## Confidential - Darryl Draper

		Page 118			Page 120
1	question about the business		1	adverse or a known event	
2	process of communicating adverse		2	occurs, that that be communicated	
3	events to safety?		3	to drug safety.	
4	BY MR. SMITH:		4	BY MR. SMITH:	
5	Q. It's about whether there's a		5	Q. So is there a process by	
6	system in place to transmit information		6	which information regarding an adverse	
7	concerning an adverse event from a CRF		7	event reported on a CRF form is	
8			8	transferred to an adverse event report	
1	form to somebody in safety?			•	
9	A. Yes.		9	form?	
10	Q. Okay. Can you describe how		10	MR. TORREGROSSA: Again, I	
11	that would be done?		11	object to the extent it calls for	
12	A. The system is COOL.		12	a business process, but you can	
13	Q. If the CRF form is put into		13	answer it on a technological	
14	AMOS, if the information from the CRF		14	basis.	
15	form is put into AMOS, I thought it was		15	THE WITNESS: COOL you're	
16	not put into COOL; is that inaccurate?		16	referring to the paper case report	
17	I thought it was an		17	form; is that correct?	
18	either/or situation?		18	BY MR. SMITH:	
19	A. It is an either/or.		19	Q. I'm referring to the	
20	Q. So safety's access to		20	information on the paper CRF or the	
21	adverse event information in the CRF		21	information gathered electronically	
			22		
22	forms is only through COOL, or is it			through COOL. Either way it could come	
23	through other systems such as AMOS or		23	into the system, as I understand it, two	
24	CRF/DEN?		24	ways, either by paper or electronically.	
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1		Page 119			Page 121
1	MR TORREGROSSA: I object	Page 119	1	So maybe we'd better break them up and	Page 121
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31 (Pages 118 to 121)

	Page 122			Page 124
1	THE WITNESS: Again, I'm	1	we'll break it up probably.	
2	struggling to to really know	2	But let me ask another	
3	what the business process is. I	3	question. Let's just stop here and ask	
4	know about the architecture and	4	you another question.	
5	the technology for these	5	Would it be possible	
	databases. And that's what I'm	_	•	
6		6	electronically to take the information	
7	most capable and skilled to talk	7	from the data or information from the CRF	
8	about.	8	form and transfer it to an adverse event	
9	BY MR. SMITH:	9	report form?	
10	Q. Isn't access to a system	10	MR. TORREGROSSA: Let me	
11	part of the architecture and technology,	11	interpose a scope objection there.	
12	who has access to it, who can use it?	12	I think we're really starting to	
13	A. No, not necessarily.	13	get into business process and drug	
14	Q. Wouldn't you know for most	14	safety questions. But I will	
15	of the systems that you are responsible	15	allow him to answer to the extent	
16	for who the authorized users are?	16	of his knowledge about the systems	
1				
17	A. Right, yes.	17	and whether that's a possibility.	
18	Q. Would authorized users for	18	MR. SMITH: The pending	
19	the CRF/DEN system include people in drug	19	question is whether it's	
20	safety?	20	technically possible,	
21	A. I don't believe so, no.	21	technologically possible to take	
22	Q. Would people in drug safety	22	the information from one form and	
23	be authorized users of the AMOS system?	23	transfer it to the other form.	
24	A. No.	24	MR. TORREGROSSA: Same	
<u> </u>			18144	
	Page 123			Page 125
1	<b>≠</b>			ruge 120
1	Q. Would they be authorized	1	objection.	1 age 123
	Q. Would they be authorized	1 2	objection. You can answer.	1090 120
2	Q. Would they be authorized users of the COOL system?	2	You can answer.	10gc 123
2 3	Q. Would they be authorized users of the COOL system? A. No.	2 3	You can answer. THE WITNESS: It's	10gc 123
2 3 4	Q. Would they be authorized users of the COOL system? A. No. Q. Now, those we're kind of	2 3 4	You can answer.  THE WITNESS: It's technologically possible, yes.	10gc 125
2 3 4 5	Q. Would they be authorized users of the COOL system? A. No. Q. Now, those we're kind of talking about looking back from drug	2 3 4 5	You can answer. THE WITNESS: It's technologically possible, yes. BY MR. SMITH:	14gc 125
2 3 4 5 6	Q. Would they be authorized users of the COOL system? A. No. Q. Now, those we're kind of talking about looking back from drug safety to CRF. Okay?	2 3 4 5 6	You can answer. THE WITNESS: It's technologically possible, yes. BY MR. SMITH: Q. Do they do that?	Tuge 123
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. Would they be authorized users of the COOL system?  A. No.  Q. Now, those we're kind of talking about looking back from drug safety to CRF. Okay?  Now let's talk in a take a different aspect of that and talk about whether there's something in the system that you know about that allows the information, from either a paper or an electronically gathered clinical report form, or CRF, to be transferred by somebody in CRF and you can correct me on the you can tell me what the name of that team is, it's probably not CRF, but, you know, the people who are collecting that information, when they see an adverse event, is there an	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	You can answer. THE WITNESS: It's technologically possible, yes. BY MR. SMITH: Q. Do they do that? MR. TORREGROSSA: Same objection, same instruction. BY MR. SMITH: Q. To your knowledge? A. They being? Q. The people who collect the CRF forms, and transfer it to A. I guess well, the people don't do it. The systems would do is the technology. And the technology but you keep going back to people. Q. Okay. A. So I'm struggling to answer	Tuge 125
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Would they be authorized users of the COOL system?  A. No.  Q. Now, those we're kind of talking about looking back from drug safety to CRF. Okay?  Now let's talk in a take a different aspect of that and talk about whether there's something in the system that you know about that allows the information, from either a paper or an electronically gathered clinical report form, or CRF, to be transferred by somebody in CRF and you can correct me on the you can tell me what the name of that team is, it's probably not CRF, but, you know, the people who are collecting that information, when they see an adverse event, is there an electronic method or system in which they take that information and transfer it to an adverse event report form?  And it's a horribly long	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	You can answer.  THE WITNESS: It's technologically possible, yes. BY MR. SMITH: Q. Do they do that? MR. TORREGROSSA: Same objection, same instruction. BY MR. SMITH: Q. To your knowledge? A. They being? Q. The people who collect the CRF forms, and transfer it to A. I guess well, the people don't do it. The systems would do is the technology. And the technology but you keep going back to people. Q. Okay. A. So I'm struggling to answer your question. Q. Let's put it in that framework, because we're talking about technology here.	Tage 125
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Would they be authorized users of the COOL system?  A. No.  Q. Now, those we're kind of talking about looking back from drug safety to CRF. Okay?  Now let's talk in a take a different aspect of that and talk about whether there's something in the system that you know about that allows the information, from either a paper or an electronically gathered clinical report form, or CRF, to be transferred by somebody in CRF and you can correct me on the you can tell me what the name of that team is, it's probably not CRF, but, you know, the people who are collecting that information, when they see an adverse event, is there an electronic method or system in which they take that information and transfer it to an adverse event report form?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	You can answer. THE WITNESS: It's technologically possible, yes. BY MR. SMITH: Q. Do they do that? MR. TORREGROSSA: Same objection, same instruction. BY MR. SMITH: Q. To your knowledge? A. They being? Q. The people who collect the CRF forms, and transfer it to A. I guess well, the people don't do it. The systems would do is the technology. And the technology but you keep going back to people. Q. Okay. A. So I'm struggling to answer your question. Q. Let's put it in that framework, because we're talking about	

1		Page 126			Page 128
1	information gathered from the CRFs and		1	the processes around the transfer	
2	transfer it to an adverse report form?		2	of information from CRFs to drug	
3	A. Which system?		3	safety, and I mean, and how that's	200 200 200 200 200 200 200 200 200 200
4	Q. Any system that you're		4	developed, that's all protocol	
5	familiar with.		5	that's developed by the study	
6	A. Yes.		6	teams, as well the people perhaps	
7	Q. Which system?		7	in drug safety. So I think you're	
8	A. COOL.		8	really crossing the line into	
9	Q. And that information then is		9	business process on drug safety.	
10	transmitted to somebody in drug safety.		10	MR. SMITH: Let's just	
11	Right?		11	restrict the objections to	
12	A. It's not transmitted to		12	objection to form here.	
13	someone in drug safety, no.		13	MR. TORREGROSSA: No.	
14	Q. Where does the	,	14	Because I'm allowed to, because I	
15	information on the where does the		15	can't allow my witness this is	
16	adverse report form go?		16	not a drug safety deposition.	
17	MR. TORREGROSSA: Objection		17	This is an IT deposition. And	
18	to form.		18	we're getting into drug safety way	
19	THE WITNESS: It's sent to		19	more than we should be.	
20	the drug safety system.		20	BY MR. SMITH:	
21	BY MR. SMITH:		21	Q. Mr. Draper, you're here	
22	Q. Okay. People is the problem		22	today to talk about the IS systems as	
23	we're running into here. Right? We want		23	they relate to drug safety. Correct?	
24	to talk about systems, is that what		24	A. Yes.	P-60
-	to talk about systems, is that what		27	A. 163.	
		Page 127			Page 129
1	you're saying?	rage 127	1	Q. All right. And you said	rage 125
2	A. Yes.		2	it's possible, and that it happens with	
3	Q. So you don't know who's		3	some studies, that the data gets	
4	using the system over there, but to your		4	transferred from the CRFs to the drug	
1					
15	knowledge to the best of your knowledge		5	<del>-</del>	
5	knowledge, to the best of your knowledge,		5	safety system through COOL; is that	
6	the information from the CRF form gets		6	safety system through COOL; is that correct?	
6 7	the information from the CRF form gets transferred through COOL to the drug		6 7	safety system through COOL; is that correct?  A. Yes.	
6 7 8	the information from the CRF form gets transferred through COOL to the drug safety system; is that accurate?		6 7 8	safety system through COOL; is that correct?  A. Yes. Q. Okay. And then my question	
6 7 8 9	the information from the CRF form gets transferred through COOL to the drug safety system; is that accurate?  A. Certain studies can be		6 7 8 9	safety system through COOL; is that correct?  A. Yes. Q. Okay. And then my question to follow up on that was, you know,	
6 7 8 9 10	the information from the CRF form gets transferred through COOL to the drug safety system; is that accurate?  A. Certain studies can be configured to transmit adverse event		6 7 8 9	safety system through COOL; is that correct?  A. Yes. Q. Okay. And then my question to follow up on that was, you know, because your answer suggests that that's	
6 7 8 9 10 11	the information from the CRF form gets transferred through COOL to the drug safety system; is that accurate?  A. Certain studies can be configured to transmit adverse event information from an electronic case		6 7 8 9 10 11	safety system through COOL; is that correct?  A. Yes. Q. Okay. And then my question to follow up on that was, you know, because your answer suggests that that's not done all the time, I'm asking you,	
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		Page 130			Page 132
1	If they choose to do it		1	on	
2	electronically, the system will do		2	THE WITNESS: For CRF/DEN?	
3	it. If they don't, then the		3	MR. TORREGROSSA: AMOS we	
4	system won't.		4	were on. I'm sorry, did you	
5	BY MR. SMITH:		5	intentionally go there or were you	
6	Q. I think I understand what		6	meaning to follow down the line?	
	<u> </u>				
7	you're saying.		7	We gave AMOS	
8	The technology exists. It's		8	MR. SMITH: We were actually	
9	in place. Whether they use it or not is		9	going through CRF/DEN. It's just	
10	not your decision. Right?		10	that it was related to AMOS and	
11	A. Correct.		11	COOL.	Ì
12	MR. SMITH: Why don't we		12	MR. TORREGROSSA: I	
13	take a break for lunch.		13	apologize, sir. Go ahead.	
14			14	THE WITNESS: I answered the	
15	(A luncheon recess		15	question with regard to	
16	occurred.)		16	BY MR. SMITH:	
17			17	Q. With regard to AMOS.	
1	MD TODDECDOCCA: If you		1		
18	MR. TORREGROSSA: If you		18	Mr	
19	want to start there, we have some	•	19	A. Brian Bryzniski.	
20	names of people that we did not		20	Q Bryzniski is with regard	
21	have before, if you like.		21	to AMOS. Right?	
22	BY MR. SMITH:		22	A. Right.	
23	Q. Mr. Draper, you had some		23	Q. And who would be the	
24	names of people that we didn't have		24	business owner for CRF/DEN?	
<b></b>			<b></b>		
					. 400
1	hoforo?	Page 131		A I gave that earlier	Page 133
1	before?	Page 131	1	A. I gave that earlier.	Page 133
2	A. Yes. You had questions with	Page 131	2	That's	Page 133
2 3	A. Yes. You had questions with regard to certain systems, the system	Page 131	2	That's Q. Who would be, with regard to	Page 133
2 3 4	A. Yes. You had questions with regard to certain systems, the system owners, business analysts.	Page 131	2 3 4	That's Q. Who would be, with regard to AMOS, let's go back to AMOS then.	Page 133
2 3 4 5	A. Yes. You had questions with regard to certain systems, the system owners, business analysts.  I, actually, have written	Page 131	2 3 4 5	That's Q. Who would be, with regard to AMOS, let's go back to AMOS then. Who would be the business	Page 133
2 3 4 5 6	A. Yes. You had questions with regard to certain systems, the system owners, business analysts.  I, actually, have written down the system owner for AMOS is	Page 131	2 3 4 5 6	That's Q. Who would be, with regard to AMOS, let's go back to AMOS then. Who would be the business analyst?	Page 133
2 3 4 5 6 7	A. Yes. You had questions with regard to certain systems, the system owners, business analysts.  I, actually, have written down the system owner for AMOS is Brian Bryzniski.	Page 131	2 3 4 5	That's Q. Who would be, with regard to AMOS, let's go back to AMOS then. Who would be the business analyst? A. Nate Blevins.	Page 133
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	Page 134			Page 136
1	A. That's Mohammad Kazemi.	1	That's A-N-N-A S-J-O-O.	
2	Q. Can you spell these names,	2	Q. The identities of these	
3	please, for the court reporter?	3	people for the COOL system, would those	
4	A. M-O-H-A-M-M-A-D, last name	4	be contained in a writing or some sort of	
5	Kazemi, K-A-Z-E-M-I.	5	documentation for the system someplace?	
6	Q. Who else did you have?	6	A. Yes.	
7	<ul> <li>A. The business analyst, Maria</li> </ul>	7	Q. And where would they be	
8	Bjorkqvist.	8	located?	
9	Q. For COOL. Correct?	9	<ul> <li>A. It would be those names</li> </ul>	
10	A. COOL.	10	would be located on materials such as	
11	Q. Can you spell her name,	11	change requests.	
12	please?	12	So if we were to attempt	
13	A. Maria, M-A-R-I-A,	13	to if business asked to change the	
14	B-J-O-R-K-Q-V-I-S-T.	14	system, those people in those roles would	
15	You also asked about SPOLA.	15	sign off. So they would be listed on	
16	The system owner for SPOLA is Susan	16	that document.	
17	Gutsmuth. And do you want the spelling	17	Q. Is the only way you could	
18	of the full name or the last name?	18	identify those people would be by going	
19	Q. We can spell Susan.	19	through change requests?	
20	A. G-U-T-S-M-U-T-H.	20	A. No.	
21	Q. Who else?	21	Q. Is there a list somewhere of	
22	A. The business analyst is	22	•	
23	Maria Bjorkqvist.	23	regard to the COOL database?	
24	Q. Who else?	24	A. Certain individuals would	
		- '		
	Page 135			Page 137
1	Page 135 A. And you had asked about	1	probably be listed in a service level	Page 137
1 2	A. And you had asked about	1 2	probably be listed in a service level	Page 137
2	A. And you had asked about DIPLOMAT. The system owner at the time	2	agreement.	Page 137
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	· · · · · · · · · · · · · · · · · · ·	Page 120			Page 140
1	misunderstood.	Page 138	1	scanner.	Page 140
2	MR. TORREGROSSA: I		2	Q. What kind of documents?	
3	apologize.		3	A. Contracts. I believe study	
4	MR. SMITH: Thanks.		4	master files, images of study master	
5	D-I-R-M. Thank you.		5	files.	10000
6	BY MR. SMITH:		6	Q. What kinds of contracts?	
7	Q. What is DIRM?		7	A. Contracts with clinical	
8	A. What is DIRM? DIRM is a		8	research organizations, contracts with	
9	document imaging database.		9	investigators.	
10	Q. Is D-I-R-M how you spell the	ï	10	Q. Where are the study master	
11	name of this database?		11	files maintained?	
12	A. Yes, D-I-R-M.		12	A. I believe the study master	
13	Q. And what does that stand		13	files are maintained in GEL.	
14	for?		14	Q. Would study protocols be	
15	A. Document imaging repository		15	maintained in DIRM?	
16	management system.		16	A. I'm sorry, could you	
17	Q. Is there a system map for		17	Q. Would study protocols be	
18	DIRM?		18	maintained in DIRM?	
19	A. A system map with such as		19	A. Study protocols maintained	
20	I drew for AMOS?		20	in DIRM.	Į.
21	Q. Yes.		21	I don't think the study	
22	A. I'm uncertain whether or not		22	protocols are maintained in DIRM.	
23	there is a system map for DIRM. I		23	Q. Do you know where the study	
24	would that would I would probably		24	protocols are maintained?	
		Page 139			Page 141
1	go to Rita White. I'm sorry, not Rita,	Page 139	1	MR. TORREGROSSA: Objection,	Page 141
2	but Paula George, and seek her assistance	Page 139	2	scope.	Page 141
2 3	but Paula George, and seek her assistance in identifying whether or not there's a	Page 139	2	scope.  You can answer if you have	Page 141
2 3 4	but Paula George, and seek her assistance in identifying whether or not there's a system map.	Page 139	2 3 4	scope.  You can answer if you have any individual knowledge.	Page 141
2 3 4 5	but Paula George, and seek her assistance in identifying whether or not there's a system map.  Q. Is there a data map for	Page 139	2 3 4 5	scope. You can answer if you have any individual knowledge. THE WITNESS: I believe that	Page 141
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1			· · · · · · · · · · · · · · · · · · ·	
	Page 142			Page 144
1	to form.	1	DIRM?	
2	THE WITNESS: I believe I	2	A. Yes.	
3	just answered that question.	3	Q. How would you do that?	
4	BY MR. SMITH:	4	<ul> <li>A. You would identify the</li> </ul>	
5	Q. I think that was in relation	5	object image that you desire to export,	
6	to an automatic feed.	6	and you would choose the export function.	
7	A. Can I ask how the second	7	Q. Is the metadata stored in	
8	question differs from the first?	8	relation to the .tifs in the system?	
9	Q. Is there any way to send	9	A. Yes.	
10	data from DIRM to another system?	10	Q. Is the metadata searchable?	
11	A. Could you	11	A. Yes.	
12	MR. TORREGROSSA: Wait. We	12	Q. Is that data used by anyone	
13	may have another question.	13	in AstraZeneca outside of the DIRM	
14	MR. SMITH: No, I'd like to	14	system?	
15	·	1	•	
	him to answer this question.	15	A. Could I hear the question	
16	MR. TORREGROSSA: Go ahead.	16	again, please?	
17	THE WITNESS: Can I answer	17	 /Tl	
18	the question again, please?	18	(The court reporter read the	
19	 /The second of the field	19	pertinent part of the record.)	
20	(The court reporter read the	20	THE WITNESS A Metale conden	
21	pertinent part of the record.)	21	THE WITNESS: I think you're	
22		22	asking me a question with regard	
23	BY MR. SMITH:	23	to business-related processes.	
24	Q. Actually, is there any way	24	If I heard you correctly,	
1	Page 143			Dago 14E
1	Page 143	1		Page 145
1 2	to send data from DIRM to another system?	1	you're asking me does the business	Page 145
2	to send data from DIRM to another system?  MR. TORREGROSSA: Objection,	2	you're asking me does the business use metadata somewhere else. I	Page 145
2 3	to send data from DIRM to another system?  MR. TORREGROSSA: Objection, form.	2 3	you're asking me does the business use metadata somewhere else. I can't answer that question.	Page 145
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	to send data from DIRM to another system?  MR. TORREGROSSA: Objection, form.  THE WITNESS: I get the sense of what you're asking me is a business-related question. I mean, I thought I answered the question earlier by simply stating that there is no interface, there's no again, I thought I answered that question earlier. I'm struggling to understand the difference between the questions. BY MR. SMITH: Q. Is it a standalone repository? A. Yes. Q. There's no access or connection with any other system?  MR. TORREGROSSA: Objection to the form, compound. THE WITNESS: No.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	you're asking me does the business use metadata somewhere else. I can't answer that question.  BY MR. SMITH: Q. Can you print a list of the users who have access to DIRM? A. Can I print a list of the users? We don't generally print lists of users. Q. Can you do so? A. I suppose I could create a list. Q. What are the document types in DIRM? A. Contracts, I'm sorry, what Q. Okay. You answered that one earlier. How would people be permissioned to input data into the free form text fields? A. I'm not certain there are	Page 145

		Page 146			Page 148
1	the data in any field in DIRM?		1	we met before back in January, I believe	
2	A. Yes.		2	you said that there was a field for	
3	Q. Which team or teams are able		3	country in CRF/DEN.	
4	to do that, have permission to do that?		4	Does that refresh your	
5	<ul> <li>A. Fowkes in is what you're</li> </ul>		5	recollection?	
6	asking me, who has access to the system?		6	MR. TORREGROSSA: Objection	
7	Q. Yes, another way of putting		7	to form.	
8	it.		8	THE WITNESS: I don't recall	
9	<ul> <li>A. The Fowkes that have access</li> </ul>		9	what I stated back in January.	
10	are in the study delivery.		10	I'm trying to explain to you what	
11	Q. And those people who have		11	I understand and recall about	
12	access, can they make changes to the		12	CRF/DEN and DIRM.	
13	data?		13	BY MR. SMITH:	
14	A. There are certain		14	Q. Can you print out a list of	
15	individuals who can change the indexing		15	the fields in CRF/DEN?	
16	attributes for those images.		16	A. Print out a list of fields	
17	Q. How are the images indexed?		17	in CRF/DEN.	
18	A. Author, title, investigator.		18	It's technically possible, I	
19	Q. Who's the vendor for DIRM?		19	believe, to possibly do a screen shot.	
20	A. AstraZeneca.		20	Would that	
21	Q. And when was it put into		21	Q. Could you export the	
22	use?		22	metadata to an Excel spreadsheet?	
23	A. In 1997.		23	MR. TORREGROSSA: Do you	
24	Q. Is it still in use?		23 24	need the question again?	
	Q. 15 it suit itt use:	-	24	need the question again:	
		Page 147			Page 149
1	A. Yes.		1	THE WITNESS: Yes. Could I	
2	<ul><li>Q. What system was used for</li></ul>		2	have the question again, please?	
3	this purpose prior to 1997?		3		
4	<ul> <li>A. I believe it was a system</li> </ul>		4	(The court reporter read the	
5	called SAS.		5	pertinent part of the record.)	
6	Q. One of the fields strike		6		
7	that.		7	THE WITNESS: We currently	
8	Is there a field in DIRM for		8	don't have a method for exporting	
9	country?		9	to Excel spreadsheets.	
10	A. I don't believe there's a		10	BY MR. SMITH:	
1 10	A. I don't believe there's a		1 + 0		
11	field in there for country, no.		11	Q. Can you export the data in	
1				Q. Can you export the data in any format?	
11	field in there for country, no.		11		
11 12	field in there for country, no. Q. How about in CRF/DEN, is		11 12	any format?  A. The metadata?	
11 12 13	field in there for country, no.  Q. How about in CRF/DEN, is there a field in CRF/DEN for country?  MR. CAMP BAILEY: What was		11 12 13	any format?  A. The metadata?	
11 12 13 14 15	field in there for country, no. Q. How about in CRF/DEN, is there a field in CRF/DEN for country?		11 12 13 14	any format? A. The metadata? Q. Yes. A. I believe it could be	
11 12 13 14 15 16	field in there for country, no. Q. How about in CRF/DEN, is there a field in CRF/DEN for country? MR. CAMP BAILEY: What was that last question?		11 12 13 14 15 16	any format?  A. The metadata?  Q. Yes.  A. I believe it could be exported into some form, although it I	
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11 12 13 14 15 16 17 18 19 20 21	field in there for country, no. Q. How about in CRF/DEN, is there a field in CRF/DEN for country? MR. CAMP BAILEY: What was that last question?  (The court reporter read the pertinent part of the record.)  THE WITNESS: I cannot visualize a country field in		11 12 13 14 15 16 17 18 19 20 21	any format?  A. The metadata? Q. Yes. A. I believe it could be exported into some form, although it I cannot think well, the answer still stands I guess yes, that it could be exported in some form.  I'm not going to say that all the metadata, but certain elements	

		Page 150			age 152
1	Q. Is DIRM built on Oracle?		1	storing the type of images that are in	
2	A. Yes.		2	DIRM for those that were acquired prior	
3	Q. Does it use FileNet?		3	to the start of DIRM?	
4	A. Yes.		4	<ul> <li>A. If you're referring to the</li> </ul>	
5	Q. Does it contain data from		5	paper, which was the form that they would	
6	any non-US sources?		6	have been in, there is a storage facility	
7	MR. TORREGROSSA: Can I get		7	for paper documents.	
8	that question again?		8	Q. Do you have an electronic	
9		•	9	storage system?	
10	(The court reporter read the		10	A. I'm not sure I understand	
	(The court reporter read the				İ
11	pertinent part of the record.)		11	the question.	
12	MD TODDEODOGA V		12	Q. For the types of files that	
13	MR. TORREGROSSA: You can		13	are imaged in DIRM that were acquired	
14	answer that limited question.		14	prior to DIRM, where and how are they	Í
15	THE WITNESS: I'm sorry?		15	stored?	
16	MR. TORREGROSSA: You can		16	A. There was no paper	
17	answer that limited question. You		17	documents were sent to archive. And they	
18	can answer whether it has data		18	are indexed so that they can be retrieved	
19	from non-US sources.		19	at a later time.	
20	THE WITNESS: No.		20	Q. Okay. So if I understand	
21	BY MR. SMITH:		21	you correctly, prior to DIRM, the	
22	Q. Can you provide a list of		22	documents were in paper form only?	
23	document types that are in DIRM?		23	A. Yes.	
24	MR. TORREGROSSA: Objection,		24	Q. And they're archived in	
- '	Mr. Torredrossa: Objection,		- '	Q. And they to dichived in	
		Page 151		Pi	age 153
1	form.	Page 151	1		age 153
1 2	form. You can answer.	Page 151	1 2	paper form, and no place are they	age 153
2	You can answer.	Page 151	2	paper form, and no place are they archived in electronic format?	age 153
2 3	You can answer. THE WITNESS: Yes.	Page 151	2	paper form, and no place are they archived in electronic format?  A. Can I just back up a little	age 153
2 3 4	You can answer. THE WITNESS: Yes. BY MR. SMITH:	Page 151	2 3 4	paper form, and no place are they archived in electronic format?  A. Can I just back up a little bit?	age 153
2 3 4 5	You can answer. THE WITNESS: Yes. BY MR. SMITH: Q. Was data prior to the	Page 151	2 3 4 5	paper form, and no place are they archived in electronic format?  A. Can I just back up a little bit?  What DIRM is an imaging	age 153
2 3 4 5 6	You can answer. THE WITNESS: Yes. BY MR. SMITH: Q. Was data prior to the initiation of DIRM migrated into DIRM?	Page 151	2 3 4 5 6	paper form, and no place are they archived in electronic format?  A. Can I just back up a little bit?  What DIRM is an imaging system. There's always a paper document	age 153
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		Page 154			Page 156
1	Q. Prior to 1997, those		1	But go ahead.	
2	documents only existed in paper form, not		2	THE WITNESS: I don't know.	
3	in electronic format. Right?		3	BY MR. SMITH:	
4	A. Yes.		4	Q. Is TRIM a database?	
5	Q. And they are stored today		5	A. I'm sorry?	
6	not in electronic format but as paper		6	Q. Let's break this down.	
7	documents only. Correct?		7	Is TRIM a database? We'll	
8	A. Yes.		8	be here all day if it takes it.	
9	Q. But there is an electronic		9	Is TRIM a database?	
	2				
10	system, an index, for those documents.		10	A. Yes.	
11	Correct?		11	Q. All right. There's some	
12	A. Yes.	,	12	sort of operating software that is used	
13	Q. Where is that electronic		13	to maintain this database?	
14	index and in what form and who has it or		14	A. Yes.	
15	what system has it?		15	Q. What type of software is it?	
16	MR. TORREGROSSA: Objection		16	A. This system is beyond my	
17	to the four questions.		17	technical expertise. I don't have all	
18	THE WITNESS: That's four		18	the technical knowledge with regard to	
19	questions.		19	TRIM.	
20	BY MR. SMITH:		20	MR. TORREGROSSA: This is a	
21	Q. We'll do one at a time.		21	record management system. It's	
22	<del>-</del>		22	<del></del>	
	A. Okay.			not particular to any one issue.	
23	Q. Where is the electronic form		23	It's sort of outside the scope of	
24	of the index maintained?		24	this deposition, because it's a	
-			<del> </del>		
Ī		Dage 155			Page 157
1	Λ It's in a system called	Page 155	1	record management issue. I'm just	Page 157
1 2	A. It's in a system called	Page 155	1	record management issue. I'm just	Page 157
2	TRIM.	Page 155	2	letting you know that, but go	Page 157
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	TRIM. Q. What is TRIM? That has never been identified before. What is TRIM? A. It's an index of paper documents in an archive. Q. Who maintains that TRIM system? A. I believe it's records management. Q. Who's the business owner? MR. TORREGROSSA: Objection to form. THE WITNESS: I don't know. BY MR. SMITH: Q. Who's the MR. TORREGROSSA: I'm sorry, go ahead. BY MR. SMITH: Q. Who is the database administrator?	Page 155	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	letting you know that, but go ahead.  BY MR. SMITH: Q. Your job, one of your functions is to manage records electronically, is it not? A. No. Q. No, that's not your job at all? A. No. Q. You don't do any document management electronically? A. No. Q. You mean well, CRF/DEN, isn't that an electronic document management system? A. It's an imaging system. Q. Isn't it a management system? A. It's they're images in the system.	Page 157
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ا ₄ ا		Page 158		Page 160
1	A. To image physical documents.		1	imaging systems. TRIM is
2	Q. Why would anybody want to		2	completely different. That's my
3	image physical documents?		3	only point.
4	A. I think you're asking me a		4	And it is outside the scope
5	question that is a related to a		5	of this. If you want to issue a
6	business process.		6	record management 30(b)6 under our
7	Q. Business owners come to your		7	agreement, you're welcome to do
8	department, and they work with you on		8	that and we're welcome to object
9	requirements for their business in the IS		9	to it. My only point to you is,
10	realm. Correct?		10	sir, is you can ask this question
11	A. That's correct.		11	as much as you want about TRIM and
12	Q. Your job is to provide IS		12	what he knows about it, but it's
13	support to the certain business		13	not the purpose of this 30(b)6.
14	departments at AstraZeneca. Correct?		14	It's outside the scope. That's
15	A. Yes.		15	all I'm telling you.
16	Q. Business departments		16	I'm sorry, I apologize. If
17	relating to drug safety. Correct?		17	you would like to follow up on
18	A. Yes.		18	TRIM, I will follow up for you and
19	Q. Business departments		19	we will consider your request.
20	relating to clinical studies. Correct?		20	• •
21	A. Yes.		21	That's my only point, Mr. Smith. BY MR. SMITH:
22				
23	Q. What other departments? Any		22	Q. If you have documents in
24	other departments?  A. The ones that I mentioned		23	an if you have images of documents in
24	A. The ones that I mentioned		24	a system, you're going to have tools to
		Page 159		
		rage 139		Page 161
1	earlier.	Page 159	1	Page 161 manage those documents. Correct?
1 2		rage 159	1 2	manage those documents. Correct?
2	Q. If you have a document	Page 139	2	manage those documents. Correct?  A. I'm not sure if you're
2 3	Q. If you have a document imaging system, would you ever, as an IS	rage 139	2 3	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective.
2 3 4	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system	rage 159	2 3 4	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective. Q. Sir, what does document
2 3 4 5	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?	rage 159	2 3 4 5	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective. Q. Sir, what does document management mean to you as an IS person?
2 3 4 5 6	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No.	rage 139	2 3 4 5 6	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective. Q. Sir, what does document management mean to you as an IS person? A. Management of documents.
2 3 4 5 6 7	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No.  Q. Have you ever heard of such	rage 139	2 3 4 5 6 7	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective. Q. Sir, what does document management mean to you as an IS person? A. Management of documents. Q. What do you mean,
2 3 4 5 6 7 8	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system?	rage 139	2 3 4 5 6 7 8	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective. Q. Sir, what does document management mean to you as an IS person? A. Management of documents. Q. What do you mean, management?
2 3 4 5 6 7 8 9	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system? A. No.	rage 139	2 3 4 5 6 7 8 9	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective. Q. Sir, what does document management mean to you as an IS person? A. Management of documents. Q. What do you mean, management? A. That could mean
2 3 4 5 6 7 8 9	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system? A. No. Q. I think we're playing word	rage 139	2 3 4 5 6 7 8 9	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective. Q. Sir, what does document management mean to you as an IS person? A. Management of documents. Q. What do you mean, management? A. That could mean Q. Not could mean. I'd like
2 3 4 5 6 7 8 9 10	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system? A. No. Q. I think we're playing word games here, to be honest with you.	rage 139	2 3 4 5 6 7 8 9 10	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective. Q. Sir, what does document management mean to you as an IS person? A. Management of documents. Q. What do you mean, management? A. That could mean Q. Not could mean. I'd like you to tell me what it does mean to you.
2 3 4 5 6 7 8 9 10 11 12	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system?  A. No. Q. I think we're playing word games here, to be honest with you.  MR. TORREGROSSA: Mr. Smith,	rage 139	2 3 4 5 6 7 8 9 10 11 12	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective. Q. Sir, what does document management mean to you as an IS person? A. Management of documents. Q. What do you mean, management? A. That could mean Q. Not could mean. I'd like you to tell me what it does mean to you. A. Managing documents to me
2 3 4 5 6 7 8 9 10 11 12 13	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system? A. No. Q. I think we're playing word games here, to be honest with you.  MR. TORREGROSSA: Mr. Smith, that's just inappropriate. All	rage 139	2 3 4 5 6 7 8 9 10 11 12 13	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective. Q. Sir, what does document management mean to you as an IS person? A. Management of documents. Q. What do you mean, management? A. That could mean Q. Not could mean. I'd like you to tell me what it does mean to you. A. Managing documents to me means the ability to author a document
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system? A. No. Q. I think we're playing word games here, to be honest with you.  MR. TORREGROSSA: Mr. Smith, that's just inappropriate. All I'm saying to you is you guys	rage 139	2 3 4 5 6 7 8 9 10 11 12 13 14	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective. Q. Sir, what does document management mean to you as an IS person? A. Management of documents. Q. What do you mean, management? A. That could mean Q. Not could mean. I'd like you to tell me what it does mean to you. A. Managing documents to me means the ability to author a document and then manage it through its life
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system? A. No. Q. I think we're playing word games here, to be honest with you.  MR. TORREGROSSA: Mr. Smith, that's just inappropriate. All I'm saying to you is you guys issued a notice that was about	rage 133	2 3 4 5 6 7 8 9 10 11 12 13 14 15	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective. Q. Sir, what does document management mean to you as an IS person? A. Management of documents. Q. What do you mean, management? A. That could mean Q. Not could mean. I'd like you to tell me what it does mean to you. A. Managing documents to me means the ability to author a document and then manage it through its life cycle, i.e., I create it, I send it out
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system? A. No. Q. I think we're playing word games here, to be honest with you.  MR. TORREGROSSA: Mr. Smith, that's just inappropriate. All I'm saying to you is you guys issued a notice that was about record management, okay, of	rage 133	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective.  Q. Sir, what does document management mean to you as an IS person?  A. Management of documents.  Q. What do you mean, management?  A. That could mean  Q. Not could mean. I'd like you to tell me what it does mean to you.  A. Managing documents to me means the ability to author a document and then manage it through its life cycle, i.e., I create it, I send it out for review, I approve it, I retire it.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system?  A. No. Q. I think we're playing word games here, to be honest with you.  MR. TORREGROSSA: Mr. Smith, that's just inappropriate. All I'm saying to you is you guys issued a notice that was about record management, okay, of physical paper documents. That's	rage 139	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective. Q. Sir, what does document management mean to you as an IS person? A. Management of documents. Q. What do you mean, management? A. That could mean Q. Not could mean. I'd like you to tell me what it does mean to you. A. Managing documents to me means the ability to author a document and then manage it through its life cycle, i.e., I create it, I send it out for review, I approve it, I retire it. That's what a document management system
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system? A. No. Q. I think we're playing word games here, to be honest with you.  MR. TORREGROSSA: Mr. Smith, that's just inappropriate. All I'm saying to you is you guys issued a notice that was about record management, okay, of physical paper documents. That's not here what we're talking about	rage 139	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective. Q. Sir, what does document management mean to you as an IS person? A. Management of documents. Q. What do you mean, management? A. That could mean Q. Not could mean. I'd like you to tell me what it does mean to you. A. Managing documents to me means the ability to author a document and then manage it through its life cycle, i.e., I create it, I send it out for review, I approve it, I retire it. That's what a document management system is.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system? A. No. Q. I think we're playing word games here, to be honest with you.  MR. TORREGROSSA: Mr. Smith, that's just inappropriate. All I'm saying to you is you guys issued a notice that was about record management, okay, of physical paper documents. That's not here what we're talking about today.	rage 139	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective.  Q. Sir, what does document management mean to you as an IS person?  A. Management of documents.  Q. What do you mean, management?  A. That could mean  Q. Not could mean. I'd like you to tell me what it does mean to you.  A. Managing documents to me means the ability to author a document and then manage it through its life cycle, i.e., I create it, I send it out for review, I approve it, I retire it. That's what a document management system is.  Q. You don't think you were
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system?  A. No. Q. I think we're playing word games here, to be honest with you.  MR. TORREGROSSA: Mr. Smith, that's just inappropriate. All I'm saying to you is you guys issued a notice that was about record management, okay, of physical paper documents. That's not here what we're talking about today.  So my only point to you is that he's prepared to talk about	rage 133	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective.  Q. Sir, what does document management mean to you as an IS person?  A. Management of documents.  Q. What do you mean, management?  A. That could mean  Q. Not could mean. I'd like you to tell me what it does mean to you.  A. Managing documents to me means the ability to author a document and then manage it through its life cycle, i.e., I create it, I send it out for review, I approve it, I retire it. That's what a document management system is.  Q. You don't think you were managing documents that were created by somebody else?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system?  A. No. Q. I think we're playing word games here, to be honest with you.  MR. TORREGROSSA: Mr. Smith, that's just inappropriate. All I'm saying to you is you guys issued a notice that was about record management, okay, of physical paper documents. That's not here what we're talking about today.  So my only point to you is that he's prepared to talk about the databases that manage some of	rage 139	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective.  Q. Sir, what does document management mean to you as an IS person?  A. Management of documents.  Q. What do you mean, management?  A. That could mean  Q. Not could mean. I'd like you to tell me what it does mean to you.  A. Managing documents to me means the ability to author a document and then manage it through its life cycle, i.e., I create it, I send it out for review, I approve it, I retire it. That's what a document management system is.  Q. You don't think you were managing documents that were created by somebody else?  MR. TORREGROSSA: Objection
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. If you have a document imaging system, would you ever, as an IS person, have a document imaging system that didn't have some sort of index?  A. No. Q. Have you ever heard of such a system?  A. No. Q. I think we're playing word games here, to be honest with you.  MR. TORREGROSSA: Mr. Smith, that's just inappropriate. All I'm saying to you is you guys issued a notice that was about record management, okay, of physical paper documents. That's not here what we're talking about today.  So my only point to you is that he's prepared to talk about	rage 139	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	manage those documents. Correct?  A. I'm not sure if you're asking me from a technical perspective.  Q. Sir, what does document management mean to you as an IS person?  A. Management of documents.  Q. What do you mean, management?  A. That could mean  Q. Not could mean. I'd like you to tell me what it does mean to you.  A. Managing documents to me means the ability to author a document and then manage it through its life cycle, i.e., I create it, I send it out for review, I approve it, I retire it. That's what a document management system is.  Q. You don't think you were managing documents that were created by somebody else?

١.	Page 162		average it is some fraking. Convert?	Page 164
1	understand the question.	1	organize it in some fashion. Correct?	
2	BY MR. SMITH:	2	A. When you I'm sorry, the	
3	Q. In your view, document	3	question was, when you manage it	27.7 22.4 46.
4	management means you're only dealing with	4	Q. When you manage data, you	
5	documents that are authored by the people	5	organize it in some fashion. Correct?	
6	you're working for. Correct?	6	A. You can organize it, yes.	*
7	MR. TORREGROSSA: Objection	7	Q. If it's not organized, what	
8	to form.	8	use is it to you?	
9	THE WITNESS: Can I hear the	9	A. It becomes simply a	
10	question again, please?	10	repository, an archive.	
11	/The enough were when we ad the e	11	Q. Is TRIM an archive?	
12	(The court reporter read the	12	MR. TORREGROSSA: Again,	
13	pertinent part of the record.)	13	objection, scope.	
14	THE MITTHESS AND	14	You can answer on your	er er
15	THE WITNESS: Not	15	individual knowledge.	
16	necessarily. They could be	16	THE WITNESS: It's a system	
17	documents that are created by	17	for managing physical paper	
18	someone else.	18	documents.	
19	BY MR. SMITH:	19	BY MR. SMITH:	
20	Q. Okay. Well, I was confused	20	Q. Is it searchable?	
21	by your definition of document management	21	MR. TORREGROSSA: Same	
22	when you said that it only dealt with	22	objection.	
23	documents that were authored by you and	23	THE WITNESS: Yes.	
24	tracked through their life cycle.	24	BY MR. SMITH:	
-				
	Page 163			Page 165
1	Page 163  A I thought you asked my	1	O Can you print out the data	Page 165
1 2	A. I thought you asked my	1 2	Q. Can you print out the data	Page 165
2	A. I thought you asked my personal description.	2	in the system?	Page 165
2 3	A. I thought you asked my personal description. Q. Well, is your personal	2	in the system?  MR. TORREGROSSA: Same	Page 165
2 3 4	A. I thought you asked my personal description. Q. Well, is your personal description different from people in the	2 3 4	in the system?  MR. TORREGROSSA: Same objection.	Page 165
2 3 4 5	A. I thought you asked my personal description. Q. Well, is your personal description different from people in the industry, the definition the people in	2 3 4 5	in the system?  MR. TORREGROSSA: Same objection.  THE WITNESS: I believe you	Page 165
2 3 4 5 6	A. I thought you asked my personal description. Q. Well, is your personal description different from people in the industry, the definition the people in the IS industry would use for document	2 3 4 5 6	in the system?  MR. TORREGROSSA: Same objection.  THE WITNESS: I believe you can.	Page 165
2 3 4 5 6 7	A. I thought you asked my personal description. Q. Well, is your personal description different from people in the industry, the definition the people in the IS industry would use for document management?	2 3 4 5 6 7	in the system?  MR. TORREGROSSA: Same objection.  THE WITNESS: I believe you can.  BY MR. SMITH:	Page 165
2 3 4 5 6 7 8	A. I thought you asked my personal description. Q. Well, is your personal description different from people in the industry, the definition the people in the IS industry would use for document management? A. I don't know that answer.	2 3 4 5 6 7 8	in the system?  MR. TORREGROSSA: Same objection.  THE WITNESS: I believe you can.  BY MR. SMITH:  Q. Can you provide a data map	Page 165
2 3 4 5 6 7 8 9	A. I thought you asked my personal description. Q. Well, is your personal description different from people in the industry, the definition the people in the IS industry would use for document management? A. I don't know that answer. Q. Can we agree that	2 3 4 5 6 7	in the system?  MR. TORREGROSSA: Same objection.  THE WITNESS: I believe you can.  BY MR. SMITH:	Page 165
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Ι.		Page 166			Page 168
1	BY MR. SMITH:		1	maintenance for the TRIM system?	
2	<ul><li>Q. Do you know who the users of</li></ul>		2	A. I don't know.	
3	TRIM are?		3	Q. I may have asked you this	
4	MR. TORREGROSSA: Same		4	before, but is there a database manager	
5	objection.		5	for TRIM?	
6	-		_		
	You can answer.		6	A. I don't know.	
7	THE WITNESS: I don't know		7	Q. Do you know if there's a	
8	all the users.		8	business analyst for TRIM?	
9	BY MR. SMITH:		9	A. No.	
10	Q. Do you know any users?		10	Q. Do you know what other	
11	A. Yes.		11	systems TRIM interfaces with?	
12	Q. Who?		12	A. No.	
,	2				
13	A. Study I'm sorry, clinical		13	Q. Do you know who the vendor	
14	data management.		14	is for TRIM?	
15	Q. Do you know how they access		15	A. AstraZeneca.	
16	it?		16	Q. Do you know when the system	
17	MR. TORREGROSSA: Same		17	was implemented?	
18	objection.		18	A. No.	
19	You can answer.		19	Q. What type of system is it,	
20					
	THE WITNESS: They put a		20	can you describe it for me?	
21	request in for an account.		21	A. It's a client server system,	
22	BY MR. SMITH:		22	client server.	
23	Q. Do you know what the fields		23	Q. Is it Oracle based?	
24	are in the indexing system?		24	A. I don't know.	
<b></b>		<u>.</u>	<u> </u>		
		Page 167			Page 169
1	MR. TORREGROSSA: Can I just		1	<ul><li>Q. Could you print out a list</li></ul>	
1 _	<del>-</del>				
12	det a running objection nere?		l 2	of the images in the TRIM system?	
2	get a running objection here?  MR SMITH: To any question		2	of the images in the TRIM system?  MR_TORREGROSSA: Objection	
3	MR. SMITH: To any question		3	MR. TORREGROSSA: Objection	
3 4	MR. SMITH: To any question about TRIM?		3 4	MR. TORREGROSSA: Objection to form, images.	
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