sales rep provided a  
 7 nice new medical textbook to the doctor,  
 8 would that go into the system somehow?  
 9 A. I believe you could enter  
 10 it.  
 11 Q. But it wouldn't be required  
 12 to?  
 13 A. There is a promotion items  
 14 field. I don't believe we were required  
 15 to enter it.  
 16 Q. So promotional items could  
 17 be medical textbooks, it could also be a  
 18 Seroquel pen?  
 19 A. That is my understanding.  
 20 Q. Would the system have  
 21 information if the doctor was retained as  
 22 a speaker himself or herself?  
 23 A. No.  
 24 Q. Would the system have a

1 field that would cover an adverse event  
 2 reported to the sales rep by the doctor?  
 3 A. The sales rep can submit an  
 4 adverse event form. It's not in the  
 5 system.  
 6 Q. There's no tracking within  
 7 the Touchstone system for a report by the  
 8 doctor of an adverse event?  
 9 A. No. To my knowledge.  
 10 Q. Is there information in the  
 11 Touchstone system about the doctor's  
 12 prescribing habits?  
 13 MR. TORREGROSSA: Objection  
 14 to form.  
 15 THE WITNESS: Define  
 16 "prescribing habits."  
 17 BY MR. SMITH:  
 18 Q. Sales tracking. How many  
 19 prescriptions for Seroquel is he writing  
 20 versus how many prescriptions is he  
 21 writing for Risperdal, say?  
 22 A. Yes.  
 23 Q. That would be in Touchstone?  
 24 A. Yes.

1 prescribing the drug to treat? In other  
 2 words, would it indicate whether he is  
 3 prescribing the drug to treat  
 4 schizophrenia or bipolar mania or bipolar  
 5 depression?  
 6 A. No.  
 7 Q. Is there any system that  
 8 would contain that information in the  
 9 AstraZeneca system?  
 10 A. Let me step back. Unless  
 11 somebody wrote it in the notes.  
 12 MR. TORREGROSSA: Could we  
 13 have the question repeated unless  
 14 you want to restate it?  
 15 MR. SMITH: She can reread  
 16 it or I can.  
 17 BY MR. SMITH:  
 18 Q. The question was, will it  
 19 indicate the condition for which the  
 20 doctor is prescribing the drug to treat?  
 21 Let me ask whether the  
 22 Touchstone database would contain  
 23 diagnosis codes for the patient, which is  
 24 related to a slightly different question?

1 Q. And would it show whether --  
 2 the number of prescriptions he wrote for  
 3 Seroquel in April and the number of  
 4 prescriptions that he wrote for Seroquel  
 5 in March, you know, on a monthly basis?  
 6 A. Yes.  
 7 Q. What other types of  
 8 informational fields can you think of  
 9 that are in Touchstone relating to sales  
 10 calls?  
 11 A. Activity type.  
 12 Q. Is that like a stand up  
 13 detail?  
 14 A. Yes, sir.  
 15 Q. Okay.  
 16 A. The date. The product. The  
 17 message. The notes.  
 18 Q. Will it indicate whether the  
 19 doctor is a family practitioner or a  
 20 psychiatrist?  
 21 A. There is a field that allows  
 22 that, that has the information in it.  
 23 Q. Will it indicate the  
 24 conditions in which the doctor is

1 A. I'm not familiar with the  
 2 diagnosis codes.  
 3 Q. IC-9 uniform system for  
 4 diagnosis for insurance purposes?  
 5 A. I don't recall anything of  
 6 that nature within Touchstone.  
 7 Q. Now, the managed care  
 8 entities, they're tracked in Touchstone  
 9 as well. Right?  
 10 A. The accounts, as I refer to  
 11 them, for managed care, HMO, some of them  
 12 are in Touchstone, yes.  
 13 Q. Medicaid?  
 14 A. Yes.  
 15 MR. TORREGROSSA: You're  
 16 asking if calls to a Medicaid  
 17 individual or employee would be in  
 18 Touchstone? Is that the question?  
 19 MR. SMITH: Yes.  
 20 THE WITNESS: Yes.  
 21 BY MR. SMITH:  
 22 Q. So, for example, if  
 23 AstraZeneca wanted to have Seroquel added  
 24 to the formulary for the State of

1 Pennsylvania, there would be information  
2 concerning that in the Touchstone  
3 database?

4 MR. TORREGROSSA: Objection  
5 to form.

6 THE WITNESS: There would be  
7 formulary information if the State  
8 of Pennsylvania was listed. There  
9 could be formulary information  
10 listed there, yes.

11 BY MR. SMITH:

12 Q. If the president of the  
13 company wanted information from the  
14 Touchstone system, would he go to you or  
15 would he go to Jayne, a resource person?  
16 I'm trying to -- who would he go to to  
17 obtain the information and output a  
18 report from the Touchstone system?

19 A. I don't think he would be  
20 calling me. If there was a request for  
21 information, he would work with the  
22 appropriate IS contact within our group  
23 that could help him who would then make  
24 that same request as I described it to

1 Commercial to get it for him, I assume?

2 A. Yes.

3 Q. And who would that person go  
4 to? Are they doing it directly  
5 themselves or are they going to go to  
6 somebody in CISS to get a report?

7 A. They would go to somebody in  
8 CISS to get the information.

9 Q. So, for example, a sales  
10 representative wouldn't be able to  
11 generate a report from Touchstone him or  
12 herself? So I get some picture of this,  
13 would they have to send a request and  
14 then an IT person, an IS person would  
15 actually do that report for them? Is  
16 that kind of the way it works?

17 A. Help me understand.

18 Q. Sure. If -- a sales rep  
19 uses the Touchstone system. Right?

20 A. Yes.

21 Q. They have it available to  
22 them over the Intranet through their  
23 laptop, I assume. Right?

24 A. Yes.

1 the request system for that information.

2 Q. Would that be a resource  
3 request? We talked about Jayne -- I  
4 forget her last name -- Tomforde, being  
5 head of resources for IS. Is that  
6 something that would go to her division?

7 A. Right. They would send it  
8 to her.

9 Q. To Ms. Tomforde or somebody  
10 in her group?

11 MR. TORREGROSSA: What's the  
12 question?

13 BY MR. SMITH:

14 Q. To obtain data from  
15 Touchstone?

16 A. Who?

17 Q. Anybody. The president of  
18 the company.

19 A. No. The information is  
20 requested through the system. The  
21 president would not go to Jayne. They  
22 would go to the person who would support  
23 them.

24 Q. He would ask somebody in

1 Q. And if they wanted  
2 information about Dr. Jones just before  
3 they went to see him, there's probably  
4 a -- is there a certain amount of  
5 information that they can -- is readily  
6 available to them without going through  
7 anybody else?

8 A. Yes.

9 Q. But if they wanted a more  
10 broad-based report, that would be  
11 something that they might send a request  
12 to an IS person for. Right?

13 A. I'm not sure what you mean  
14 by "broad-based."

15 Q. If they wanted to know -- if  
16 they wanted information about prescribing  
17 trends for all doctors rather than a  
18 particular doctor, if they wanted that  
19 type of information?

20 MR. TORREGROSSA: Objection  
21 to form.

22 BY MR. SMITH:

23 Q. If that makes any sense to  
24 you.

1 A. It kind of doesn't.  
2 Q. There's no point in wasting  
3 time with questions that don't make any  
4 sense.

5 MR. TORREGROSSA: I was  
6 confused, too.

7 BY MR. SMITH:

8 Q. Is sales information in  
9 Touchstone?

10 A. Yes.

11 Q. What types of sales  
12 information would be available through  
13 Touchstone?

14 A. The IMS data information.

15 Q. Is that something that a  
16 sales representative could access  
17 directly himself or herself?

18 A. Yes.

19 Q. If you wanted a report from  
20 IMS, is there another way to get at it  
21 other than through Touchstone?

22 A. Yes.

23 Q. What other systems would  
24 contain IMS data?

1 and provides script level information for  
2 that doctor.

3 Q. I think we're starting to  
4 talk the same things here. I was talking  
5 about a broad-based request earlier, I  
6 was thinking in terms of summaries. I  
7 think we're kind of headed in that  
8 direction. So that's good.

9 You say "script." What do  
10 you mean by "script"?

11 A. RYes.

12 Q. No, I'm sorry, the script  
13 reporting -- what did you say?

14 A. Prescription.

15 Q. So you were talking about  
16 prescriptions.

17 Does the sales  
18 representative in the field have access  
19 to the Touchstone Reporting?

20 A. Yes.

21 Q. And anything that you could  
22 get through Touchstone Reporting could be  
23 outputted into -- let's say printed out,  
24 let's talk about if we wanted to print it

1 A. Touchstone Reporting.

2 Q. How does Touchstone  
3 Reporting differ from what I've been  
4 calling Touchstone, I guess?

5 A. Touchstone Reporting is the  
6 system where the information is provided  
7 around your business area, the rep's  
8 business. So it would contain that IMS  
9 type data that you just described.

10 Q. I'm not sure I understood  
11 your answer. It's probably not your  
12 fault, probably more my fault. I'm  
13 trying to understand how Touchstone  
14 Reporting is different from Touchstone.  
15 I guess maybe we have to say -- if you  
16 can tell me what is Touchstone and then  
17 tell me what is Touchstone Reporting, and  
18 I'll try to understand the difference.

19 A. Touchstone is your sales  
20 force automation tool. It is your data  
21 entry point. It has the information  
22 about your doctor, you know, address and  
23 type of stuff around them. The Reporting  
24 is the tool that summarizes information

1 out, I was trying to think of what --  
2 whether you would have to have the  
3 Touchstone software to view the data or  
4 whether you could put it into a common to  
5 limited file and view it with Access or  
6 something like that?

7 MR. TORREGROSSA: Objection  
8 to form.

9 BY MR. SMITH:

10 Q. Do you understand what I'm  
11 talking about?

12 A. Yeah, I'm not sure which  
13 system.

14 Q. I'm talking about the form  
15 of the output from Touchstone Reporting  
16 and how you would view that data. Let's  
17 say if you wanted to -- if somebody said  
18 I want you to give me all the data in  
19 Touchstone, you would go through -- you  
20 would use Touchstone Reporting as a tool  
21 to do that. Right?

22 MR. TORREGROSSA: You mean  
23 everything that is in the  
24 database?

1 MR. SMITH: Yeah.  
 2 BY MR. SMITH:  
 3 Q. Could you do that with  
 4 Touchstone Reporting, could you give  
 5 somebody all the data that is in the  
 6 Touchstone database?  
 7 A. No.  
 8 Q. What would you use to get at  
 9 the -- all of the data in the Touchstone  
 10 database?  
 11 MR. TORREGROSSA: Objection  
 12 to form. You mean search it, get  
 13 it, search it?  
 14 MR. SMITH: Produce it.  
 15 Search it, get it produced.  
 16 MS. RADLIFF: Export it.  
 17 MR. TORREGROSSA: What would  
 18 you do to export all the data in  
 19 Touchstone?  
 20 MR. SMITH: Sure. Thank  
 21 you.  
 22 THE WITNESS: That would be  
 23 huge. The data is contained in  
 24 the Touchstone database, is where

1 export it in the form of an Access  
 2 spreadsheet?  
 3 MR. TORREGROSSA: And the  
 4 question is still all the data in  
 5 that table?  
 6 MR. SMITH: In one of the  
 7 3,000 tables.  
 8 MR. TORREGROSSA: Could all  
 9 the data in one of those tables be  
 10 put in one spreadsheet?  
 11 MR. SMITH: Yes, could you  
 12 put it in an Access spreadsheet.  
 13 MR. TORREGROSSA: Thank you  
 14 for the clarification. Go ahead.  
 15 THE WITNESS: Depending on  
 16 the table you select. It's the  
 17 amount of information would limit  
 18 you on how much you could put in a  
 19 spreadsheet.  
 20 BY MR. SMITH:  
 21 Q. Access would have a limit as  
 22 to how much data you could put into one  
 23 table. Right?  
 24 A. Yes. The tools you're

1 you would find all the data. That  
 2 would be the only place you would  
 3 find all that data.  
 4 BY MR. SMITH:  
 5 Q. And that is a big table with  
 6 rows and fields. Right?  
 7 A. I believe the count is  
 8 somewhere in like 3,000 tables. It's --  
 9 Q. So each one of those tables  
 10 could be exported then. Right?  
 11 MR. TORREGROSSA: Objection  
 12 to form.  
 13 THE WITNESS: In theory an  
 14 individual table could be  
 15 exported.  
 16 BY MR. SMITH:  
 17 Q. In what formats would it be  
 18 exported? What would you be capable of  
 19 doing in exporting it in one form or  
 20 another? What would be your choices?  
 21 MR. TORREGROSSA: Objection  
 22 to form.  
 23 BY MR. SMITH:  
 24 Q. For example, could you

1 describing would have limits.  
 2 Q. Access -- now, there are  
 3 other tools that can handle more data  
 4 than Access. Right?  
 5 A. Yes.  
 6 Q. So what are some of the --  
 7 what are some of the formats -- let's say  
 8 you have one of the 3,000 tables, it's  
 9 too big to put into an Access database.  
 10 One possibility might be, could you  
 11 output it in terms of common to limited  
 12 data?  
 13 A. Yes.  
 14 Q. And then it would be up to  
 15 the reader to use some type of tool to be  
 16 able to organize it and put it back into  
 17 a table, I guess. Right?  
 18 A. I would assume so, yes.  
 19 Q. And that would be -- that  
 20 would be doable. Right?  
 21 MR. TORREGROSSA: Objection  
 22 to form.  
 23 BY MR. SMITH:  
 24 Q. On your end, you could put



1 it out into a -- you could output it to a  
 2 common to limited file. Right?  
 3 MR. TORREGROSSA: Objection  
 4 to form.  
 5 THE WITNESS: A table of  
 6 data could be exported into a  
 7 common to limited file, yes.  
 8 BY MR. SMITH:  
 9 Q. Now, would there be any sort  
 10 of metadata that would be associated with  
 11 that table, this hypothetical table we're  
 12 talking about?  
 13 MR. TORREGROSSA: In  
 14 Touchstone?  
 15 MR. SMITH: In Touchstone.  
 16 THE WITNESS: Yes.  
 17 BY MR. SMITH:  
 18 Q. What types of data would be  
 19 there?  
 20 A. Data about the data.  
 21 Q. Can you give me some  
 22 examples? Let's say -- let's pick a  
 23 table if you could, just pick one off the  
 24 top of your head out of Touchstone and

1 the deletion of data or anything?  
 2 MR. TORREGROSSA: Objection  
 3 to form.  
 4 THE WITNESS: The Siebel  
 5 system may track an addition to a  
 6 table or a change in that table  
 7 structure. My understanding of  
 8 the Siebel system is you don't  
 9 want to do too much monkeying  
 10 around. It could break it. It's  
 11 not ours.  
 12 BY MR. SMITH:  
 13 Q. Does Siebel provide -- do  
 14 you have access to information from  
 15 Siebel that would tell you how to export  
 16 data?  
 17 A. Yes.  
 18 Q. As part of your contract  
 19 with Siebel, would they -- if you asked  
 20 them to export data for you, would they  
 21 help you do it?  
 22 A. No.  
 23 Q. Would they tell you how to  
 24 do it if you asked them?

1 say we wanted to just pick one?  
 2 A. I couldn't pick an explicit  
 3 table name. If you had a table, it may  
 4 describe --  
 5 Q. A table about something.  
 6 Pick one and say it's about something.  
 7 A. The data may tell you  
 8 something about the field, the size of a  
 9 field, how big it is, how many characters  
 10 of information it may be able to hold,  
 11 the type.  
 12 Q. Would the metadata show  
 13 changes to the table?  
 14 A. What I know is the metadata  
 15 describes the data that is there. I'm  
 16 not sure if there would be information  
 17 about the table structure changes.  
 18 Q. Would it show the last date  
 19 that it was changed so you would know  
 20 whether the table was last changed in  
 21 this year or last year? Some date that  
 22 the last time an entry was made? When I  
 23 say "change," I mean a change in the  
 24 data, that could be the addition of data,

1 A. Yes. I believe they would.  
 2 Q. You haven't talked to them  
 3 about the possibility of outputting data  
 4 from Touchstone, talk to anybody from  
 5 Siebel?  
 6 MR. TORREGROSSA: You can  
 7 answer the question, but in doing  
 8 so, don't reveal any legal  
 9 requests or legal communications  
 10 that were made as part.  
 11 THE WITNESS: I have not  
 12 talked to Siebel about how to do  
 13 that.  
 14 BY MR. SMITH:  
 15 Q. If somebody were to do that,  
 16 would you be the person or somebody else  
 17 from AstraZeneca?  
 18 A. It would be somebody on the  
 19 operations team.  
 20 Q. The operations team being?  
 21 A. Well, it could be somebody  
 22 on the operation team.  
 23 Q. Are you on the operations  
 24 team?

1 A. I'm a leader of it, yes.  
 2 Q. So it would be somebody on  
 3 your team?  
 4 A. It could be, or Jayne's  
 5 team.  
 6 Q. Is the Compass system still  
 7 accessible in its original form on a  
 8 server somewhere?  
 9 MR. TORREGROSSA: Original  
 10 form as in you're able to view it  
 11 as you were when it was in the  
 12 field?  
 13 MR. SMITH: Exactly.  
 14 THE WITNESS: No.  
 15 BY MR. SMITH:  
 16 Q. When was it -- I'm looking  
 17 for a better word than "retired," but not  
 18 when did you stop using it, but when was  
 19 the -- let's say the system dismantled.  
 20 Does that make sense?  
 21 A. 12/31/2006 the system was  
 22 retired.  
 23 Q. Now, only data from 2005  
 24 forward was migrated into Touchstone. Is

1 Q. Now, if you dismantled the  
 2 Compass system, the data is still on the  
 3 server. Right?  
 4 A. Yes.  
 5 Q. So you had that data?  
 6 A. Yes.  
 7 Q. And how would -- for your  
 8 own purposes, if you wanted to export  
 9 that -- if you wanted to search that  
 10 data, how would you do it?  
 11 A. In general you would use a  
 12 database query tool.  
 13 Q. What tool would you use?  
 14 A. There's a tool called Toad  
 15 that allows you to query the database  
 16 directly.  
 17 Q. Is that a commercially  
 18 available program that anybody could buy?  
 19 A. Yes.  
 20 Q. So could you use Toad to  
 21 query the database and generate reports?  
 22 A. You could use Toad to query  
 23 the database, write a SQL statement of  
 24 information you're asking about to

1 that correct?  
 2 A. Correct.  
 3 Q. So for data prior to 2005,  
 4 before you dismantled the system, was the  
 5 data exported in any format?  
 6 A. The database exists in the  
 7 same format. The system --  
 8 Q. It's my fault. It's not  
 9 your fault. I'm not following you, but  
 10 it's not your fault, it's my fault.  
 11 MS. RADLIFF: If I could  
 12 help here.  
 13 MR. SMITH: Whisper in my  
 14 ear. Between us we'll get there.  
 15 BY MR. SMITH:  
 16 Q. So the Compass system would  
 17 be what you would call the front end, in  
 18 other words, that's the way you would  
 19 look at the data in the database. Right?  
 20 A. You could, yes.  
 21 Q. It's the way you would  
 22 access it, it's the way you would display  
 23 it. Right?  
 24 A. Yes.

1 produce that information, to produce a  
 2 set of data or information -- data  
 3 related to your request, yes.  
 4 Q. Could you use Toad to  
 5 produce the entire database?  
 6 MR. TORREGROSSA: Objection  
 7 to form. Could you use Toad to  
 8 extract the whole database?  
 9 MR. SMITH: To extract it,  
 10 yes.  
 11 MR. TORREGROSSA: The entire  
 12 database?  
 13 MR. SMITH: The entire  
 14 database. The entire Compass  
 15 database.  
 16 THE WITNESS: Yes.  
 17 BY MR. SMITH:  
 18 Q. How long would it take you  
 19 to do that? That's probably what you're  
 20 smiling about.  
 21 A. That would be very complex.  
 22 Q. You'll have to raise your  
 23 voice because the heating and  
 24 air-conditioning just came on and I can't

1 hear you.  
 2 A. It would be very complex.  
 3 It's a very large database. And it would  
 4 take time in understanding of the  
 5 relationships of the tables within the  
 6 database.

7 Q. But you have that  
 8 understanding of the relationships, do  
 9 you not?

10 A. I have a data dictionary  
 11 that tells me the understanding of how  
 12 that all interrelates. It's large.

13 Q. That data dictionary, would  
 14 that be like the ERD for Compass?

15 A. In combination.

16 Q. Would you be the person to  
 17 do that? If AstraZeneca were looking for  
 18 the best person to do that, would you be  
 19 the best person to do that?

20 MR. TORREGROSSA: To what?

21 MR. SMITH: To extract the  
 22 data from the Compass database.

23 THE WITNESS: No, I would  
 24 not.

1 Q. Did I misstate it? If I  
 2 did, it wasn't intentional. Maybe I  
 3 misunderstood what you said. Do you want  
 4 to restate it?

5 A. Yes, please.

6 Q. How far back do you have --  
 7 well, I probably know -- you have data  
 8 back to at least 1997 for Seroquel in the  
 9 Compass database. Right?

10 A. No, I do not.

11 Q. And why not?

12 A. Compass was not a Zeneca  
 13 tool.

14 Q. It was an Astra tool?

15 A. Yes.

16 Q. And Astra and Zeneca merged  
 17 in September of '99 or thereabouts  
 18 approximately?

19 A. Yeah. The merger began in  
 20 1999.

21 Q. So you had information going  
 22 back to sometime in 1999 for Seroquel in  
 23 the Compass database, then. Right?

24 A. Yes.

1 BY MR. SMITH:

2 Q. Who would do that?

3 A. The resources -- the request  
 4 was put in, the resources was more  
 5 skilled in that area.

6 Q. Now, Compass goes back how  
 7 far?

8 MR. TORREGROSSA: The system  
 9 itself?

10 MR. SMITH: Yes.

11 MR. TORREGROSSA: The  
 12 software.

13 BY MR. SMITH:

14 Q. When was Compass placed into  
 15 service? When was it started?

16 A. 1994 is approximate.  
 17 Sometime in 1994. I'm not exactly sure  
 18 what date.

19 Q. So you have data in the  
 20 Compass system going back to 1994 related  
 21 to Seroquel. Right?

22 MR. TORREGROSSA: Objection  
 23 to form. Mischaracterizes.

24 BY MR. SMITH:

1 Q. This would be a sales  
 2 automation tool, data in connection with  
 3 that. Right?

4 A. Yes.

5 Q. Now, for information from  
 6 Zeneca prior to the merger, was there a  
 7 sales automation tool in use?

8 A. Yes.

9 Q. And what was that tool?

10 A. SnapPharma.

11 Q. SnapPharma. Does the  
 12 SnapPharma database exist today?

13 A. The database proper does not  
 14 exist.

15 Q. Does the data exist?

16 A. Some data does exist.

17 Q. Which data exists?

18 A. Data related to calls with  
 19 sampling.

20 Q. Which data relating to  
 21 Seroquel does not exist in SnapPharma?

22 MR. TORREGROSSA: Objection  
 23 to form.

24 BY MR. SMITH:

1 Q. Which data related to  
 2 Seroquel no longer exists?  
 3 A. The tables related -- I  
 4 don't know what tables aren't there.  
 5 There are some tables that were retained.  
 6 Q. Do those tables have  
 7 descriptive names in SnapPharma?  
 8 A. Yes.  
 9 Q. Do you know approximately  
 10 how many tables there are in SnapPharma?  
 11 Is it hundreds, is it thousands?  
 12 A. The SnapPharma database  
 13 doesn't exist.  
 14 Q. Doesn't exist. But the  
 15 tables still exist. Right?  
 16 A. Some of the tables exist.  
 17 Q. Some of the tables exist.  
 18 Okay. We're trying to figure out which  
 19 tables don't exist any longer. Do you  
 20 know which ones don't exist any longer?  
 21 A. I do not.  
 22 Q. So the database is  
 23 incomplete, but you're not sure what it  
 24 does or does not contain. Is that

1 correct?  
 2 A. No.  
 3 Q. Okay. Can you straighten me  
 4 out?  
 5 A. It contains the call data  
 6 and the sample data and the prescribers  
 7 that were in that database.  
 8 Q. A better question would be,  
 9 what other information is not there now  
 10 that used to be there? Let me try it  
 11 again. I'll rephrase the question, it  
 12 would be easier.  
 13 Were you familiar -- are you  
 14 familiar with the SnapPharma database?  
 15 A. I was.  
 16 Q. You were. And it was put  
 17 out of commission when?  
 18 A. During merger.  
 19 Q. During the merger. So  
 20 sometime in 1999?  
 21 A. In 2000.  
 22 Q. In 2000. Up until 2000,  
 23 though, you were familiar with the  
 24 SnapPharma database?

1 A. Yes.  
 2 Q. And do you know what data  
 3 was contained in SnapPharma prior to its  
 4 decommissioning?  
 5 A. I don't recall explicitly  
 6 what was in there.  
 7 Q. Is there anything that you  
 8 can think of other than the sales call  
 9 information and the sampling information  
 10 which you mentioned, is there anything  
 11 else that you would have expected to find  
 12 in there that you either don't think is  
 13 there or you're not sure is there?  
 14 A. The tables of information,  
 15 the ones -- I can't recall what wasn't  
 16 brought forward.  
 17 Q. If you can't remember, you  
 18 can't remember.  
 19 Do you know what happened to  
 20 the information that is not there now?  
 21 A. I do not.  
 22 Q. Have you at any time since  
 23 the -- strike that.  
 24 Was the SnapPharma data

1 migrated to Compass after the merger?  
 2 A. All data from September 1,  
 3 1999 forward.  
 4 Q. And for the information  
 5 prior to September 1, 1999, did it -- it  
 6 simply remained in the SnapPharma  
 7 database, it just wasn't migrated?  
 8 A. Correct.  
 9 Q. And that would have gone  
 10 back to what year, 1994?  
 11 A. Launch.  
 12 Q. Launch. 1997?  
 13 A. Launch of SnapPharma?  
 14 Q. Yes.  
 15 A. 1996.  
 16 MR. TORREGROSSA: I think we  
 17 were confused. Is it data back  
 18 related to Seroquel? Is that the  
 19 question?  
 20 MR. SMITH: Related to  
 21 Seroquel. We might as well limit  
 22 it to Seroquel.  
 23 THE WITNESS: Launch of  
 24 Seroquel.

1 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?  
 10 MR. TORREGROSSA: Objection.  
 11 Compound.  
 12 BY MR. SMITH:  
 13 Q. Would you be able to access  
 14 that data yourself?  
 15 A. No.  
 16 Q. Could you get somebody in  
 17 resources to do it?  
 18 A. Yes.  
 19 Q. Have you attempted to do  
 20 that at any time since 2000?  
 21 MR. TORREGROSSA: You can  
 22 answer the question, but in doing  
 23 so, do not reveal any legal  
 24 request or legal communications

1 Q. And who was the -- who or  
 2 what company designed the SnapPharma  
 3 database?  
 4 A. The company we dealt with  
 5 was called Sales Technologies.  
 6 Q. Where were they out of?  
 7 A. They were based in Atlanta.  
 8 Q. Are they still in existence  
 9 if you know?  
 10 A. I don't believe they are.  
 11 Q. And who in -- who at  
 12 AstraZeneca would be most knowledgeable  
 13 about the SnapPharma database?  
 14 A. Myself and Jay Kent.  
 15 Q. And Jay Kent, who is he?  
 16 A. He's a developer.  
 17 Q. Okay. So we're talking  
 18 about on the IS side. Okay. Fine.  
 19 Mr. Kent still works for  
 20 AstraZeneca?  
 21 A. Yes, he does.  
 22 Q. Did SnapPharma at any time  
 23 contain information pertaining to  
 24 promotional materials?

1 that were made.  
 2 THE WITNESS: Not for a  
 3 business reason.  
 4 BY MR. SMITH:  
 5 Q. Could you use Toad to search  
 6 that data?  
 7 A. I believe so.  
 8 Q. What was the platform for  
 9 SnapPharma?  
 10 A. You mean -- explain what you  
 11 mean by "platform."  
 12 Q. Sure. I guess platform --  
 13 some people use that to mean the server  
 14 and some people use it to mean the  
 15 basic --  
 16 MR. TORREGROSSA: The  
 17 viewing tool.  
 18 BY MR. SMITH:  
 19 Q. Whether it's SQL or Oracle.  
 20 A. I use the term in the form  
 21 of a database, Oracle.  
 22 Q. So SnapPharma was an Oracle  
 23 database?  
 24 A. Yes.

1 A. I can't really recall if  
 2 that was in there.  
 3 MR. TORREGROSSA: You might  
 4 be a little bit more specific and  
 5 that might help. I'm not sure I  
 6 understand the question.  
 7 BY MR. SMITH:  
 8 Q. If I use the term "detail  
 9 piece," is that a term that you're  
 10 familiar with; in other words, a piece of  
 11 literature about Seroquel that you hand  
 12 the doctor?  
 13 A. I can't recall if there was  
 14 the capability of recording something  
 15 like that.  
 16 Q. Do you recall if it had the  
 17 capability of recording sales information  
 18 similar to what IMS does?  
 19 A. SnapPharma, to my  
 20 recollection, did not contain IMS data.  
 21 Q. Do you know if it contained  
 22 any safety data?  
 23 A. To my recollection, it would  
 24 not have contained safety data.

1 Q. Do you know if it contained  
 2 any PIR data?  
 3 A. It did not contain PIR data.  
 4 Q. Now, PIR data is currently  
 5 contained in Touchstone. Is that  
 6 correct?  
 7 A. The record is passed through  
 8 and the record of it passing through.  
 9 Q. The record of a request  
 10 having been made?  
 11 A. Yes.  
 12 Q. Was that true of Compass  
 13 also?  
 14 A. Yes.  
 15 Q. Are you aware of any audits  
 16 of PIRs?  
 17 MR. TORREGROSSA: You can  
 18 answer. Of course, don't reveal  
 19 any legal requests or audits of  
 20 the PIR system. But other than  
 21 that, you can answer the question  
 22 if you understand it.  
 23 THE WITNESS: Can you define  
 24 that?

1 BY MR. SMITH:  
 2 Q. Okay. Does it tell you --  
 3 is there a way to tell what became of a  
 4 request, whether it was fulfilled or not,  
 5 what the response was by AstraZeneca?  
 6 A. I do not know how that was  
 7 done.  
 8 Q. Who would know about that?  
 9 A. That was the Webster system.  
 10 Q. Who would be knowledgeable  
 11 about the Webster system on the IS side?  
 12 A. Steve Aaronson.  
 13 Q. Now, Compass was also an  
 14 Oracle-based system?  
 15 A. Yes, Oracle database.  
 16 Q. An Oracle database. Is  
 17 Touchstone an Oracle database?  
 18 A. Yes, it is.  
 19 Q. Steve Aaronson is on the IS  
 20 side of things. Right?  
 21 A. Yes.  
 22 Q. And who would his  
 23 counterpart be on the business side if  
 24 you recall?

1 A. I don't know.  
 2 Q. I've been talking about  
 3 outputting or exporting and using these  
 4 terms pretty generally. Is there a term  
 5 within the Oracle world unloading data or  
 6 data? Is there such a term, "unloading"?  
 7 A. Unloading?  
 8 Q. Yes.  
 9 A. I'm not familiar with that  
 10 term.  
 11 Q. What does the term  
 12 "replication" mean in relationship to an  
 13 Oracle database, is that a term that you  
 14 would use?  
 15 A. The term "replication" in  
 16 relation to an Oracle database. In my  
 17 mind, that would be replicating  
 18 information between a database.  
 19 Q. From one database to  
 20 another?  
 21 A. Yes.  
 22 Q. Kind of like copying?  
 23 A. Yes.  
 24 Q. You could do that with a

1 database such as Touchstone, you could  
 2 copy from one -- from Touchstone to  
 3 another database?  
 4 MR. TORREGROSSA: Objection  
 5 to form.  
 6 THE WITNESS: Yes.  
 7 BY MR. SMITH:  
 8 Q. To another Oracle database?  
 9 Would it have to be an Oracle database?  
 10 A. In my mind it would be. The  
 11 term -- how replication would take place  
 12 is what I'm not sure of.  
 13 Q. That would be a resource --  
 14 that would be a task for resource?  
 15 A. Yes, it would.  
 16 Q. What sort of graphical  
 17 interface does Touchstone have, can you  
 18 describe that for me?  
 19 A. It's a Web-based interface  
 20 that has drop down buttons for, you know,  
 21 fixed or structured data and fields for  
 22 things like entering notes where you  
 23 could type into it.  
 24 Q. Are there like tabs across

1 the top?  
 2 A. It's Web-like. There would  
 3 not be tabs.  
 4 Q. So what are the -- with that  
 5 graphical interface, what are the areas  
 6 that you can go to on that Web-like  
 7 interface? Can you kind of describe it  
 8 in general terms for me?  
 9 A. You can click to your  
 10 prescriber list. You can click to create  
 11 an activity. You can click to a  
 12 prescriber list called contacts. You can  
 13 click to accounts, buildings, you know,  
 14 business accounts. You could click to --  
 15 Q. Could you explain that to  
 16 me, the accounts, you say buildings?  
 17 A. When I say "buildings," I  
 18 don't mean people. So you may have --  
 19 Q. You mean like a hospital?  
 20 A. Yes, sir.  
 21 Q. Okay. Or a managed care  
 22 account?  
 23 A. Yes.  
 24 Q. Is that a separate category

1 from what you described as building?  
 2 A. No.  
 3 Q. It's in that same portal?  
 4 A. It would be the same, yes.  
 5 Q. I'm sorry, I stopped you  
 6 there. What other information is on the  
 7 graphical interface or options, things  
 8 that you can do?  
 9 A. There's also a query option.  
 10 Q. And what would the query  
 11 option allow you to do?  
 12 A. Search in Touchstone for  
 13 the -- say a doctor.  
 14 Q. Are there links to other  
 15 applications on that interface?  
 16 A. You can do PIRs. You can  
 17 enter a PIR there.  
 18 Q. How about expenses?  
 19 A. No.  
 20 Q. There is no link for  
 21 expenses?  
 22 A. Not in the application.  
 23 Q. How about to -- money to  
 24 send the doctor to a meeting or

1 something?  
 2 MR. TORREGROSSA: I'm sorry,  
 3 I didn't catch that.  
 4 BY MR. SMITH:  
 5 Q. Money to send a doctor to a  
 6 meeting, request money to do that, to  
 7 send the doctor to a CME program?  
 8 A. No.  
 9 Q. Pardon?  
 10 A. No.  
 11 Q. So what other sorts of links  
 12 are there? We talked about PIR, anything  
 13 else?  
 14 A. The adverse event.  
 15 Q. Adverse events?  
 16 A. Yeah. It's a form.  
 17 Q. How does that work, through  
 18 the Touchstone system?  
 19 A. I'm trying to think.  
 20 MR. TORREGROSSA: Take your  
 21 time.  
 22 BY MR. SMITH:  
 23 Q. Is it better to ask Mr.  
 24 Kramer about that?

1 A. Mr. who?  
 2 Q. Is it better to ask Mr.  
 3 Draper about that?  
 4 A. I want to make sure I know  
 5 that you can access the AE form from  
 6 Touchstone if I say that. The AE form is  
 7 available in the tools SalesInsite.  
 8 That's why I'm making sure I get it  
 9 right.  
 10 Q. What is SalesInsite?  
 11 MR. TORREGROSSA: We went  
 12 over that before.  
 13 THE WITNESS: The portal,  
 14 the sales portal information site.  
 15 I believe you can access an  
 16 AE form within Touchstone.  
 17 BY MR. SMITH:  
 18 Q. How is the Touchstone data  
 19 backed up?  
 20 A. Can you quantify the  
 21 question in terms of --  
 22 Q. Just making sure that there  
 23 is another copy of the data somewhere in  
 24 case something happens to the system?

1 A. Touchstone database is  
2 backed up, a full backup or cold backup  
3 is done on a weekly basis. And then  
4 daily there are what are referred to as  
5 hot backups, are done when the system is  
6 still available.

7 Q. Who does those backups?

8 A. The backup team in  
9 Southbury, Connecticut.

10 Q. Now, the salesmen's laptops,  
11 how are they synchronized with the  
12 Touchstone system? Any time they  
13 connect, will they synchronize?

14 A. They have to click to  
15 synchronize once they connect to the  
16 network.

17 Q. How are the salesmen's  
18 laptops backed up?

19 A. The DLO process.

20 Q. And they can do that over  
21 the Web?

22 A. Once connected to the  
23 network.

24 Q. Who handles training of the

1 number of prescriptions or do you  
2 mean different? Can you rank them  
3 by what is my question?

4 BY MR. SMITH:

5 Q. In terms of their expected  
6 script writing, in terms of -- there  
7 might be several things that would go  
8 into that. Let me ask you this. What  
9 sorts of data are you aware of that go  
10 into the ranking of doctors as to whether  
11 it's worthwhile for the sales  
12 representative to go spend the time  
13 visiting with that doctor?

14 MR. TORREGROSSA: Objection  
15 to form.

16 THE WITNESS: They would  
17 have targeting information about a  
18 doctor.

19 BY MR. SMITH:

20 Q. And where does that  
21 targeting information come from?

22 A. It is supplied by the  
23 targeting performance group.

24 Q. Are there links through

1 users of the Touchstone system?

2 A. The sales training  
3 organization.

4 Q. Do you assist in that?

5 A. I do not.

6 Q. Who is the database manager  
7 for Touchstone?

8 A. The database manager for  
9 Touchstone would be Andy Nelson.

10 Q. And who does he work for?

11 A. Ultimately me.

12 Q. Who was the database manager  
13 for Compass?

14 A. Andy Nelson.

15 Q. There might have been more  
16 than one.

17 A. Andy Nelson.

18 Q. How about SnapPharma?

19 A. That, I can't recall who  
20 would be that title.

21 Q. In Touchstone, can you  
22 search for rankings of the doctors in  
23 terms of their prescribing habits?

24 MR. TORREGROSSA: You mean

1 Touchstone to a database that contains  
2 targeting information?

3 A. The targeting information  
4 would be available in Touchstone.

5 Q. What sorts of information  
6 are included in that, in the targeting  
7 information?

8 A. You would have obviously --  
9 not obviously -- if they were targeted  
10 and if they were for what product a  
11 doctor may be targeted for. And  
12 information on how often the PSS would  
13 call on that doctor in the period of  
14 time.

15 Q. Would the prescription data  
16 from IMS factor into the targeting?

17 A. I'm not familiar with how  
18 they create the targeting plan.

19 MR. TORREGROSSA: He can  
20 tell you what is in the system at  
21 the time it gets there, but the  
22 targeting itself may be with  
23 another 30(b)(6) witness.

24 BY MR. SMITH:



1 Q. But the targeting plan can  
2 be accessed by the sales representative,  
3 the PSS?

4 A. Yes.

5 Q. Through Touchstone?

6 A. Yes.

7 Q. And then they could -- the  
8 targeting plan is a database, another  
9 database, I guess, where you can then  
10 search for different -- you can -- the  
11 PSS can search for specific information.  
12 Is that the way it works?

13 MR. TORREGROSSA: Objection  
14 to form. I think that misstates  
15 his testimony.

16 MR. SMITH: I'm not trying  
17 to misstate it. I'm trying to  
18 clarify for myself. Let me  
19 rephrase it.

20 BY MR. SMITH:

21 Q. Is the targeting plan -- is  
22 there a link to the targeting plan  
23 through Touchstone?

24 A. No.

1 A. Yes.

2 Q. And what is your role there?

3 A. It's in my organization.

4 Q. And what is the CSTP or  
5 describe how it works?

6 MR. TORREGROSSA: The  
7 database?

8 MR. SMITH: If it is a  
9 database.

10 BY MR. SMITH:

11 Q. Is it a database?

12 MR. TORREGROSSA: Or  
13 whatever it is.

14 THE WITNESS: It's a  
15 database. And it allows the PSSes  
16 to see their targeting information  
17 prior to it being entered into  
18 Touchstone.

19 BY MR. SMITH:

20 Q. Who is in charge of that?

21 Who is the owner of the CSTP?

22 A. The application?

23 Q. Yes.

24 A. I am.

1 Q. Is the targeting plan a tool  
2 that is part of Touchstone?

3 A. Yes.

4 Q. So it's not a separate  
5 system. Is that right?

6 A. A targeting information is  
7 in Touchstone.

8 Q. Is that the only place that  
9 that information resides?

10 A. No.

11 Q. Where else does it reside?

12 A. The collaborative STP tool.

13 Q. The collaborative STP?

14 A. CSTP.

15 Q. What is CSTP?

16 A. The C is collaborative. I  
17 think it's targeting plan for the T and  
18 the P. And the S, I believe, is  
19 strategic.

20 Q. Is what?

21 A. Strategic.

22 Q. Do you have any  
23 responsibilities for maintaining any  
24 applications or databases for the CSTP?

1 Q. Who is the business owner?

2 Who is the person in the organization for  
3 whom you are doing this?

4 A. Targeting performance team.

5 Q. Targeting performance team.

6 Who is in charge of that, please?

7 A. Mike Forst.

8 Q. So from time to time he  
9 might ask you to perform a task? To make  
10 a change in the system, he would come to  
11 you for that and the way it works?

12 A. He would be able to do that,  
13 yes.

14 Q. And this allows the people  
15 in the targeting performance team or the  
16 sales reps to see this data before it  
17 goes into Touchstone? I'm not sure that  
18 I followed you in other words. You said  
19 that somebody is able to see this  
20 information before it goes into  
21 Touchstone. Who was that?

22 A. The sales teams.

23 Q. The sales teams. How would  
24 they access that? If not through

1 Touchstone, how are they accessing it  
 2 then?  
 3 A. It's an application that  
 4 they connect to from their laptops.  
 5 Q. Can they run queries through  
 6 that application?  
 7 A. They could search in there,  
 8 yes.  
 9 Q. And could you unload or  
 10 produce the data from that database?  
 11 MR. TORREGROSSA: Objection  
 12 to form. Incompetent.  
 13 Could we have the question  
 14 again?  
 15 BY MR. SMITH:  
 16 Q. It's whether you can produce  
 17 the information that is contained in the  
 18 CSTP?  
 19 MR. TORREGROSSA: Objection  
 20 to form. I assume you mean  
 21 extract?  
 22 MR. SMITH: Extract is maybe  
 23 a better term. I'll accept that.  
 24 BY MR. SMITH:

1 more questions on that, but it's  
 2 time to stop for lunch.  
 3 MR. TORREGROSSA: Yes.  
 4 - - -  
 5 (A recess was taken from  
 6 1:11 p.m. to 2:25 p.m.)  
 7 - - -  
 8 MR. TORREGROSSA: Mr.  
 9 Dowling wanted to clarify  
 10 one piece of testimony.  
 11 BY MR. SMITH:  
 12 Q. You are still under oath,  
 13 Mr. Dowling.  
 14 A. Absolutely. That's why I  
 15 wanted to make sure we got that right.  
 16 You used the term "native" format.  
 17 Q. Yes.  
 18 A. I think the question was  
 19 related to pulling data out of the table  
 20 in its native format.  
 21 MR. TORREGROSSA: From  
 22 Touchstone.  
 23 THE WITNESS: From  
 24 Touchstone. My reference to yes

1 Q. Can you extract that  
 2 information?  
 3 A. Yes.  
 4 Q. That's an Oracle -- is that  
 5 an Oracle-based system, also?  
 6 A. Yes.  
 7 Q. And how long has that been  
 8 around?  
 9 A. Within Touchstone, since the  
 10 beginning of the year.  
 11 Q. Within Touchstone?  
 12 A. Yes. Within usage with  
 13 Touchstone.  
 14 Q. Because Touchstone is the  
 15 new system?  
 16 A. Yes.  
 17 Q. But was the -- the CSTP was  
 18 in use prior to Touchstone then. Right?  
 19 A. Yes.  
 20 Q. And how long was it in use  
 21 prior to Touchstone?  
 22 A. I believe it was 2003.  
 23 MR. SMITH: I'm going to  
 24 stop here. I might have a couple

1 you could do that meant if I was  
 2 pulling the table, there is a  
 3 table of information, you could  
 4 pull that table and see it in that  
 5 format. If the question is  
 6 related to the front end or the  
 7 user interface, reproducing that  
 8 is the application, that's not the  
 9 native form. In other words, the  
 10 data needs to be in the tool to be  
 11 viewed in its native format in the  
 12 application. Does that make  
 13 sense?  
 14 BY MR. SMITH:  
 15 Q. You're distinguishing  
 16 between the data and the appearance  
 17 through the front end?  
 18 A. Right. Correct. I just  
 19 wanted to make sure it's clear. I  
 20 referenced, and it may have been my own  
 21 head, when you say "native format," the  
 22 table. There's a table of data and it  
 23 can be presented in its native format of  
 24 the table.

1 Q. We're back from lunch. Have  
2 you discussed your testimony with anybody  
3 during the lunch hour?

4 MR. TORREGROSSA: You can  
5 answer that question yes or no.

6 THE WITNESS: Yes.

7 BY MR. SMITH:

8 Q. Have you discussed it with  
9 your counsel?

10 A. Yes.

11 Q. I'd like to talk to you  
12 about the AZER database. Is that okay?

13 A. Sure.

14 Q. What is the AZER database?

15 A. It's the AstraZeneca Expense  
16 Reporting system.

17 Q. Do you have access to a data  
18 map for the AZER database? You had  
19 another term for it. EDR, ERD?

20 A. I could obtain an ERD.

21 Entity Relationship Diagram.

22 Q. Who would be the person you  
23 would go to to -- would you obtain that  
24 yourself or would you go to somebody to

1 who heads the collection of data and  
2 determines the requirements?

3 A. Yes, that would be the  
4 definition I believe that you're asking.

5 Q. Who within -- and the person  
6 within the IS department would be Steve?

7 A. Dupre.

8 Q. Dupre, and on business side  
9 it would be finance?

10 A. Yes. Let me state, I  
11 believe it may be a guy named Mike  
12 Heriban. Good luck with the spelling.  
13 H-E-R-I-B-A-N. I don't deal with that  
14 group. The IS team doesn't deal with  
15 that finance area, so I'm not 100 percent  
16 sure of it.

17 Q. But you, yourself, are  
18 familiar with the AZER system?

19 A. Yes.

20 Q. What are the data sources  
21 for the AZER system?

22 A. The data sources for the  
23 AZER system would be the American Express  
24 corporate card billing information. The

1 get that data map?

2 A. I would go to somebody else.

3 Q. Who would you go to?

4 A. Steve Dupre.

5 Q. And he's an AstraZeneca  
6 employee?

7 A. Yes.

8 Q. Is he the database  
9 administrator for AZER?

10 A. No.

11 Q. Who is the database  
12 administrator?

13 A. I am not sure who the  
14 database administrator would be for AZER.

15 Q. Who would know that?

16 A. Steve Dupre.

17 Q. On the business side, who  
18 would be the business analyst for AZER?

19 A. What I know is it would be  
20 in the finance department. I'm not sure  
21 of the person exactly who would be the  
22 business analyst for that tool.

23 Q. And by "business analyst,"  
24 that would be the person or department

1 information entered by the person  
2 entering an expense report. And the  
3 attendees list within AZER to pick the  
4 attendees in, say, a business meal.

5 Q. Can you give me examples of  
6 the types of fields that are available in  
7 AZER?

8 A. Sure. Date. I use AZER to  
9 file expense reporting. I know it has  
10 date. I have an expense report name. A  
11 period. Not just a date submitted, but a  
12 period of time it represents. And you  
13 can have different categories of expense  
14 types, business meal. You can have  
15 communications like cell phone. You can  
16 have hotel, things of that nature, what  
17 type of expense. You can enter a project  
18 which to bill it to, it would be related  
19 to. And you could have -- if it's not  
20 American Express, how it might have been  
21 paid, cash or another charge card type  
22 thing.

23 Q. Would entertainment expenses  
24 be included in there?

1 A. Yes, they would.  
 2 Q. So if a sales representative  
 3 entertained a doctor in some fashion,  
 4 that would be in the AZER database?  
 5 MR. TORREGROSSA: Objection  
 6 to form.  
 7 THE WITNESS: If a sales rep  
 8 entertained a doctor, yes.  
 9 BY MR. SMITH:  
 10 Q. And the name of the doctor  
 11 would be in the database? That would be  
 12 a field?  
 13 A. It would be something they  
 14 would have to enter and select, yes.  
 15 Q. Would that be a separate  
 16 field?  
 17 A. Yes.  
 18 Q. And would it be some sort of  
 19 field that describes the purpose of the  
 20 expense?  
 21 A. Yes.  
 22 Q. Who are the vendors of the  
 23 AZER system? Who sold it to AstraZeneca?  
 24 A. I believe the company's name

1 Q. And that training was  
 2 developed by somebody at ExpenseIT or  
 3 somebody at AstraZeneca?  
 4 A. I believe the training was  
 5 developed as part of the AZER -- putting  
 6 AZER in place by the finance group.  
 7 Q. Is the AZER system in use  
 8 currently?  
 9 A. Yes, it is.  
 10 Q. And it applies to Seroquel,  
 11 correct, among other things?  
 12 MR. TORREGROSSA: Applies to  
 13 any Seroquel expense report?  
 14 MR. SMITH: Right, along  
 15 with other products I assume.  
 16 THE WITNESS: Yes. All  
 17 products, yes.  
 18 BY MR. SMITH:  
 19 Q. When was the AZER system put  
 20 in place?  
 21 A. I believe April 2002.  
 22 Q. What type of database is it?  
 23 A. I'm not familiar with the  
 24 exact database that the AZER system uses.

1 is ExpenseIT.  
 2 Q. And where are they based?  
 3 A. I'm not familiar with where  
 4 they're based.  
 5 Q. Do they maintain anyone on  
 6 site at AstraZeneca to work with the  
 7 program?  
 8 A. Steve Dupre's group.  
 9 Q. But he's an AstraZeneca  
 10 employee. Right?  
 11 A. Yes.  
 12 Q. But the ExpenseIT, do they  
 13 have any employees on site at AstraZeneca?  
 14 A. I'm not aware of anybody  
 15 being on site.  
 16 Q. Who would conduct training  
 17 for the AZER system at AstraZeneca?  
 18 A. The AZER system training,  
 19 which is based on my personal experience  
 20 having trained it, is going through CBT  
 21 or computer-based training with a  
 22 handout, you know, paper that tells you  
 23 the fields. So you have a paper and a  
 24 computer-based training.

1 Q. Where is it located  
 2 physically?  
 3 A. It is with -- I'm not sure  
 4 where that is located. I would have to  
 5 check.  
 6 Q. Somewhere within  
 7 AstraZeneca?  
 8 A. I believe it's hosted by a  
 9 third party.  
 10 Q. What documentation exists in  
 11 relation to AZER?  
 12 MR. TORREGROSSA: Objection  
 13 to form.  
 14 - - -  
 15 (Interruption.)  
 16 - - -  
 17 (The court reporter read the  
 18 pertinent part of the record.)  
 19 - - -  
 20 BY MR. SMITH:  
 21 Q. Any written information?  
 22 MR. TORREGROSSA: Objection  
 23 to form. It was a bit general. I  
 24 was trying to see what you were

1 after. Go ahead.  
 2 BY MR. SMITH:  
 3 Q. Any information in writing  
 4 or available through a Web site that  
 5 pertains to the system and how it works  
 6 or how to use it?  
 7 A. As I mentioned, it has --  
 8 the information I'm aware of is the  
 9 training documentation which talks about  
 10 how to use it and how to input the  
 11 expenses you are filing.  
 12 Q. Other than a data map that  
 13 we talked about already, would there be  
 14 any other documentation that would  
 15 describe the relationships, how the  
 16 database is structured, what the  
 17 relationships are between different  
 18 fields?  
 19 A. I believe that would exist.  
 20 I would have to check with Steve to  
 21 confirm.  
 22 Q. ViewPoint, that's an  
 23 AstraZeneca system that you're familiar  
 24 with?

1 A. Yes.  
 2 Q. What is the ViewPoint  
 3 system?  
 4 A. The ViewPoint is a system  
 5 used to manage the information related to  
 6 speakers who speak on AstraZeneca's  
 7 behalf.  
 8 Q. How is it different from or  
 9 related to LectureBureau Express?  
 10 A. The LectureBureau Express is  
 11 the tool by which the sales force can,  
 12 meaning the PSSes, can select speakers to  
 13 do an event.  
 14 Q. And ViewPoint does what?  
 15 A. It manages the information  
 16 related to speakers who speak on behalf  
 17 of AstraZeneca.  
 18 Q. So are those two databases  
 19 going to be related, linked to each  
 20 other?  
 21 A. Yes.  
 22 Q. Is the LectureBureau Express  
 23 a tool that you would use to obtain  
 24 information from ViewPoint?

1 A. No, it's not.  
 2 Q. How are the two databases  
 3 related?  
 4 A. ViewPoint would provide the  
 5 speakers that have been deemed eligible  
 6 to speak on AstraZeneca's behalf to the  
 7 LectureBureau system.  
 8 Q. And then the LectureBureau  
 9 system would be used by whom? Who would  
 10 be the users of the LectureBureau  
 11 Express?  
 12 A. The sales reps and anybody  
 13 who might engage a speaker as part of  
 14 working at AstraZeneca.  
 15 Q. On ViewPoint, who are the --  
 16 is there a data map available for  
 17 ViewPoint, an ERD?  
 18 A. I believe there is a data  
 19 map -- ERD available for ViewPoint.  
 20 Q. Where would you find that?  
 21 A. I would call Scott Morgan.  
 22 Q. Who is the database  
 23 administrator or manager?  
 24 A. The manager of the system

1 would be Scott Morgan. He would oversee  
 2 the day to day of that tool.  
 3 Q. Now, is there a person  
 4 within CISS who we could refer to as a  
 5 business analyst who is distinct from the  
 6 database manager?  
 7 A. Yes.  
 8 Q. Okay. So the database  
 9 manager is basically -- that's the care  
 10 and feeding of the system. Right?  
 11 A. Yes.  
 12 Q. And business analyst, that  
 13 is the person who heads the collection of  
 14 data or specifies the requirements, who  
 15 is getting the work out of the system  
 16 then, right, getting the product?  
 17 A. Okay. Describe the business  
 18 analyst again.  
 19 Q. The person who heads the --  
 20 who is responsible for the collection of  
 21 the data that goes into ViewPoint.  
 22 MR. TORREGROSSA: Do you  
 23 understand the question?  
 24 THE WITNESS: I'm a little

1 confused on the question.  
 2 BY MR. SMITH:  
 3 Q. The ViewPoint is a  
 4 collection of data. Right?  
 5 A. Yes.  
 6 Q. And there is somebody who  
 7 collects the data. Right?  
 8 MS. RADLIFF: This is  
 9 different from data.  
 10 MR. TORREGROSSA: Could we  
 11 have the question again?  
 12 - - -  
 13 (The court reporter read the  
 14 pertinent part of the record.)  
 15 - - -  
 16 BY MR. SMITH:  
 17 Q. Who collects the data that  
 18 goes into ViewPoint?  
 19 A. Could you help me understand  
 20 what you mean by "collect the data"? I'm  
 21 sorry.  
 22 Q. Who gets the name of the  
 23 speakers for the system? The ViewPoint  
 24 is a collection of available speakers.

1 but on an individual basis. He is  
 2 obviously an IT person and doesn't  
 3 exactly know the speaker process.  
 4 But he can testify to what he  
 5 knows on an individual basis.  
 6 THE WITNESS: My  
 7 understanding is that the speaker  
 8 is nominated and then an  
 9 evaluation is done, I don't know  
 10 the criteria on which they're  
 11 evaluated.  
 12 BY MR. SMITH:  
 13 Q. Do you know which department  
 14 is doing that?  
 15 A. I do not know the  
 16 department.  
 17 Q. Now, that's on the business  
 18 side, then, the collection of that  
 19 information. Right?  
 20 A. Yes.  
 21 Q. On the IS side, the business  
 22 analyst, who is the person who is  
 23 responsible for the system requirements?  
 24 A. The IS person who would work

1 Right?  
 2 A. Right. Speakers are  
 3 nominated by the district sales managers.  
 4 MR. TORREGROSSA: I thought  
 5 your question was how is this  
 6 collected to be put into the  
 7 database.  
 8 BY MR. SMITH:  
 9 Q. My question is, who is the  
 10 person primarily responsible for  
 11 collecting the names of the speakers, or  
 12 the division or the department?  
 13 A. There is a department, I  
 14 don't know the specific name of the  
 15 department, that owns that service.  
 16 Q. But it's the district sales  
 17 managers --  
 18 A. They nominate -- my  
 19 understanding is they nominate speakers  
 20 that would be entered into ViewPoint.  
 21 Q. And they nominate them. Who  
 22 approves or rejects the nominations?  
 23 MR. TORREGROSSA: Hold on.  
 24 I'm going to allow this testimony

1 with the business to understand what they  
 2 wanted to do would be Eugene Tayam and  
 3 Chris Doyle. They are what -- as I  
 4 mentioned earlier, the client partner  
 5 side of our organization.  
 6 Q. The business owner or the  
 7 lead person on the business side is --  
 8 you don't know the name, but do you know  
 9 the department?  
 10 A. I don't know the department.  
 11 Q. As far as data sources for  
 12 the ViewPoint database, we mentioned the  
 13 district managers who nominate people.  
 14 What other sources of information go into  
 15 the ViewPoint system?  
 16 MR. TORREGROSSA: Objection  
 17 to form. That misstates his  
 18 testimony. Go ahead.  
 19 BY MR. SMITH:  
 20 Q. Did I misstate your  
 21 testimony?  
 22 MR. SMITH: I think he said  
 23 earlier the district sales  
 24 managers nominate possible

1 speakers.  
 2 MR. TORREGROSSA: You got  
 3 that right. I was not  
 4 understanding -- I didn't hear the  
 5 connection that that has actually  
 6 a data point field in ViewPoint.  
 7 I've stated my objection.  
 8 BY MR. SMITH:  
 9 Q. Is there a data field in  
 10 ViewPoint for who nominates the person?  
 11 A. I believe there's a data  
 12 field that says you nominated that  
 13 person.  
 14 Q. And is there a data field  
 15 for who approves it?  
 16 A. There would need to be  
 17 approval and I believe it would be in  
 18 there, yes.  
 19 Q. Is there a data field for  
 20 the qualifications of the speaker?  
 21 A. Yes.  
 22 Q. Is there a data field for  
 23 the cost of the speaker?  
 24 A. Yes. There is a data field,

1 example, not specifically Seroquel, would  
 2 that be an example of an unbranded talk?  
 3 MR. TORREGROSSA: Objection  
 4 to form.  
 5 THE WITNESS: Yeah, I would  
 6 call that -- I've heard that term  
 7 referenced like "disease state."  
 8 BY MR. SMITH:  
 9 Q. So if somebody wanted to  
 10 speak about the disease state of  
 11 schizophrenia, there is a field in there  
 12 that would talk about whether they're  
 13 going to -- what the topic is, whether  
 14 it's going to be a disease state -- let  
 15 me strike that.  
 16 Is there a field for disease  
 17 state?  
 18 A. I would have to check on  
 19 that.  
 20 Q. Is there a field for the  
 21 Seroquel brand as being a topic?  
 22 A. Yes.  
 23 Q. Is there any data coming  
 24 from vendors outside of AstraZeneca and

1 when you say "costs," in other words,  
 2 what they would be paid.  
 3 Q. Exactly. Would this include  
 4 branded and unbranded speaking?  
 5 MR. TORREGROSSA: Objection  
 6 to form.  
 7 THE WITNESS: My  
 8 understanding is it's the  
 9 speakers -- it contains the  
 10 speakers who speak on behalf of  
 11 AstraZeneca. And, therefore, I  
 12 believe in any capacity.  
 13 BY MR. SMITH:  
 14 Q. And by "branded," we're  
 15 meaning to talk about Seroquel, right,  
 16 the Seroquel brand?  
 17 A. If you say "branded" in this  
 18 conversation, yes, I would say Seroquel.  
 19 Q. Is that a term that you use,  
 20 "branded," or that you're familiar with?  
 21 A. I'm familiar with "brand."  
 22 Q. And then "unbranded" would  
 23 be if AstraZeneca wanted a speaker to  
 24 just talk about schizophrenia, for

1 going into ViewPoint?  
 2 A. Yes.  
 3 Q. What type of data?  
 4 A. Information -- vendors  
 5 provide the training Web site  
 6 information, so how they've been trained,  
 7 and that's fed into ViewPoint.  
 8 Q. How who has been trained?  
 9 A. The speaker.  
 10 Q. So you obtain information  
 11 about the speaker's background from an  
 12 outside vendor?  
 13 A. Yes, the vendor manages that  
 14 for AstraZeneca.  
 15 Q. Is there a field in there  
 16 for a curriculum vitae or CV or resume  
 17 provided by the speaker him or herself?  
 18 A. I understand they have a  
 19 place to store the resume. I believe  
 20 it's located within the ViewPoint system.  
 21 Q. Is there a place within the  
 22 ViewPoint system to store, for example, a  
 23 PowerPoint authored by the speaker?  
 24 MR. TORREGROSSA: Objection