

<p style="text-align: right;">Page 317</p> <p>1 with pricing? 2 MR. TORREGROSSA: Objection. 3 Scope. This is one of the 4 databases covered by Mr. Draper. 5 BY MR. SMITH: 6 Q. You can answer the question 7 if you can. Would you? 8 A. I'm not familiar with AMOS. 9 Q. Are you familiar with a 10 pricing database? 11 MR. TORREGROSSA: Objection 12 to form. 13 THE WITNESS: There is an 14 application called Pricing. I'm 15 not as familiar with the details. 16 BY MR. SMITH: 17 Q. Who is the business owner of 18 that application? 19 A. I'm not familiar with who 20 the exact business owner of that 21 application would be. 22 Q. Who is the business 23 consultant for that within IS, for that 24 application?</p>	<p style="text-align: right;">Page 319</p> <p>1 Oracle database? 2 A. I do not have that 3 information today. 4 MR. TORREGROSSA: Mr. Smith, 5 this area is outside of what Mr. 6 Dowling is here to talk about. If 7 you want to talk to me a little 8 bit more about what you're after, 9 we may be able to provide you some 10 more information. I don't think 11 pricing was ever on the radar 12 screen between the parties. 13 MR. SMITH: We need to know 14 about all of the databases and 15 applications that AstraZeneca uses 16 or used, and two persons have been 17 designated by AstraZeneca to 18 provide information about those. 19 One is Mr. Dowling and the other 20 is Mr. Draper. I don't know if 21 pricing fits within either of Mr. 22 Dowling's or Mr. Draper's 23 bailiwick. And if not, then we 24 would ask that you produce</p>
<p style="text-align: right;">Page 318</p> <p>1 A. The business consultant who 2 may -- there's some recent changes. The 3 client partner in the area that I know 4 would have been Chuck Boohear. 5 Q. Could you spell that last 6 name? 7 A. B-O-O-H-A-R. 8 Q. And you say "client 9 partner," can you explain what client 10 partner means? 11 A. Yes. Client partner would 12 be similar to a business consultant, that 13 would be a manager of an area. They 14 would be the -- they would manage the 15 business consultants. 16 Q. They would be the 17 supervisors of the business consultants? 18 A. Yes. 19 Q. Is there a database manager 20 for the Pricing application? 21 A. If it's an Oracle database, 22 it would be covered by our DBA and most 23 likely Tom McCarthy. 24 Q. Do you know whether it is an</p>	<p style="text-align: right;">Page 320</p> <p>1 somebody else to give us 2 information about that. 3 MR. TORREGROSSA: I'm not 4 agreeing or disagreeing with you. 5 If you give me a little bit more 6 about what you're after, I can 7 take it back to my people and we 8 can talk about it. This hasn't 9 come up between the parties. 10 MR. SMITH: We're going to 11 want to know the same basic 12 information about the Pricing 13 application as we do about the 14 other databases. We want to know 15 what it is, what it's used for and 16 who uses it. 17 MR. TORREGROSSA: And I'm 18 not disagreeing or agreeing with 19 you. 20 MR. SMITH: And how it's 21 linked to other systems. 22 MR. TORREGROSSA: Let's talk 23 after the deposition. 24 MR. SMITH: I'm happy to</p>

1 talk about it later.
2 THE WITNESS: Could we take
3 a quick break?

4 MR. SMITH: Absolutely.
5 - - -

6 (A recess was taken from
7 9:53 a.m. to 10:05 a.m.)
8 - - -

9 BY MR. SMITH:

10 Q. Let's turn to something
11 else. I want to talk about retention
12 policies again. Can you tell me what
13 your retention policy is for e-mail?

14 MR. TORREGROSSA: Objection.
15 Scope. Privilege, work product.
16 You can answer the question with
17 respect to the business company
18 policies on retention of e-mail.

19 THE WITNESS: The retention
20 policies on e-mail are what is
21 called active life, which is as
22 long as you deem that needing to
23 be active. Otherwise, delete it.

24 BY MR. SMITH:

1 Q. I guess I'm trying to say,
2 wouldn't you have to look at each and
3 every e-mail to determine whether the
4 information still had an active life or
5 not?

6 A. I can answer that for me.

7 Q. Yes, sir.

8 A. If I read an e-mail, I may
9 save it for the reference later as a
10 project or something around the project.
11 If I got an e-mail from a colleague that
12 says what are you doing for lunch, I'm
13 not necessarily going to retain that
14 information. It just fills up your
15 e-mail.

16 Q. Assume you don't delete it
17 immediately or the next day, is it ever
18 going to get deleted, the e-mail about
19 the lunch?

20 A. The e-mail system has a
21 limit of how much information is on the
22 server. I will get the nasty gram that
23 says you have too much mail.

24 Q. You're over your limit?

1 Q. And the person who makes the
2 determination as to whether e-mail has an
3 active life or not?

4 A. Is the individual receiving
5 the e-mail.

6 Q. So that means each
7 individual sets his own retention policy
8 for e-mail?

9 MR. TORREGROSSA: Objection
10 to form. Mischaracterizes.

11 THE WITNESS: No, the policy
12 is active life, based on what
13 e-mail you receive and what is
14 contained in it.

15 BY MR. SMITH:

16 Q. I don't understand. How
17 would you determine what the active life
18 is for your e-mails?

19 A. How would I determine that?

20 Q. How would one determine
21 that?

22 A. Based on my experience and
23 -- that is the value of the information
24 in the e-mail in doing my job.

1 A. You're over your limit.
2 That's my opportunity to say get rid of
3 some of this stuff.

4 Q. How often is e-mail backed
5 up as a company policy?

6 A. E-mail is backed up daily,
7 weekly and monthly.

8 Q. How long are those backups
9 retained?

10 A. The backups are retained --
11 they're retained.

12 Q. So you still have e-mail
13 backup, say, from 1997?

14 A. I have e-mail backups --

15 Q. When I say "you," I mean
16 AstraZeneca.

17 A. In this case, AstraZeneca
18 would have e-mail backups from June 2002.

19 Q. And what happened to e-mails
20 prior to June 2002, those backups?

21 A. They would not exist. They
22 had a six-month rotation.

23 Q. Now, do you have the ability
24 to restore those backups?

1 MR. TORREGROSSA: Objection
 2 to form.
 3 THE WITNESS: Yes.
 4 BY MR. SMITH:
 5 Q. Where are they located?
 6 A. The tapes would be -- the
 7 current would be in the Southbury -- the
 8 AstraZeneca data center in Connecticut.
 9 The older tapes would be what I call
 10 boxed and shipped, we use a company
 11 called Iron Mountain to hold them.
 12 Q. Iron Mountain is located in
 13 Wilmington. Correct? They have a
 14 facility in Wilmington, put it that way?
 15 A. They do work for us. It
 16 would make sense they have a facility in
 17 Wilmington.
 18 Q. What sorts of documents do
 19 they store for you besides e-mail?
 20 MR. TORREGROSSA: Iron
 21 Mountain?
 22 MR. SMITH: Iron Mountain.
 23 MR. TORREGROSSA: If you
 24 have knowledge of this, you can

1 Q. How about your retention
 2 policies on data collections?
 3 A. I'm sorry?
 4 Q. For any of the databases
 5 that we've been discussing here that
 6 are -- that you provide support for, your
 7 division provides support for?
 8 MR. TORREGROSSA: The same
 9 instruction. You can discuss this
 10 with any business retention
 11 purposes but not legal.
 12 THE WITNESS: AstraZeneca
 13 has business retention policies.
 14 BY MR. SMITH:
 15 Q. They're written policies?
 16 A. Yes.
 17 Q. Do they -- are there
 18 different policies for each of the
 19 databases we've been discussing or is
 20 there a general policy that covers all of
 21 them or both?
 22 A. Let me look.
 23 MR. TORREGROSSA: Take your
 24 time.

1 answer. This is outside the
 2 scope.
 3 THE WITNESS: I don't have
 4 knowledge around this. How we
 5 deal with Iron Mountain explicitly
 6 on every detail, I don't know.
 7 BY MR. SMITH:
 8 Q. Who would have knowledge
 9 about that, more knowledge about that?
 10 MR. TORREGROSSA: Same
 11 instruction. This is outside the
 12 scope. But if you have knowledge,
 13 you can answer his question.
 14 THE WITNESS: I am not
 15 familiar with the organization
 16 that deals with Iron Mountain and
 17 everything they do for us.
 18 BY MR. SMITH:
 19 Q. Is the AstraZeneca retention
 20 policy for e-mail in -- is it a written
 21 policy?
 22 A. The written policy for
 23 retention in e-mail exists, it's six
 24 months.

1 THE WITNESS: I will speak
 2 more of general policies. I'm not
 3 sure how each may apply on every
 4 system here at this point.
 5 General policies on retention vary
 6 based on my understanding of
 7 regulatory requirements. So if
 8 there's a regulated piece of
 9 information, it would be retained
 10 based on the regulatory
 11 requirements of information.
 12 BY MR. SMITH:
 13 Q. Besides regulatory
 14 requirements, is there a general
 15 AstraZeneca policy regarding the
 16 retention of data?
 17 A. I believe the general policy
 18 would be two years. But it varies, as I
 19 say, e-mails, general policy is six
 20 months.
 21 Q. What systems are in use by
 22 the regulatory affairs department?
 23 MR. TORREGROSSA: Objection.
 24 Scope. That is not what this

1 witness is prepared on.
 2 THE WITNESS: I cannot speak
 3 about the systems.
 4 BY MR. SMITH:
 5 Q. Are any of the systems that
 6 we've been discussing used by regulatory
 7 affairs?
 8 MR. TORREGROSSA: Same
 9 objection. Scope. Take your
 10 time.
 11 The question, again, any of
 12 the systems we talked about used
 13 by the regulatory affairs
 14 department?
 15 MR. SMITH: Yes, sir.
 16 THE WITNESS: I am not aware
 17 of any usage by regulatory affairs
 18 with any of the systems in what I
 19 would call doing their business
 20 job.
 21 BY MR. SMITH:
 22 Q. Would they use Touchstone?
 23 MR. TORREGROSSA: Same
 24 objection.

1 MR. TORREGROSSA: Objection.
 2 Scope. This is outside of his
 3 area of testimony for a 30(b)(6).
 4 You can answer if you know.
 5 THE WITNESS: My
 6 understanding is no. I don't
 7 consider them a customer when I
 8 think about Touchstone.
 9 BY MR. SMITH:
 10 Q. Who would be the person most
 11 knowledgeable about regulatory affairs
 12 systems?
 13 MR. TORREGROSSA: Same
 14 objection. But you can answer
 15 based on your individual
 16 knowledge.
 17 THE WITNESS: I'm not
 18 familiar with who that person
 19 would be.
 20 MR. TORREGROSSA: Is the
 21 question who would be the most
 22 knowledgeable person about each
 23 system or all the systems in
 24 general?

1 THE WITNESS: Not to my
 2 knowledge.
 3 BY MR. SMITH:
 4 Q. Would information used by
 5 the PSSes be approved by somebody in
 6 regulatory affairs?
 7 MR. TORREGROSSA: Objection
 8 to form. Vague.
 9 THE WITNESS: My
 10 understanding of information that
 11 the sales reps would use, the
 12 PSSes, would go through the --
 13 what I referred to yesterday as
 14 the PRA approval process. I think
 15 the RA is regulatory affairs.
 16 BY MR. SMITH:
 17 Q. And P is professional?
 18 A. As I said yesterday, I
 19 wasn't sure exactly the acronym. I
 20 believe it's regulatory affairs is the
 21 RA. I believe P could be professional,
 22 promotional, one or the other.
 23 Q. Would they use -- would PRA
 24 use Touchstone?

1 - - -
 2 (Interruption.)
 3 - - -
 4 BY MR. SMITH:
 5 Q. Who would be the person most
 6 knowledgeable about regulatory affairs
 7 systems?
 8 MR. TORREGROSSA: Again,
 9 this is outside the scope of his
 10 testimony, but I'll allow him to
 11 answer in his individual capacity.
 12 BY MR. SMITH:
 13 Q. Let me ask you another way.
 14 What department would provide IS support
 15 to regulatory affairs?
 16 A. That's where my hesitation,
 17 I'm not sure exactly which group does
 18 that support for regulatory affairs. I
 19 know my group does not.
 20 Q. If somebody from regulatory
 21 affairs had a question about Excel or
 22 something, they were working on a
 23 spreadsheet and had a problem, is there a
 24 help desk within your department that

1 they would contact?
2 MR. TORREGROSSA: Objection.
3 Scope. You can answer.
4 THE WITNESS: There's a help
5 desk for AstraZeneca, which is not
6 mine.
7 BY MR. SMITH:
8 Q. So for Microsoft
9 applications, they would contact --
10 A. Correct.
11 Q. -- the help desk that is
12 operated by your department?
13 A. They would contact the
14 AstraZeneca technology support center.
15 Q. And that's not you? Is that
16 in your department?
17 A. No, it is not.
18 Q. Where is that?
19 A. That physical location?
20 Q. That would be part of the
21 question. Who and where?
22 A. It's the technology support
23 center, what I would call tier one, is
24 the IBM support desk that does the

1 support for AstraZeneca.
2 Q. And then what department are
3 they in?
4 A. They are -- the IT services
5 organization manages that relation.
6 Q. How does your department
7 relate to IT services?
8 A. IT services provides what
9 you call infrastructure support for
10 AstraZeneca as a whole. And when I say
11 "infrastructure," that's like the data
12 center management, the help desk, tier
13 one.
14 Q. So your department is the IS
15 department, CISS?
16 A. I am one of the IS
17 departments, yes.
18 Q. And the IT department is
19 outside of CISS?
20 A. IT services is another IS
21 group, and it's not within CISS.
22 Q. CISS then deals with
23 application software I take it?
24 A. Correct.

1 Q. And IT would deal with the
2 hardware then. Is that correct?
3 A. In general.
4 Q. They would run the servers,
5 right?
6 A. Yes.
7 Q. They would be responsible
8 for common drives, the IT people?
9 A. Yes.
10 Q. And there are common drives
11 that would be used by multiple divisions
12 within AstraZeneca. Correct?
13 A. Please define what you mean
14 by "common drives" a little more clearly.
15 Q. Let's say a drive that
16 contains data and applications and it's
17 accessible by more than one department.
18 Let's say it's accessible -- more than
19 one person. Say it's accessible by
20 somebody in commercial and also
21 accessible by somebody in regulatory
22 affairs?
23 A. My understanding of the
24 question is, is there a server in which

1 there is a shared file space?
2 Q. Let's say for AstraZeneca,
3 are there shared -- are there servers
4 where there are shared file space for
5 AstraZeneca?
6 A. Yes.
7 Q. Across the departments?
8 A. File spaces are managed
9 depending on need.
10 Q. And then within departments
11 are there shared drives that are shared
12 only by persons within that department?
13 A. Yes.
14 Q. Do you handle -- do you
15 provide support for applications that are
16 used on shared drives in Commercial?
17 A. When you say -- when I think
18 of a file share space, that's not an
19 application space.
20 Q. Let's say what is your --
21 what shared file spaces are there for
22 personnel within the commercial
23 department?
24 A. The file share, where you

1 can store documents or data that you may
2 have to share it with others, I couldn't
3 explicitly call out each one, but they
4 would exist and a group would have set up
5 to have access to that information.

6 Q. And a shared file space
7 could contain -- could it contain Excel
8 spreadsheets?

9 A. Yes.

10 Q. Could it contain
11 PowerPoints?

12 A. Yes.

13 Q. Could it contain Word
14 documents?

15 A. Yes.

16 Q. Could it contain collections
17 of data?

18 A. What do you mean by
19 "collections of data"?

20 Q. Like a smaller database, one
21 that we haven't mentioned, other than the
22 main databases that we've been talking
23 about.

24 A. Applications that my group

1 is responsible for managed on application
2 servers, not file servers.

3 Q. Your group is responsible
4 for applications on -- in other words,
5 you maintain the application servers,
6 then, that serve Commercial. Right?

7 A. Yes.

8 Q. Who maintains -- there also
9 would be file servers that would have
10 information on them that would be used by
11 personnel in Commercial. Correct?

12 A. Yes, sir.

13 Q. And then there would be
14 personal PCs or laptops that would be
15 used by personnel in Commercial. Right?

16 A. Correct.

17 Q. So people would use their
18 laptop or PC to access applications on
19 your server or to access file servers.
20 Is that correct?

21 A. Correct.

22 Q. Who would maintain the file
23 servers?

24 A. IT services.

1 Q. IT services. And those
2 would be common drives then within --
3 there would be some common drives on --
4 these file servers would be common drives
5 then within Commercial. Correct? Shared
6 drives?

7 A. Right. There are access
8 restrictions on shared drives.

9 Q. And then there would be
10 other shared drives, for example, that
11 would have the AstraZeneca home page that
12 we talked about, the Intranet site that
13 would be on a file server somewhere that
14 is accessible by everybody in
15 AstraZeneca. Correct?

16 A. It would be on a Web server
17 and accessible via the Web application.

18 Q. Do you know who in IT
19 services is responsible for the file
20 servers for Commercial?

21 A. When you say "responsible,"
22 could you define that, please?

23 Q. The care and feeding of the
24 file servers.

1 A. When you say "care and
2 feeding," when I think about a file
3 server, I look at the physical server
4 location, the server availability, the
5 backups, things of that nature. That's
6 IT services.

7 Q. So they would back up the
8 file servers, not you. Right?

9 A. They back up everything.

10 Q. Who would you call at IT
11 services if you had a question about the
12 file servers?

13 A. If I had a question, I would
14 call Karl Jorgensen to have him find out.

15 Q. How does a different
16 department share common documents?

17 A. How do they share common
18 documents? They could use the file share
19 or send them to each other via e-mail.
20 They could throw them out and hand them
21 to each other.

22 Q. How would sales managers get
23 information to their teams, for example?

24 A. Could be -- actually most --

1 in general, I believe, they would use
 2 e-mail.
 3 Q. And then would they also --
 4 is there also some way to use Touchstone
 5 to sort of post a general message to the
 6 sales force?
 7 A. I do not believe that
 8 capability would exist within Touchstone.
 9 Q. Are there capabilities like
 10 that in some of these other systems that
 11 you support?
 12 A. Not to my knowledge.
 13 Q. Are there bulletin boards in
 14 use by people in the Commercial
 15 department?
 16 A. We have -- the bulletin
 17 board that comes to mind is the home
 18 page, and I think of that in context of
 19 posting a car for sale, something of that
 20 nature. Content management of that,
 21 again, is business driven.
 22 Q. Something that would provide
 23 a common area for discussion of topics
 24 that are of interest to, you know, a

1 an e-room?
 2 A. I make a request to the
 3 e-room administrator.
 4 Q. Who is?
 5 A. A link that sends it to the
 6 e-room administrator.
 7 Q. And who runs that?
 8 MR. TORREGROSSA: Which
 9 department?
 10 BY MR. SMITH:
 11 Q. It's somebody in the IS or
 12 IT department who would maintain and
 13 support those e-rooms?
 14 A. A name that I would know
 15 related to that, whether they do it today
 16 or not, I'm not sure, she did it in the
 17 past. Liz Klingeter, K-L-I-N-G-E-T-E-R.
 18 Q. And what division or
 19 department is she in?
 20 A. I believe that is part of
 21 the SPKS organization.
 22 Q. Would information in those
 23 shared spaces be backed up?
 24 MR. TORREGROSSA: Are we on

1 number of people in the department?
 2 MR. TORREGROSSA: Within
 3 Commercial?
 4 BY MR. SMITH:
 5 Q. The commercial department.
 6 A. When you say "discussion,"
 7 help me?
 8 Q. Bulletin boards, blogs,
 9 anything like that? IMing?
 10 A. Who?
 11 Q. IMing, instant messaging?
 12 A. Of the things that you've
 13 mentioned, the one that would come to
 14 mind would be an e-room.
 15 Q. An e-room?
 16 A. Yes. That's a file -- it is
 17 another project file share space.
 18 Q. Who would be the business
 19 owner of that file share space?
 20 A. Whoever requested an e-room.
 21 Q. There's more than one e-room
 22 I take it?
 23 A. Yes, I have e-rooms.
 24 Q. Who would you go to to get

1 e-rooms?
 2 MR. SMITH: The e-rooms.
 3 THE WITNESS: My
 4 understanding is the e-room
 5 information is backed up.
 6 BY MR. SMITH:
 7 Q. Is there an online training
 8 system within Commercial?
 9 MR. TORREGROSSA: Objection
 10 to the form.
 11 THE WITNESS: Yes.
 12 BY MR. SMITH:
 13 Q. Can you describe it for me?
 14 A. Commercial online training
 15 system is called AZ Academy. It allows
 16 you to take courses that are offered in
 17 their -- and schedule classes and -- you
 18 know, to schedule a class. I believe
 19 there may be online training information
 20 within that also.
 21 Q. Who is the business owner
 22 for that?
 23 A. If I recall, I believe it's
 24 Ed Berger. That's the last name I would

1 associate with that.
 2 Q. Who would be the business
 3 consultant for that?
 4 A. My thought is it may be Sean
 5 Evans. However, I don't know the
 6 mapping.
 7 Q. How long has that system
 8 been around?
 9 A. AZ Academy, I'm going to say
 10 a year, I believe it was 2001. I'm not
 11 sure of the exact date when it came on
 12 line.
 13 Q. Would there be any
 14 documentation for AZ Academy?
 15 MR. TORREGROSSA: Objection
 16 to the form. Vague.
 17 THE WITNESS: I would
 18 believe there would be
 19 documentation. I would have to --
 20 I would not know exactly what.
 21 BY MR. SMITH:
 22 Q. Would there be -- would
 23 there be an ERD for that?
 24 A. What I believe is there most

1 likely is. However, I would have to
 2 check.
 3 Q. What type of software does
 4 it utilize?
 5 A. I could not competently say
 6 the software. I believe the software is
 7 called Sabba, S-A-B-B-A, which is a
 8 training software product.
 9 Q. And who is the vendor?
 10 A. Sabba. When I say "Sabba,"
 11 I use the vendor name. I don't know what
 12 the explicit software name may be.
 13 Q. Do you know where they're
 14 located?
 15 A. I'm not aware of where
 16 they're located.
 17 Q. Where are the servers
 18 located, are they AstraZeneca servers?
 19 A. AZ Academy would be in the
 20 data center, and I believe it would be in
 21 Southbury, Connecticut.
 22 Q. Would persons outside of AZ
 23 be given access to these materials to
 24 your knowledge?

1 A. AZ Academy is an internal
 2 tool.
 3 Q. Would regulatory affairs
 4 personnel have access to it?
 5 MR. TORREGROSSA: Objection.
 6 Scope. Outside this individual's
 7 30(b)(6) testimony. You can
 8 answer based on personal knowledge
 9 if you have any.
 10 THE WITNESS: I'm under the
 11 understanding that anybody could
 12 sign up to an AZ Academy course if
 13 there is room available.
 14 BY MR. SMITH:
 15 Q. Do you maintain some sort of
 16 system for ordering or monitoring
 17 samples?
 18 A. As we mentioned yesterday,
 19 the sample ordering goes through
 20 Northstar or Touchstone now in order to
 21 create the order to send it over to the
 22 safety accountability team.
 23 Q. Would sources for that
 24 information include Lash?

1 A. Who?
 2 MR. TORREGROSSA: Objection
 3 to the form.
 4 BY MR. SMITH:
 5 Q. Are you familiar with Lash?
 6 A. I am not familiar with Lash.
 7 Q. Are you familiar with
 8 McKesson?
 9 MR. TORREGROSSA: Same
 10 objection.
 11 THE WITNESS: McKesson is a
 12 company.
 13 BY MR. SMITH:
 14 Q. Do they provide sampling
 15 data to AstraZeneca?
 16 A. Do they provide -- can you
 17 help me understand the context of what
 18 you mean?
 19 Q. Do they provide sample
 20 services to AstraZeneca?
 21 A. Not to my knowledge.
 22 Q. Is there an outside entity
 23 that takes orders or provides samples of
 24 AstraZeneca products to physicians?

1 A. I don't deal with them
2 directly, but my understanding is the
3 organization that I believe you would be
4 referring to with that question is
5 Phoenix Marketing Group.

6 Q. And do they provide
7 information that feeds into the
8 Touchstone system?

9 A. What I know of the sampling
10 information is the -- and again, the
11 sample -- I call it the sample
12 accountabilities database, provides the
13 information on orders that had been --
14 the fulfillment of orders that are sent
15 from Phoenix. I'm not sure how they
16 intertwine. It's not my area.

17 Q. Is that information
18 contained or accessible through
19 Touchstone?

20 A. Within Touchstone, you have
21 a -- you request the sample order. It is
22 transacted to the sample accountability
23 system. What is provided back is the
24 order status.

1 Q. Where would the spreadsheets
2 be kept by AstraZeneca?

3 A. The ones that I am aware of,
4 that I would know, would be in that
5 SalesInsite reporting, whatever is
6 current. And they're getting old.

7 Q. Where would the raw data be
8 kept?

9 A. With the raw data, I am not
10 sure where the raw data would be kept in
11 terms of what is not current.

12 Q. If someone in Commercial
13 wanted a new or customized report
14 regarding IMS data, how would they go
15 about doing that?

16 A. They could get it from the
17 data warehouse. There would be an
18 analyst who may create that information
19 for them, take that data and make it
20 information.

21 Q. Who would be the -- would
22 there be a person in charge of the
23 analyst? Who would be the head of that?

24 MR. TORREGROSSA: Do we have

1 Q. Some IMS data is available
2 through Touchstone. Is that correct?

3 A. Yes.

4 Q. Where does the IMS data go
5 before it gets into Touchstone?

6 A. The Touchstone Reporting
7 system.

8 Q. How is it handled by the
9 Touchstone Reporting system?

10 A. They have the summarized
11 information and they provide it to
12 Touchstone.

13 Q. Does IMS provide certain
14 types of reports to AstraZeneca?

15 A. They have provided reports,
16 and they would have requested.

17 Q. Do they provide reporting
18 tools to AstraZeneca?

19 A. Help me understand
20 "reporting tool."

21 Q. Or just raw data?

22 A. They have supplied raw data
23 and actually what I would call, when you
24 say reports, spreadsheets.

1 a pending question?

2 BY MR. SMITH:

3 Q. Who would be in charge of
4 the analyst?

5 MR. TORREGROSSA: Who would
6 be in charge of the analyst.
7 Thank you.

8 BY MR. SMITH:

9 Q. Let me ask it another way.
10 Who would be in charge of the data
11 warehouse?

12 A. A data warehouse would fall
13 in my area.

14 Q. So you're in charge?

15 A. I'm in charge of the care
16 and feeding.

17 Q. Who is in charge of the
18 system requirements for the data
19 warehouse?

20 A. In terms of what area?

21 Q. From Commercial -- what
22 types of data are -- well, first of all,
23 tell me what the data warehouse is,
24 please?

1 A. The data warehouse is a
 2 place where data is brought in for
 3 analysis.
 4 Q. Would IMS data be stored in
 5 the data warehouse?
 6 A. Yes.
 7 Q. Raw data?
 8 A. Yes, sir.
 9 Q. And who would determine what
 10 data gets stored on the data warehouse?
 11 A. The Commercial business
 12 would make requirements for that.
 13 Q. And who in Commercial
 14 business would do that?
 15 A. I'm trying to think. I
 16 wouldn't say it was one individual. It
 17 covers different groups and a person that
 18 I might know would be like Mike Forst.
 19 His group may have a request for some
 20 information to be available.
 21 Q. Is the data warehouse a
 22 server or more than one server?
 23 A. It's a server.
 24 Q. Are there any applications

1 what do you call it -- current, current
 2 24, 26 months.
 3 Q. Is there a graphical
 4 interface for the data warehouse?
 5 A. Yes.
 6 MR. TORREGROSSA: Mr. Smith,
 7 when you come to a convenient
 8 point.
 9 MR. SMITH: It's convenient
 10 now. Let's take a short break.
 11 - - -
 12 (A recess occurred 10:57
 13 a.m. to 11:12 a.m.)
 14 - - -
 15 BY MR. SMITH:
 16 Q. If I asked this before, I
 17 apologize. Who manages the systems for
 18 medical affairs?
 19 A. Steve Aaronson. We talked
 20 about him yesterday.
 21 Q. Could you give me a list of
 22 the users for -- authorized users for
 23 Touchstone?
 24 MR. TORREGROSSA: Objection

1 residing on the server?
 2 A. Data warehouse.
 3 Q. Data warehouse is an
 4 application?
 5 A. Yes.
 6 Q. So if you needed a report
 7 of -- if you needed an inventory of all
 8 the data in the data warehouse, who would
 9 you ask for that report?
 10 A. If I wanted a listing of all
 11 the data that would be available in the
 12 warehouse, I would make a request for
 13 that information through our processes we
 14 talked about, and that request would go
 15 to Bob Carroll.
 16 Q. Is the data on the -- in the
 17 data warehouse backed up on a regular
 18 basis?
 19 A. Yes.
 20 Q. What are the retention
 21 policies for that data?
 22 A. The data in the data
 23 warehouse is -- in general it's two
 24 years; 24, 26 months as a rotating --

1 to form. To the extent you're
 2 suggesting we will produce such a
 3 thing, but you can answer the
 4 question.
 5 THE WITNESS: I could create
 6 a list of users authorized to use
 7 Touchstone.
 8 BY MR. SMITH:
 9 Q. You could do that for each
 10 of the databases we've talked about here
 11 today?
 12 A. I believe, based on the
 13 databases we have listed, I could produce
 14 a list of users of those.
 15 Q. What is TimeTrax?
 16 A. TimeTrax is used by the
 17 PSSes and ESMs to record time off and
 18 respectively time on territory.
 19 Q. Is that accessible through
 20 Touchstone?
 21 A. It's accessible through
 22 SalesInsite.
 23 Q. Through SalesInsite?
 24 A. Yes.