

EXHIBIT

47

1 IN THE SUPERIOR COURT
2 OF THE STATE OF DELAWARE
3 IN AND FOR NEW CASTLE COUNTY

4 IN RE:
5 SEROQUEL LITIGATION : MDL NO. 1769
6 :
7 THIS DOCUMENT RELATES:
8 TO ALL ACTIONS :

9 -----
10 IN RE: : SUPERIOR COURT
11 RISPERDAL/SEROQUEL/ : OF NEW JERSEY
12 ZYPREXA LITIGATION : LAW DIVISION
13 : MIDDLESEX COUNTY
14 : CASE NO. 274

15 -----
16 AIMEE DANIELS, : IN THE CIRCUIT
17 : COURT OF THE
18 V. : COUNTY OF ST. LOUIS
19 : STATE OF
20 ASTRAZENECA : MISSOURI
21 PHARMACEUTICALS, L.P. : 05CC-004759
22 ET AL. : DIVISION 6

23 -----
24 SANTOS MALDANADO, : IN THE CIRCUIT
25 minor, by and through: COURT OF THE
26 his natural mother : COUNTY OF ST. LOUIS
27 and next friend, : STATE OF
28 LOUISE WILSON : MISSOURI
29 V. : 06CC-003930
30 JANSSEN PHARMACEUTICA: DIVISION 6
31 L.P., ET AL. :

32 - - -
33 May 18, 2007
34 - - -

35 C O N F I D E N T I A L
36 - - -

37 Continued 30(b)(6) deposition of
38 ASTRAZENECA PHARMACEUTICALS, L.P., by and
39 through DARRYL DRAPER.

40 - - -
41 Golkow Technologies, Inc.
42 Suite 760
43 1880 John F. Kennedy Boulevard
44 Philadelphia, Pennsylvania 19103

1 LENA BARNETT, minor, : IN THE CIRCUIT
 2 by and through her : COURT OF THE
 3 natural mother and : COUNTY OF ST. LOUIS
 4 next friend, : STATE OF
 5 MARY BARNETT : MISSOURI
 6 V. : 06CC-000333
 7 JANSSEN PHARMACEUTICA: DIVISION 6
 8 L.P., ET AL. :

 9 LOIS BAER, as : IN THE CIRCUIT
 10 Representative of the: COURT OF THE
 11 Estate of MATTHEW : COUNTY OF ST. LOUIS
 12 BAER, Deceased : STATE OF
 13 V. : MISSOURI
 14 JANSSEN PHARMACEUTICA: 06CC-002401
 15 L.P., ET AL. : DIVISION 6

 16 TERRY STRINGER : IN THE CIRCUIT
 17 : COURT OF THE
 18 V. : COUNTY OF ST. LOUIS
 19 : STATE OF
 20 JANSSEN PHARMACEUTICA: MISSOURI
 21 L.P., ET AL. : 06CC-002173
 22 : DIVISION 6

 23 STEPHEN ROSAS : IN THE CIRCUIT
 24 : COURT OF THE
 V. : COUNTY OF ST. LOUIS
 : STATE OF
 ASTRAZENECA : MISSOURI
 PHARMACEUTICALS, : 05CC-004755
 L.P., ET AL. : DIVISION 6

 PAMELA MOORE, : IN THE CIRCUIT
 : COURT OF THE
 V. : COUNTY OF ST. LOUIS
 : STATE OF
 JANSSEN PHARMACEUTICA: MISSOURI
 L.P., ET AL. : 05CC-006375
 : DIVISION 6

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1 KATHRYN SCHULTZ, : SUPERIOR COURT OF
 2 ET AL. : THE STATE OF
 3 : CALIFORNIA IN AND
 4 V. : FOR THE COUNTY OF
 5 : SAN FRANCISCO
 6 ASTRAZENECA : CGC-06-453676
 7 PHARMACEUTICALS, :
 8 L.P., ET AL. :
 9 -----
 10 Continued 30(b)(6)
 11 deposition of ASTRAZENECA
 12 PHARMACEUTICALS, L.P., by and through
 13 DARRYL DRAPER, taken pursuant to notice,
 14 was held at Four Seasons Hotel, One Logan
 15 Square, Philadelphia, Pennsylvania,
 16 commencing at 9:14 a.m., on the above
 17 date, before Ann Marie Mitchell, a
 18 Federally Approved RDR, CRR, CSR and
 19 Notary Public.
 20
 21
 22
 23
 24

1
 2 ALSO PRESENT:
 3 BAILEY PERRIN BAILEY
 4 RHONDA RADLIFF
 5 PROJECT MANAGEMENT
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1 - - -

2 I N D E X

3 - - -

4 Testimony of: DARRYL DRAPER

5 By Mr. Smith 272

6

7

8 - - -

9 E X H I B I T S

10 - - -

11

NO.	DESCRIPTION	PAGE
13	Draper-4 Seroquel International Approval Form, Bates stamped AZ/SER 0834196 through AZ/SER 0834198	360
17	Draper-5 Sources of Reporters, Bates stamped AZ/SER 2288019	367
20	Draper-6 Welcome to AstraZeneca SOP No. 2 version 2 Drug Safety Adverse Event Report Training, Bates stamped AZ/SER 2288012 through AZ/SER 2288018	370

24

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2 D E P O S I T I O N S U P P O R T I N D E X

3 - - -

4

5 Direction to Witness Not to Answer

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10 Request for Production of Documents

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14 Stipulations

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17

18 Question Marked

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19

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21

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23

24

1 Draper-7 IND Annual Report 379

2 Call for

3 Information

4 Contributors List

5 for Seroquel

6 (quetiapine

7 fumarate) IND

8 Number 32,132,

9 Bates stamped

10 AZ/SER 0535899

11

12 Draper-8 US Clinical 386

13 Information Science

14 Organizational

15 Chart, Wilmington

16 Clinical

17 Information Science

18 Leadership Team

19

20 Draper-9 Medical 390

21 Communications &

22 Document Management

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24 Draper-10 Data Management 392

25 Technology

26 Draper-11 Information 393

27 Strategy

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29 Draper-12 Packet of 426

30 Cross-Notices

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1 - - -

2 E X A M I N A T I O N

3 - - -

4 BY MR. SMITH:

5 Q. Mr. Draper, I'd like to ask

6 you some questions about the CLINTRACE

7 system.

8 MR. TORREGROSSA: Can I just

9 make one clarification on the

10 record?

11 MR. SMITH: Okay.

12 MR. TORREGROSSA: Yesterday

13 I neglected to tell you that you

14 can ask away about Webster and

15 eStar, technical questions to Mr.

16 Draper. Webster I believe was one

17 you inquired into Mr. Dowling, and

18 he didn't have answers. Mr.

19 Draper will have the technical

20 answers that you're looking for.

21 And then additionally, Mr.

22 Draper I believe would like to

23 make one clarification about his

24 testimony yesterday.

1 THE WITNESS: There was some
2 questions with regard to AZ IMPACT
3 and previous systems, et cetera.

4 And I think I became a
5 little confused with some of the
6 acronyms that we -- that we
7 typically use in IS, in the IS
8 area, the information systems
9 area.

10 And thinking back through
11 things in my mind, there was a
12 system prior to AZ IMPACT. And
13 that system was called CTM. That
14 name is Clinical Trial Manager.
15 And that's the correction. I
16 think I used some other letters.
17 And those were another predecessor
18 system, long before CTM. So I
19 just wanted to clarify that.

20 BY MR. SMITH:

21 Q. There was another
22 predecessor prior to CTM.

23 A. Yes.

24 Q. What was that?

1 Q. AZ IMPACT.

2 Is a data map available for
3 CTM?

4 A. I don't believe a data map
5 is available, no.

6 Q. Where could we get a
7 description of the fields and tables?

8 A. That would be in some of the
9 system documentation.

10 Q. Is that available?

11 A. That information would have
12 been sent to paper archive.

13 Q. So it is available?

14 A. Yes, it's available.

15 Q. And a system map or diagram,
16 is that available?

17 A. Again, if one was produced,
18 that would be in the system
19 documentation.

20 Q. Who was the application
21 service manager for CTM, please?

22 A. I'm not sure that we used
23 the terminology "application service
24 manager," but the individual who I would

1 A. The direct predecessor of
2 CTM was DIPLOMAT. That was the system
3 that was used for clinical trial
4 management.

5 Q. Let's talk about CTM for a
6 minute then.

7 A. Okay.

8 Q. What were the dates of its
9 use?

10 A. 1998 to 2000.

11 Q. The predecessor was
12 DIPLOMAT?

13 A. Correct.

14 Q. And the successor was --
15 is --

16 A. Successor to --

17 Q. CTM?

18 A. -- DIPLOMAT was CTM. That's
19 correct.

20 Q. The successor to CTM is
21 what?

22 A. The successor CTM?

23 Q. To CTM.

24 A. AZ IMPACT.

1 have considered a peer for that system
2 would be Frank Savin.

3 Q. Can you spell that last
4 name, please?

5 A. S-A-V-I-N.

6 Q. What would be the term that
7 was used at that time in place of
8 application service manager or something
9 analogous to that?

10 A. Senior systems design
11 developer or systems design developer.

12 Q. Would there have been
13 somebody called a database administrator?

14 A. Yes.

15 Q. And who would that have
16 been?

17 A. That would have been a
18 AstraZeneca person.

19 Q. Do you know which --

20 A. I mean, you're talking 2000.
21 I mean, to the best of my recollection, a
22 gentleman by the name of Bob Hoskins.

23 Q. Would there have been a
24 business partner for the CTM system?

1 A. Yes.
 2 Q. Who was that?
 3 A. I believe that would have
 4 also been Frank Savin.
 5 Q. Who was the business owner
 6 for CTM?
 7 A. Dave Cartwright.
 8 Q. What types of information
 9 were contained in CTM?
 10 A. Information used to manage
 11 the trial.
 12 Q. What types of information?
 13 A. What types of information?
 14 Number of visits, center, study,
 15 investigator.
 16 Q. Those would be fields,
 17 right, also?
 18 A. Yes. Same information.
 19 It's very similar information as you
 20 would find, as I answered for AZ IMPACT.
 21 Q. What format or type of
 22 information, in other words, data,
 23 documents, collection of information?
 24 A. Data, yes. Documents, I'm

1 called -- I'm going purely on memory
 2 here, my involvement, it was either
 3 IMPACT or Phase Forward.
 4 Q. What was your involvement
 5 with CTM?
 6 A. I didn't have a direct
 7 involvement with CTM, but I worked
 8 with -- a colleague, Frank Savin, and I
 9 worked in the same group. So I often
 10 attended meetings with Frank.
 11 Q. Is that S-A-V, as in Victor,
 12 or S-A-B, as in boy?
 13 A. V as in Victor.
 14 Q. You worked with Frank on
 15 CTM?
 16 A. No.
 17 Q. You attended meetings with
 18 Frank?
 19 A. Right. Group department
 20 meetings.
 21 Q. What was your involvement
 22 with DIPLOMAT?
 23 A. I didn't have any direct
 24 involvement with DIPLOMAT.

1 uncertain of.
 2 And what was the last one?
 3 Q. Collections of information.
 4 A. Yes.
 5 Q. When you say that they are
 6 collections of information, would that
 7 be -- would that also be data or would it
 8 be in some other form?
 9 A. I would expect it to be
 10 purely in data.
 11 Q. Again, could fields and
 12 tables for CTM be copied or printed at
 13 that time?
 14 A. For that -- that data was
 15 migrated to AZ IMPACT, so the information
 16 would be in AZ IMPACT.
 17 Q. So that information is
 18 available today then?
 19 A. Yes.
 20 Q. All of it?
 21 A. Yes.
 22 Q. Who is the vendor for CTM?
 23 A. To the best of my
 24 recollection, I believe it was a company

1 Q. Do you have any direct
 2 involvement with AZ IMPACT?
 3 A. No.
 4 Q. Do you supervise personnel
 5 who provide services to or did provide
 6 services to each of these three systems?
 7 A. Each of the three systems
 8 being?
 9 Q. I'll break it down.
 10 Do you have any supervisory
 11 responsibilities with regard to AZ
 12 IMPACT?
 13 A. No.
 14 Q. Are the people who provide
 15 IS services for AZ IMPACT peers as
 16 opposed to being persons under you?
 17 A. Could I hear the question
 18 again, please?
 19 Q. Are the persons who are
 20 involved in AZ IMPACT peers as opposed
 21 to -- providing services for AZ IMPACT
 22 peers as opposed to persons under you?
 23 A. Peers.
 24 Q. What were the data sources

1 for CTM?
2 A. Study team -- study team,
3 study center.
4 Q. Is a study team a part of
5 AstraZeneca? Are they employees of
6 AstraZeneca?
7 A. Yes.
8 Q. And the study center, would
9 that be outside research organizations?
10 A. Yes. The center, like a
11 medical institution or hospital or...
12 Q. Right. And how does
13 information from the study team get into
14 CTM?
15 A. It's entered by somebody on
16 the study team.
17 Q. And how is information
18 inputted to CTM from a study center?
19 A. A study monitor would visit
20 the center and collect that information,
21 enter it into CTM.
22 Q. A study monitor is a person
23 employed by AstraZeneca?
24 A. Could be, yes.

1 Q. Who else could that person
2 be employed by?
3 A. Again, you know, these are
4 nontechnical questions that are better
5 answered by someone from the business. I
6 don't -- I don't know who the functional
7 areas employ to enter data. I'm assuming
8 they're all AstraZeneca employees.
9 MR. TORREGROSSA: Objection,
10 scope.
11 BY MR. SMITH:
12 Q. Were there training
13 materials for CTM?
14 A. Yes.
15 Q. Are they available?
16 A. I would expect that they are
17 available in the paper archives.
18 Q. What type of database was
19 CTM?
20 A. It's an Oracle database.
21 Q. Where was the server
22 located?
23 A. In Wilmington.
24 Q. Was the server, the DIPLOMAT

1 server, located in Wilmington also?
2 A. Yes.
3 Q. And the server for AZ
4 IMPACT, was that located in Wilmington
5 also or is that located in Wilmington?
6 A. No.
7 Q. Where is that located?
8 A. I believe AZ IMPACT is
9 located in Lund, Sweden.
10 Q. Was there a user list for
11 CTM?
12 A. I would expect there would
13 be some information regarding users.
14 Whether or not there's any list, I can't
15 say whether or not there's a list such as
16 a piece of paper with all users listed.
17 Q. Would you be able -- if the
18 system were running, would you be able to
19 look within the system and find out which
20 people have access to the system?
21 A. I would expect that
22 information to be available if that -- if
23 the system were live. It was
24 decommissioned, and the data was migrated

1 to AZ IMPACT.
2 Q. Could you run queries in
3 CTM?
4 A. If what you mean by queries,
5 the business ability to search
6 information such as study, center, when
7 the last visit was, yes, very similar to
8 what you would perform, the types of
9 business functions that you would
10 perform. Again, very similar to AZ
11 IMPACT.
12 Q. Were you able to export data
13 from CTM to another system?
14 A. The data was migrated to AZ
15 IMPACT.
16 Q. Are you aware of any
17 corruption or loss of data from CTM?
18 A. No.
19 Q. What is eStar that your
20 counsel mentioned?
21 A. EStar is a system used to
22 review promotional materials and/or --
23 sorry. Yes, promotional materials.
24 Q. Can you author promotional

1 materials within eStar?
2 A. You can -- eStar stands for
3 submission -- I believe it's submission
4 tracking -- I believe it's submission
5 tracking of requests.
6 Q. Not reporting? You think
7 it's more likely requests?
8 A. No, it would not be
9 reporting.
10 Q. Does it allow users to
11 author promotional materials using the
12 eStar system?
13 A. It allows individuals to
14 assemble information. It tracks the
15 submission of that information and the
16 review of that information.
17 Q. Does it track submission to
18 the FDA?
19 A. No.
20 Q. Submission to whom?
21 A. Submission to the medical
22 affairs group. So a request for -- we
23 need some medical information, sorry,
24 some promotional information for a

1 therapy for a disease.
2 Q. A request for medical
3 information would be what's known as a
4 PIR?
5 A. No.
6 Q. Would a PIR be one type of
7 request for medical information?
8 A. A PIR is a form of request
9 for information.
10 Q. PIR stands for professional
11 information request; is that correct?
12 A. That's correct.
13 Q. Is there a system that
14 manages PIRs?
15 A. Yes.
16 Q. What is the name of that
17 system?
18 A. Webster.
19 Q. What were the dates for use
20 of eStar?
21 A. I'm sorry, I'm just -- I'm
22 trying to recall some information.
23 Could I hear the question
24 again, please?

1 Q. What were the dates for use
2 of eStar?
3 A. 2000.
4 Q. To present?
5 A. Yes.
6 Q. Is a data map for eStar
7 available?
8 A. No.
9 Q. Is a system map available?
10 A. No.
11 Q. Is there a system map? Does
12 one exist?
13 A. Is that just your previous
14 question rephrased? If it is, the answer
15 is still no.
16 Q. There is no system map for
17 eStar.
18 Is that your answer?
19 A. Yes.
20 Q. And is there a data map for
21 eStar? Does one exist?
22 A. If what you're referring to
23 is an entity relationship diagram, I
24 believe that we have an entity

1 relationship diagram for eStar.
2 Q. And we talked about, when I
3 asked you about entity relationship
4 diagrams for other systems that we talked
5 about yesterday, you said you didn't use
6 that term.
7 Is eStar the only system
8 that you support that uses that term,
9 "ERD"?
10 A. Again, I don't recall
11 everything that I said yesterday, but I
12 think I've answered the question with
13 regard to whether or not there's an
14 entity relationship diagram. And that
15 answer is yes.
16 Q. Do any of the other systems
17 you support have an ERD?
18 A. Yes.
19 Q. If there's an ERD, can it be
20 printed out?
21 A. That's a difficult question
22 to answer. And it's difficult in that
23 you're suggesting that an entity
24 relationship diagram is strictly some

1 electronic information that you could
2 otherwise print. An entity relationship
3 diagram can be a physical piece of paper
4 with entity relationships on it.

5 So I can answer the question
6 yes and no.

7 Q. Can you make a copy of an
8 ERD, if it exists, for any of the systems
9 you support?

10 A. Yes.

11 Q. All right. For any of the
12 systems you support, are there any that
13 do not have an ERD?

14 A. Can I just take a
15 five-minute break?

16 MR. SMITH: Sure,
17 absolutely. Any time.

18 - - -

19 (A recess occurred.)

20 - - -

21 MR. TORREGROSSA: I want to
22 give you a little different name
23 for eStar. I think we may have
24 confused you with our description

1 lawyer whether something you wanted to
2 say would be privileged or not during the
3 break?

4 A. No.

5 Q. What did you talk about?

6 MR. TORREGROSSA: No, don't
7 discuss that. Instruct him not to
8 answer.

9 BY MR. SMITH:

10 Q. Are you going to follow your
11 counsel's advice?

12 A. Yes.

13 Q. You weren't talking about
14 matters of privilege. You were talking
15 about something that had to do with
16 today's deposition. Right?

17 MR. TORREGROSSA: Don't
18 discuss what we were talking
19 about. Instruct him not to
20 answer. This is lawyer 101.

21 BY MR. SMITH:

22 Q. Are you going to follow your
23 counsel's advice?

24 A. Yes.

1 of what eStar stands for, so we
2 want to try that again.

3 THE WITNESS: Apologies.

4 BY MR. SMITH:

5 Q. Mr. Draper, during the
6 break, did you have an opportunity to
7 confer with your counsel?

8 MR. TORREGROSSA: That's a
9 yes or no.

10 THE WITNESS: Yes.

11 BY MR. SMITH:

12 Q. Did it involve a question of
13 privilege as to whether your answer to
14 any of my questions would involve
15 attorney-client privilege?

16 MR. TORREGROSSA: That's an
17 extremely vague question. I
18 object to the form. And I also
19 think it's a legal determination.

20 You can answer the question.

21 MR. SMITH: Let me rephrase
22 the question.

23 BY MR. SMITH:

24 Q. Did you have to ask your

1 Q. Well, now that you've had a
2 chance to confer with your counsel, what
3 would you like to change about your
4 testimony?

5 A. I described eStar
6 incorrectly with regard to the R in eStar
7 being request. It's actually review.

8 Q. We were both wrong.

9 A. We were both wrong.

10 Q. Anything else about your
11 testimony so far that you'd like to
12 change or add to?

13 A. No.

14 Q. I asked you about a system
15 map for eStar.

16 Is there any sort of diagram
17 that would show the sources, the
18 interfacing of the eStar system with
19 other systems?

20 A. Yes.

21 Q. What would you call such a
22 diagram?

23 A. I'm sorry, could I have the
24 question again?

1 - - -
 2 (The court reporter read the
 3 pertinent part of the record.)
 4 - - -

5 THE WITNESS: System map.

6 BY MR. SMITH:

7 Q. A system map, okay.
 8 So there is a system map for
 9 eStar then?

10 A. The information that you
 11 would use to accept --

12 Q. Let me ask you to give me a
 13 yes or no answer, and then you can
 14 explain it, if you'd need to, but I'd
 15 like a yes or no answer to my question.

16 Is there a system map for
 17 eStar? That's a yes or no question.

18 MR. TORREGROSSA: No. He's
 19 allowed to explain his testimony.

20 MR. SMITH: He doesn't have
 21 to explain it. You can answer
 22 with just a yes or no.

23 MR. TORREGROSSA: No. You
 24 can't force him to do that.

1 Q. All right. My question was,
 2 is there a system map, and your answer
 3 then is I don't know; is that correct?

4 MR. TORREGROSSA: Objection
 5 to form.

6 THE WITNESS: Yes.

7 BY MR. SMITH:

8 Q. Who could you ask to find
 9 out whether a system map exists for
 10 eStar?

11 A. Steve Aaronson.

12 Q. Is there a repository where
 13 system maps are stored for multiple
 14 systems that you support?

15 A. Yes.

16 Q. Where is that system?

17 A. I'm sorry, could I -- I'm
 18 not certain that I understood the
 19 previous question.

20 You asked is there a system?
 21 Or you asked was there a place where
 22 they're stored?

23 Q. Is there a repository?

24 A. So your question, your last

1 MR. SMITH: I absolutely
 2 will require a yes or no answer to
 3 my question. If he won't give it
 4 to me, we will take it up with the
 5 magistrate.

6 MR. TORREGROSSA: No. He
 7 can give a yes or no, but if he
 8 can't, he's allowed to explain
 9 why.

10 Go ahead.

11 BY MR. SMITH:

12 Q. Okay. Can you answer that
 13 question yes or no?

14 A. No.

15 Q. Why can't you answer that
 16 question yes or no?

17 A. Because there -- the
 18 information is available for the system.
 19 That's our documentation of the system.
 20 And there may be information that you
 21 could use to assemble a system map. I've
 22 not seen that system documentation. I
 23 can't say precisely whether or not it
 24 contains a system map.

1 question, could I have that --

2 Q. We established that there's
 3 a repository for system maps for multiple
 4 systems that you support. Right?

5 A. The system maps are part of
 6 the system documentation.

7 Q. Is there a repository for
 8 system documentation? That's a yes or no
 9 question.

10 A. Yes.

11 Q. Where is that repository
 12 located?

13 A. That repository could be in
 14 paper archive. It could also be on a
 15 file system. It could also be in a
 16 document management system.

17 Q. For currently-used systems
 18 that you support, is there an electronic
 19 repository that would contain system
 20 maps?

21 A. Yes.

22 Q. And where is that electronic
 23 repository?

24 A. It could be on a file

1 system.
 2 Q. How would you access it if
 3 you wanted to look for a system map?
 4 A. Well, I would talk to an
 5 individual who has knowledge of where
 6 that system map may be located, probably
 7 would have to acquire access to that data
 8 map, to that area, if it's a controlled
 9 environment. And --
 10 Q. Is there a shared -- I'm
 11 sorry. I didn't mean to interrupt you.
 12 I thought you were finished. Go ahead.
 13 A. And I would navigate through
 14 the system documentation, identify the
 15 data map or system map.
 16 Q. For eStar, who is the
 17 application service manager?
 18 A. Steve Aaronson.
 19 Q. The business partner?
 20 A. Ed Wong.
 21 Q. Can you spell that, W-O-N-G?
 22 A. W-O-N-G.
 23 Q. The business owner?
 24 A. Dana O'Brien. I'm sorry,

1 know, how do these documents get in --
 2 these so-called documents, that would be
 3 the data, the promotional material, you
 4 would also enter some indexing
 5 information about those materials.
 6 Q. As to documents, where do
 7 they come from?
 8 A. They would come from the
 9 person who authors that promotional
 10 material.
 11 Q. What group or team would
 12 author those materials?
 13 MR. TORREGROSSA: Objection,
 14 scope.
 15 THE WITNESS: I believe
 16 that's medical affairs.
 17 BY MR. SMITH:
 18 Q. What about the data, other
 19 data that I believe you said is used for
 20 indexing the documents; is that correct?
 21 A. I'm sorry, the question
 22 again?
 23 Q. Is there data that is used
 24 for indexing documents in eStar?

1 Dina. Dina O'Brien.
 2 Q. Type of information?
 3 MR. TORREGROSSA: I'm sorry?
 4 BY MR. SMITH:
 5 Q. Type of information
 6 contained in eStar?
 7 MR. TORREGROSSA: Yes, sir.
 8 THE WITNESS: That would be
 9 promotional materials that need to
 10 be tracked and reviewed.
 11 BY MR. SMITH:
 12 Q. In what format are documents
 13 in eStar?
 14 A. They're -- they can come in
 15 as a native format, such as Word. And
 16 the official type is a .pdf.
 17 Q. Are documents also created
 18 in eStar?
 19 A. No. They're submitted into
 20 eStar so that they can be reviewed and
 21 approved.
 22 Q. What are the data sources
 23 for eStar?
 24 A. If what you mean is, you

1 A. Yes.
 2 Q. Where does that data come
 3 from?
 4 A. That data would be in
 5 reference to the promotional materials,
 6 such as therapeutic area, drug, disease.
 7 Q. What fields does eStar
 8 contain?
 9 A. Drug and/or therapeutic
 10 area, title, target audience, target
 11 media.
 12 Q. Who's the vendor for eStar?
 13 A. AstraZeneca.
 14 Q. Strike that.
 15 I assume there are other
 16 fields that you can't remember off the
 17 top of your head in eStar other than the
 18 ones you mentioned?
 19 MR. TORREGROSSA: Objection.
 20 I'm sorry, Counsel. Objection to
 21 form.
 22 BY MR. SMITH:
 23 Q. Are there other fields than
 24 the ones you mentioned in eStar?

1 A. There may be others. Those
2 are the ones I remember.
3 Q. And the vendor is
4 AstraZeneca?
5 A. Yes.
6 Q. Do training materials exist
7 for eStar?
8 A. There are training
9 materials.
10 Q. Are there user training
11 materials?
12 A. Yes.
13 Q. Are there service training
14 materials?
15 MR. TORREGROSSA: I'm sorry,
16 I didn't hear the last part.
17 BY MR. SMITH:
18 Q. Are there service training
19 materials?
20 MR. TORREGROSSA: Thank you.
21 THE WITNESS: Yes.
22 BY MR. SMITH:
23 Q. Could you produce copies of
24 those materials?

1 MR. TORREGROSSA: Objection
2 to form.
3 THE WITNESS: Yes.
4 BY MR. SMITH:
5 Q. Is there system
6 documentation for eStar?
7 A. Yes.
8 Q. Could you produce copies of
9 the system documentation?
10 MR. TORREGROSSA: Objection
11 to form.
12 THE WITNESS: Yes.
13 BY MR. SMITH:
14 Q. Would the system
15 documentation for eStar, where would that
16 be maintained?
17 A. On file share.
18 Q. Whose file share? What file
19 share?
20 A. The IS function would own
21 that -- they don't own the server. They
22 own or control access to that particular
23 area, so it's a controlled area of the
24 server.

1 Q. How would you describe that
2 file share area? How would you identify
3 it or describe it?
4 A. I would describe it very
5 similar to what you find on, say, your
6 laptop. You create a folder. And you
7 can grant certain permissions and
8 privileges on that folder. And that
9 material would be stored beneath that
10 folder.
11 Q. Is there a list of the
12 persons who have permissions and
13 privileges for eStar?
14 A. For the training materials
15 and validation documentation, yes, there
16 would be a list of those individuals.
17 Q. No. People who would have
18 permissions to use the file share, have
19 access to the file share?
20 A. Yes.
21 Q. Would there be a list of
22 persons who have access to the eStar
23 system itself?
24 A. Yes.

1 Q. Could you provide me with a
2 copy of those lists?
3 MR. TORREGROSSA: Objection
4 to form.
5 THE WITNESS: Yes.
6 BY MR. SMITH:
7 Q. Can you access the file
8 share for eStar from your laptop if you
9 have an Internet connection?
10 A. Yes.
11 Q. Would you be able to click
12 on My Computer and find that file share?
13 A. No, it's not -- I mean, I
14 don't map the eStar validation folder on
15 my computer.
16 Q. How do you access the eStar
17 validation folder?
18 A. I would enter the server
19 address and the location of that -- or
20 the folder name.
21 Q. Is there a predecessor to
22 eStar?
23 A. Yes.
24 Q. What is the name of the

1 predecessor system?
2 A. STEP 2000.
3 Q. Was information from STEP
4 2000 migrated into eStar?
5 A. Yes.
6 Q. Was all of the data in STEP
7 2000 migrated into eStar?
8 A. No.
9 Q. What data was not migrated
10 into eStar?
11 A. Anything that was no longer
12 active promotional material.
13 Q. Is the material that is
14 promotional material that is no longer
15 active stored someplace else?
16 A. It may be on a disk or a CD.
17 Q. Who would be the custodian
18 of that?
19 A. I would expect that to be
20 Dina O'Brien.
21 Q. Could you make a copy of the
22 archived data?
23 A. Yes.
24 Q. In eStar, can you run

1 other information management system?
2 A. Yes.
3 Q. Which ones?
4 A. Market Pro.
5 Q. Market Pro?
6 A. Market Pro.
7 Q. Do you provide support for
8 Market Pro?
9 A. No.
10 Q. Does your department provide
11 support for Market Pro?
12 A. No.
13 Q. Which IS department provides
14 support for Market Pro?
15 A. I believe Mr. John Dowling
16 is the individual who has knowledge of
17 that system and the department provides
18 support.
19 Q. Do you know what type of
20 information can be passed from Market Pro
21 to eStar?
22 A. Yes.
23 Q. What kind?
24 A. .pdf of the promotional

1 queries?
2 A. You can search those
3 promotional information by those fields
4 that I described earlier, yes.
5 Q. Can you make reports of
6 those searches?
7 A. No.
8 Q. Are those queries or
9 searches saved somewhere?
10 A. No.
11 Q. Can you print out a report
12 from eStar?
13 A. No.
14 Q. Can you print out documents
15 from eStar?
16 A. Yes.
17 Q. Does eStar interface with
18 any electronic sources of information?
19 A. Well, one interface is the
20 ability to import an electronic document.
21 So an interface would be, you know, a
22 document that sits on a C drive somebody
23 authors.
24 Q. Does it interface with any

1 material.
2 Can I simply clarify that
3 earlier statement?
4 There is no push of
5 information from eStar to Market Pro.
6 It's not an automated interface whereby
7 data simply flows into Market Pro.
8 Q. How about information from
9 Market Pro into eStar?
10 A. No.
11 Q. But you can access
12 information in Market Pro from eStar; is
13 that correct?
14 MR. TORREGROSSA: Objection
15 to form.
16 THE WITNESS: Can you --
17 BY MR. SMITH:
18 Q. Can you import documents
19 from Market Pro into eStar?
20 A. I'm sorry, can I have the
21 question again, please?
22 Q. Yes.
23 Can you import documents
24 from Market Pro into eStar?