Confidential - Darryl Draper

		Page 393			Page 395
1	 A. GDMRS is one of those 		1	transportation. Manufacturer doesn't	
2	systems, seeing that they are this		2	necessarily understand or know that	
3	organization chart represents some of the		3	somebody's going to use it outside of its	
4	drug development functions. I would		4	intended purpose.	
5	assume a system also such as AZ IMPACT.		5	So you're asking me	
6	MR. SMITH: Thank you.		6	questions that, you know, individuals	
7	Could you mark this for me,		7	having access and using these systems and	
8	please.		8	do we support them, it's very, very	
9			9	difficult to give you answers to those	
10	(Deposition Exhibit No.		10	questions.	
11	Draper-11, Information Strategy,		11	Q. Can you give me an answer	
12	was marked for identification.)		12		
13	was marked for identification.)			for the two persons that you identified	
1	MD TODDECDOCCA: Com was an		13	in Exhibit 11?	
14	MR. TORREGROSSA: Can we go		14	A. I recognize these	
15	off the record while the witness		15	individuals as being IT former IT	
16	is looking at this.		16	people that were part of GDDIS who have	
17	MR. SMITH: Yes.		17	moved into the business. And I believe	
18			18	they're part of the organization not	
19	(A discussion off the record		19	called clinical information systems. And	
20	occurred.)		20	this appears to be information strategy,	
21			21	seems to be just kind of a think tank	
22	BY MR. SMITH:		22	team, if you want to call it that.	
23	Q. Do you know who information		23	Q. Okay.	
24	strategy is?		24	A. For that group.	
1			•		
1	A Con't on I recognize that	Page 394	1		Page 396
1 2	A. Can't say I recognize that	Page 394	1	Q. Thank you. Let me ask you	Page 396
2	name, information strategy.	Page 394	2	Q. Thank you. Let me ask you if you're familiar with a group called	Page 396
2 3	name, information strategy. Q. Or any of the people or	Page 394	2 3	Q. Thank you. Let me ask you if you're familiar with a group called clinical project coordination?	Page 396
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34 (Pages 393 to 396)

	P	age 397			Page 399
1	A. Susan Maw, M-A-W.		1	And does GDDIS support them?	
2	Q. Matrix		2	A. Yes.	
3	A. Can I just simply also state		3	Q. In what way?	
4	that clinical project coordination use		4	A. Again, the clinical project	
5	tools and technologies such as Microsoft		5	planning and forecasting system, Matrix.	
			_		
6	Project.		6	Q. Who in ISS would be	
7	Q. Are you familiar with a		7	responsible for would have those	
8	group called clinical outsourcing that		8	responsibilities?	
9	may be part of or connected with clinical		9	MR. TORREGROSSA: Objection,	
10	project coordination?		10	scope.	
11	A. Yes.		11	THE WITNESS: I	
12	Q. Okay. What does that group		12	BY MR. SMITH:	
13	do?		13	Q. Did I say ISS or GDDIS?	
14	MR. TORREGROSSA: Objection		14	I meant to say GDDIS.	
15	to form and scope.		15	GDDIS.	
16	BY MR. SMITH:		16	MR. TORREGROSSA: I withdraw	
17	Q. Briefly.		17	my objection.	
18	A. Again, their business		18	THE WITNESS: I don't know.	
19	function and process, I'm not going to		19	BY MR. SMITH:	
20	know or understand from an IT person.		20	Q. Who would know?	
21	Q. Do you know what IS services		21	A. Can I have the earlier	
22	your group provides to them?		22	question given back to me, please, by the	
23	A. Matrix.		23	court reporter.	
24	 Q. How about clinical agreement 		24	Q. I'll just rephrase it.	
1	_		i i		
		age 398		D 3 191 - C 4 -	Page 400
1	and grant management, are you familiar	Page 398	1	Responsibilities for the	Page 400
2	and grant management, are you familiar with that group?	Page 398	2	Matrix, providing Matrix support to the	Page 400
2 3	and grant management, are you familiar with that group? A. What was the group name	Page 398		Matrix, providing Matrix support to the people in ISS coordination, who in GDDIS	Page 400
2 3 4	and grant management, are you familiar with that group?	Page 398	2	Matrix, providing Matrix support to the people in ISS coordination, who in GDDIS would be the person responsible for that?	Page 400
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		Page 401			Page 403
1	delivery enablement.		1	MR. SMITH: We'll then skip	
2	Q. Study delivery enablement.		2	over that.	
3	I believe you've used that term before.		3	THE WITNESS: You don't have	
4	And GDDIS provides support		4	any other questions for LIMS,	
5	for that?		5	though? Yeah.	
6	A. To study delivery		6	BY MR. SMITH:	
7	enablement, yes.		7	Q. Is there anything you'd like	
8	Q. Yes. And what systems do		8	to say about LIMS? Just kidding.	
9	they use?		9	MR. TORREGROSSA: You're	
10	MR. TORREGROSSA: Objection		10	talking about the similar requests	
				· · · · · · · · · · · · · · · · · · ·	
11	to the form. Go ahead. And		11	you've made in the past, the same	
12	scope.		12	questions we've gone over.	
13	You can answer.		13	MR. SMITH: Yes, sir.	
14	THE WITNESS: Investigator		14	MR. TORREGROSSA: Yes, sir.	
15	safety letter process. It's		15	We'll look into those.	
16	called SAMSON.		16	BY MR. SMITH:	
17	BY MR. SMITH:		17	Q. What kind of support does	
18	Q. Is there a system that would		18	GDDIS provide for SAP?	
19	manage preclinical studies such as animal		19	MR. TORREGROSSA: I'm sorry,	
20	studies or laboratory studies?		20	SAP?	
21	A. Yes, there are preclinical		21	MR. SMITH: Yes.	
22	applications.		22	MR. TORREGROSSA: I have a	
23					
	Q. What system would do that?		23	scope objection. It was covered	
24	A. Preclinical. LIMS.		24	by Mr. Dowling.	
		Daga 403			Dago 404
1	O LIMS? Can you spell that	Page 402	1	You can answer	Page 404
1 2	Q. LIMS? Can you spell that,	Page 402	1	You can answer.	Page 404
2	please.	Page 402	2	I'm sorry, you said what	Page 404
2 3	please. A. L-I-M-S.	Page 402	2 3	I'm sorry, you said what support does GDDIS	Page 404
2 3 4	please. A. L-I-M-S. Q. L-I-M-S. And what does that	Page 402	2 3 4	I'm sorry, you said what support does GDDIS MR. SMITH: Yes.	Page 404
2 3 4 5	please. A. L-I-M-S. Q. L-I-M-S. And what does that stand for?	Page 402	2 3 4 5	I'm sorry, you said what support does GDDIS MR. SMITH: Yes. MR. TORREGROSSA: I withdraw	Page 404
2 3 4 5 6	please. A. L-I-M-S. Q. L-I-M-S. And what does that stand for? A. Laboratory information	Page 402	2 3 4 5 6	I'm sorry, you said what support does GDDIS MR. SMITH: Yes. MR. TORREGROSSA: I withdraw my objection.	Page 404
2 3 4 5 6 7	please. A. L-I-M-S. Q. L-I-M-S. And what does that stand for? A. Laboratory information management system.	Page 402	2 3 4 5 6 7	I'm sorry, you said what support does GDDIS MR. SMITH: Yes. MR. TORREGROSSA: I withdraw my objection. THE WITNESS: None.	Page 404
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į		D 405			Dage 407
1	to form and scope.	Page 405	1	A. Right.	Page 407
2	You can answer if you know.		2	Q. How about physicians that	
3	THE WITNESS: There may be		3	advise AstraZeneca on a drug such as	
4	patent information in GEL as it		4	Seroquel?	
5	relates to the submission.		5	MR. TORREGROSSA: Same	
6	BY MR. SMITH:		6	objections, form and scope.	
7			7	THE WITNESS: I don't know.	
1	Q. Anyplace else that you can think of?		0	BY MR. SMITH:	
8			8		
9	MR. TORREGROSSA: Same		9	Q. Okay. Where would one find	
10	objections.		10	minutes of a drug safety review	
11	THE WITNESS: No.		11	committee?	
12	BY MR. SMITH:		12	MR. TORREGROSSA: Same	
13	Q. Where would one find minutes		13	objection, form and scope.	
14	of meetings of the medical advisory panel		14	THE WITNESS: I don't know.	
15	for Seroquel?		15	BY MR. SMITH:	
16	MR. TORREGROSSA: Objection		16	Q. Do you understand what is	
17	to the form and to the scope.		17	meant by a drug safety review committee?	
18	THE WITNESS: Can I have the		18	A. I'm not sure I do.	
19	question again from the court		19	Q. Is there a committee within	
20	reporter.		20	AstraZeneca that reviews adverse events	
21			21	for a drug, for each drug?	
22	(The court reporter read the		22	MR. TORREGROSSA: Form and	
23	pertinent part of the record.)		23	scope.	
24			24	THE WITNESS: Again, those	
1		Page 406			Page 408
1	THE WITNESS: Assuming that	Page 406	1	are very husiness-oriented	Page 408
1 2	THE WITNESS: Assuming that	Page 406	1	are very business-oriented	Page 408
2	those materials would be	Page 406	2	questions, and I don't have	Page 408
2 3	those materials would be copyrighted by whatever	Page 406	2	questions, and I don't have knowledge of that.	Page 408
2 3 4	those materials would be copyrighted by whatever whatever group or organization	Page 406	2 3 4	questions, and I don't have knowledge of that. BY MR. SMITH:	Page 408
2 3 4 5	those materials would be copyrighted by whatever whatever group or organization that represents, they would I	Page 406	2 3 4 5	questions, and I don't have knowledge of that. BY MR. SMITH: Q. Getting down to the bottom	Page 408
2 3 4 5 6	those materials would be copyrighted by whatever whatever group or organization that represents, they would I assume have those materials.	Page 406	2 3 4 5 6	questions, and I don't have knowledge of that. BY MR. SMITH: Q. Getting down to the bottom of the pile here.	Page 408
2 3 4 5 6 7	those materials would be copyrighted by whatever whatever group or organization that represents, they would I assume have those materials. BY MR. SMITH:	Page 406	2 3 4 5 6 7	questions, and I don't have knowledge of that. BY MR. SMITH: Q. Getting down to the bottom of the pile here. Is there a list of the	Page 408
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		Page 409			Page 411
1	Q. Did you at any time have any		1	Q. EStar is utilized by medical	
2	direct involvement with GEL?		2	affairs?	
3	A. No.		3	MR. TORREGROSSA: Form and	
4	Q. Who is the application		4	scope.	
5	service manager for GEL?		5	THE WITNESS: Yes.	
6	A. Christine Gallia.		6	BY MR. SMITH:	
7	Q. And the predecessor for GEL,		7	Q. And that's supported by	
8	if there was one?		8	GDDIS then; is that correct?	
9	A. I think prior to GEL, it was		9	A. No.	
10	primarily, if not all, paper I don't		10	Q. Who supports eStar? BIS?	
11	believe that we had an electronic		11	A. Correct. The application	
12	library, per se, before GEL.		12	service manager provides delivery and	
13	Q. Is there an electronic		13	support.	
l	-			· · · · · · · · · · · · · · · · · · ·	
14	collection of pre-GEL documents today?		14	Q. Who's the head of BIS?	
15	A. Yes. They are in GEL. You		15	MR. TORREGROSSA: I will get	
16	can scan documents into GEL, so if they		16	you the current head of BIS.	
17	were paper, they		17	BY MR. SMITH:	
18	Q. Are you aware of any data		18	Q. Now, with regard to	
19	corruption or loss for GEL?		19	regulatory affairs, GEL supports	
20	A. No.		20	regulatory affairs. Right?	
21	Q. Does GDDIS provide support		21	A. Yes.	
22	to medical affairs?		22	Q. Do they use CLINTRACE?	
23	A. No.		23	MR. TORREGROSSA: Form,	
24	Q. Who does provide IS support		24	scope.	
	CARTE CONTROL OF THE			A A A A A A A A A A A A A A A A A A A	
		D 440	l		D 412
1	to them?	Page 410	1		Page 412
1 2	to them? A That would be RIS business	Page 410	1 2	Go ahead.	Page 412
2	A. That would be BIS, business	Page 410	2	Go ahead. THE WITNESS: No.	Page 412
2 3	A. That would be BIS, business IS.	Page 410	2 3	Go ahead. THE WITNESS: No. BY MR. SMITH:	Page 412
2 3 4	A. That would be BIS, business IS. Q. Who would be the person to	Page 410	2 3 4	Go ahead. THE WITNESS: No. BY MR. SMITH: Q. What systems do they use	Page 412
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	Page 413			Page 415
1	MR. TORREGROSSA: Form.	1	earlier. It's a medium for storing	
2	THE WITNESS: Again, your	2	information and documents.	
3	question was I mean, I'm	3	Q. Do you know when that came	
4	thinking of things like Office	4	into use?	
5	Tools, e-room.	5	A. 2002, possibly earlier, a	
6	BY MR. SMITH:	6	year or so, around the time of the	
7	Q. What's e-room?	7	merger.	
8	A. It's like a file system.	8	Q. Do you know if it is, for	
9	Q. What type of system, what	9	lack of a better term, cleaned out	
10	sort of software does e-room use?	10	periodically?	
11	A. It's called e-room.	11	MR. TORREGROSSA: Objection	
12	Q. Is that the name of an	12	to form.	
13	application?	13	THE WITNESS: I would tend	
14	A. It's the name of it's	14	to believe that anything	
15	like Windows. It simply allows you to	15	MR. TORREGROSSA: And scope,	
16	visualize documents on a file share.	16	go ahead.	
17	Q. And that's used by drug	17	THE WITNESS: that is	
18	safety?	18	required to be retained by	
19	MR. TORREGROSSA: Form and	19	AstraZeneca would be retained.	
20		20	There's no automated cleaning	
21	scope. THE WITNESS: I don't know.	21	process whereby things would	
22	BY MR. SMITH:	22	expire and disappear or be	
23	Q. Does GDDIS provide support	23	removed.	
24	for e-room?	24	BY MR. SMITH:	
1	Page 414			Page 416
1	Page 414 A. We provide very limited	1	O. And is there a backup for	Page 416
1 2	A. We provide very limited	1 2	Q. And is there a backup for e-room?	Page 416
2	A. We provide very limited support. The primary support for that	2	e-room?	Page 416
2	A. We provide very limited support. The primary support for that technology comes from IT services.	2 3	e-room? A. There is a backup of the	Page 416
2 3 4	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about	2 3 4	e-room? A. There is a backup of the underlying hardware for e-room which	Page 416
2 3 4 5	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of	2 3 4 5	e-room? A. There is a backup of the underlying hardware for e-room which contains the data.	Page 416
2 3 4 5 6	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to	2 3 4 5 6	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data	Page 416
2 3 4 5 6 7	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you?	2 3 4 5 6 7	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room?	Page 416
2 3 4 5 6 7 8	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those	2 3 4 5 6 7 8	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes.	Page 416
2 3 4 5 6 7 8	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions.	2 3 4 5 6 7 8	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room	Page 416
2 3 4 5 6 7 8 9	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions. Q. Okay. Do you know whether	2 3 4 5 6 7 8 9	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room for clinical studies, the group clinical	Page 416
2 3 4 5 6 7 8 9 10	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions. Q. Okay. Do you know whether you can download documents from e-room?	2 3 4 5 6 7 8 9 10	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room for clinical studies, the group clinical studies?	Page 416
2 3 4 5 6 7 8 9 10 11 12	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions. Q. Okay. Do you know whether you can download documents from e-room? MR. TORREGROSSA: I didn't	2 3 4 5 6 7 8 9 10 11	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room for clinical studies, the group clinical studies? A. Again, you're asking me a	Page 416
2 3 4 5 6 7 8 9 10 11 12 13	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions. Q. Okay. Do you know whether you can download documents from e-room? MR. TORREGROSSA: I didn't catch one part. Into or	2 3 4 5 6 7 8 9 10 11 12 13	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room for clinical studies, the group clinical studies? A. Again, you're asking me a question that's very similar to what I	Page 416
2 3 4 5 6 7 8 9 10 11 12 13 14	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions. Q. Okay. Do you know whether you can download documents from e-room? MR. TORREGROSSA: I didn't catch one part. Into or MR. SMITH: From.	2 3 4 5 6 7 8 9 10 11 12 13 14	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room for clinical studies, the group clinical studies? A. Again, you're asking me a question that's very similar to what I tried to explain earlier, what is	Page 416
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions. Q. Okay. Do you know whether you can download documents from e-room? MR. TORREGROSSA: I didn't catch one part. Into or MR. SMITH: From. MR. TORREGROSSA: From.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room for clinical studies, the group clinical studies? A. Again, you're asking me a question that's very similar to what I tried to explain earlier, what is there's a service, and how and when it's	Page 416
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions. Q. Okay. Do you know whether you can download documents from e-room? MR. TORREGROSSA: I didn't catch one part. Into or MR. SMITH: From. MR. TORREGROSSA: From. Sorry.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room for clinical studies, the group clinical studies? A. Again, you're asking me a question that's very similar to what I tried to explain earlier, what is there's a service, and how and when it's used is a business decision.	Page 416
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions. Q. Okay. Do you know whether you can download documents from e-room? MR. TORREGROSSA: I didn't catch one part. Into or MR. SMITH: From. MR. TORREGROSSA: From. Sorry. THE WITNESS: I can download	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room for clinical studies, the group clinical studies? A. Again, you're asking me a question that's very similar to what I tried to explain earlier, what is there's a service, and how and when it's used is a business decision. Q. Well, maybe you can answer	Page 416
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions. Q. Okay. Do you know whether you can download documents from e-room? MR. TORREGROSSA: I didn't catch one part. Into or MR. SMITH: From. MR. TORREGROSSA: From. Sorry. THE WITNESS: I can download	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room for clinical studies, the group clinical studies? A. Again, you're asking me a question that's very similar to what I tried to explain earlier, what is there's a service, and how and when it's used is a business decision. Q. Well, maybe you can answer	Page 416
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions. Q. Okay. Do you know whether you can download documents from e-room? MR. TORREGROSSA: I didn't catch one part. Into or MR. SMITH: From. MR. TORREGROSSA: From. Sorry. THE WITNESS: I can download a document from a file share to my	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room for clinical studies, the group clinical studies? A. Again, you're asking me a question that's very similar to what I tried to explain earlier, what is there's a service, and how and when it's used is a business decision. Q. Well, maybe you can answer this question.	Page 416
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions. Q. Okay. Do you know whether you can download documents from e-room? MR. TORREGROSSA: I didn't catch one part. Into or MR. SMITH: From. MR. TORREGROSSA: From. Sorry. THE WITNESS: I can download a document from a file share to my C drive, yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room for clinical studies, the group clinical studies? A. Again, you're asking me a question that's very similar to what I tried to explain earlier, what is there's a service, and how and when it's used is a business decision. Q. Well, maybe you can answer this question. Is e-room an	Page 416
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions. Q. Okay. Do you know whether you can download documents from e-room? MR. TORREGROSSA: I didn't catch one part. Into or MR. SMITH: From. MR. TORREGROSSA: From. Sorry. THE WITNESS: I can download a document from a file share to my C drive, yes. BY MR. SMITH:	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room for clinical studies, the group clinical studies? A. Again, you're asking me a question that's very similar to what I tried to explain earlier, what is there's a service, and how and when it's used is a business decision. Q. Well, maybe you can answer this question. Is e-room an AstraZeneca-wide thing that's used by	Page 416
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions. Q. Okay. Do you know whether you can download documents from e-room? MR. TORREGROSSA: I didn't catch one part. Into or MR. SMITH: From. MR. TORREGROSSA: From. Sorry. THE WITNESS: I can download a document from a file share to my C drive, yes. BY MR. SMITH: Q. I guess you can upload or	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room for clinical studies, the group clinical studies? A. Again, you're asking me a question that's very similar to what I tried to explain earlier, what is there's a service, and how and when it's used is a business decision. Q. Well, maybe you can answer this question. Is e-room an AstraZeneca-wide thing that's used by everybody, or do different department	Page 416
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. We provide very limited support. The primary support for that technology comes from IT services. Q. If I had questions about backing up e-room or making copies of data in e-room, I should direct those to IT rather than to you? A. You can ask me those questions. Q. Okay. Do you know whether you can download documents from e-room? MR. TORREGROSSA: I didn't catch one part. Into or MR. SMITH: From. MR. TORREGROSSA: From. Sorry. THE WITNESS: I can download a document from a file share to my C drive, yes. BY MR. SMITH: Q. I guess you can upload or download documents in e-room. Right?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	e-room? A. There is a backup of the underlying hardware for e-room which contains the data. Q. Is there backup of the data in e-room? A. Yes. Q. Is there a separate e-room for clinical studies, the group clinical studies? A. Again, you're asking me a question that's very similar to what I tried to explain earlier, what is there's a service, and how and when it's used is a business decision. Q. Well, maybe you can answer this question. Is e-room an AstraZeneca-wide thing that's used by everybody, or do different department have separate E. Rooms?	Page 416

I					
_		Page 417		and a second sec	Page 419
1	Q. Are there various servers,		1	separate questions.	
2	are there separate independent servers		2	Do they exist?	
3	for different departments?		3	MR. TORREGROSSA: Objection	
4	A. No.		4	to form and also to the scope to	
5	Q. What can you tell me about		5	the extent it's calling for legal	
6	voice mail for drug safety? Do they use		6	retention testimony.	
7	voice mail?		7	Go ahead.	
8	MR. TORREGROSSA: Objection		8	BY MR. SMITH:	
9	to form.		9	Q. I'm not asking you for	
10	THE WITNESS: Yes.		10	anything your lawyers told you. I just	
11	BY MR. SMITH:		11	want to know if the old voice mails,	
12	Q. Is it archived?		12	after 10 days, if they exist?	
13	A. Sorry?		13	MR. TORREGROSSA: Same	
14	 Q. Is voice mail in drug safety 		14	objections.	
15	archived in some fashion?		15	Go ahead.	
16	A. No.		16	THE WITNESS: No.	
17	Q. Would GDDIS be responsible		17	BY MR. SMITH:	
18	for it if it were?		18	Q. I just want to follow up on	
19	MR. TORREGROSSA: Objection		19	a question I asked you yesterday.	
20	to form.		20	My understanding is that you	
21	BY MR. SMITH:		21	don't have a job description, a	
22	Q. Strike the question.		22	description of your objectives or a	
23	What responsibilities does		23	performance review or any other documen	nt
24	GDDIS have for voice mail pertaining to		24	that would list your job	
		B 440			D=== 420
١.	dure cofet 2	Page 418	,	responsibilities, is that sorrest?	Page 420
$\begin{vmatrix} 1 \\ 2 \end{vmatrix}$	drug safety?		1	responsibilities; is that correct? MR. TORREGROSSA: Form.	
2	A. None.		2		
3	Q. Who handles the voice mail?		3	BY MR. SMITH:	
4	Who services it?		4 5	Q. Do you want it read back?	
5	A. IBM.		1	A. Yes, please.	
6	Q. Do you know how long voice		6 7	/The court reporter read the	
7	mails in drug safety are ordinarily		۱ ـ	(The court reporter read the	
8	retained?		8	pertinent part of the record.)	
9	A. Ordinarily they would be		9	THE WITTHESS. No	
10	retained, the system would retain them		1 1 (1	THE WITNESS: No.	
	·				
11	for 10 days.		11	BY MR. SMITH:	
11 12	Q. After 10 days, would they be		11 12	BY MR. SMITH: Q. It's not correct.	
11 12 13	Q. After 10 days, would they be archived?		11 12 13	BY MR. SMITH: Q. It's not correct. How is it incorrect?	
11 12 13 14	Q. After 10 days, would they be archived? A. No.		11 12 13 14	BY MR. SMITH: Q. It's not correct. How is it incorrect? A. I have performance reviews	
11 12 13 14 15	Q. After 10 days, would they be archived? A. No. Q. Would they be erased?		11 12 13 14 15	BY MR. SMITH: Q. It's not correct. How is it incorrect? A. I have performance reviews that will have not direct not directly	
11 12 13 14 15 16	Q. After 10 days, would they be archived? A. No. Q. Would they be erased? MR. TORREGROSSA: Objection		11 12 13 14 15 16	BY MR. SMITH: Q. It's not correct. How is it incorrect? A. I have performance reviews that will have not direct not directly listing every single application that I'm	
11 12 13 14 15 16 17	Q. After 10 days, would they be archived? A. No. Q. Would they be erased? MR. TORREGROSSA: Objection to form.		11 12 13 14 15 16 17	BY MR. SMITH: Q. It's not correct. How is it incorrect? A. I have performance reviews that will have not direct not directly listing every single application that I'm responsible for, but in general, the role	
11 12 13 14 15 16 17 18	Q. After 10 days, would they be archived? A. No. Q. Would they be erased? MR. TORREGROSSA: Objection to form. THE WITNESS: They are no		11 12 13 14 15 16 17 18	BY MR. SMITH: Q. It's not correct. How is it incorrect? A. I have performance reviews that will have not direct not directly listing every single application that I'm responsible for, but in general, the role requires certain activities and	
11 12 13 14 15 16 17 18 19	Q. After 10 days, would they be archived? A. No. Q. Would they be erased? MR. TORREGROSSA: Objection to form. THE WITNESS: They are no longer retrievable by the owner of		11 12 13 14 15 16 17 18 19	BY MR. SMITH: Q. It's not correct. How is it incorrect? A. I have performance reviews that will have not direct not directly listing every single application that I'm responsible for, but in general, the role requires certain activities and responsibilities, behaviors, so on and so	
11 12 13 14 15 16 17 18 19 20	Q. After 10 days, would they be archived? A. No. Q. Would they be erased? MR. TORREGROSSA: Objection to form. THE WITNESS: They are no longer retrievable by the owner of the mailbox or the system		11 12 13 14 15 16 17 18 19 20	BY MR. SMITH: Q. It's not correct. How is it incorrect? A. I have performance reviews that will have not direct not directly listing every single application that I'm responsible for, but in general, the role requires certain activities and responsibilities, behaviors, so on and so forth, and those are listed. So I do	
11 12 13 14 15 16 17 18 19 20 21	Q. After 10 days, would they be archived? A. No. Q. Would they be erased? MR. TORREGROSSA: Objection to form. THE WITNESS: They are no longer retrievable by the owner of the mailbox or the system administrator.		11 12 13 14 15 16 17 18 19 20 21	BY MR. SMITH: Q. It's not correct. How is it incorrect? A. I have performance reviews that will have not direct not directly listing every single application that I'm responsible for, but in general, the role requires certain activities and responsibilities, behaviors, so on and so forth, and those are listed. So I do have performance review information.	
11 12 13 14 15 16 17 18 19 20 21 22	Q. After 10 days, would they be archived? A. No. Q. Would they be erased? MR. TORREGROSSA: Objection to form. THE WITNESS: They are no longer retrievable by the owner of the mailbox or the system administrator. BY MR. SMITH:		11 12 13 14 15 16 17 18 19 20 21 22	BY MR. SMITH: Q. It's not correct. How is it incorrect? A. I have performance reviews that will have not direct not directly listing every single application that I'm responsible for, but in general, the role requires certain activities and responsibilities, behaviors, so on and so forth, and those are listed. So I do have performance review information. Q. And that will list some	
11 12 13 14 15 16 17 18 19 20 21 22 23	Q. After 10 days, would they be archived? A. No. Q. Would they be erased? MR. TORREGROSSA: Objection to form. THE WITNESS: They are no longer retrievable by the owner of the mailbox or the system administrator. BY MR. SMITH: Q. Are they retrievable by		11 12 13 14 15 16 17 18 19 20 21 22 23	BY MR. SMITH: Q. It's not correct. How is it incorrect? A. I have performance reviews that will have not direct not directly listing every single application that I'm responsible for, but in general, the role requires certain activities and responsibilities, behaviors, so on and so forth, and those are listed. So I do have performance review information. Q. And that will list some systems or applications that you're	
11 12 13 14 15 16 17 18 19 20 21 22	Q. After 10 days, would they be archived? A. No. Q. Would they be erased? MR. TORREGROSSA: Objection to form. THE WITNESS: They are no longer retrievable by the owner of the mailbox or the system administrator. BY MR. SMITH:		11 12 13 14 15 16 17 18 19 20 21 22	BY MR. SMITH: Q. It's not correct. How is it incorrect? A. I have performance reviews that will have not direct not directly listing every single application that I'm responsible for, but in general, the role requires certain activities and responsibilities, behaviors, so on and so forth, and those are listed. So I do have performance review information. Q. And that will list some	

1	. M. J				
		Page 421			Page 423
1	 A. That will list activities 		1	THE WITNESS: Did I	
2	that I was involved in, maybe systems		2	understand	
3	listed in there during a particular		3	BY MR. SMITH:	
4	performance period.		4	Q. I hope so.	
5	I also want to say that		5	A. Did I understand the	
6	there are job descriptions for our		6	question correctly?	
7	department that list roles and		7	Q. The question was, did your	
8	responsibilities.		8	lawyer tell you to send a letter to your	
9	Q. Okay. And there would be in		9	colleagues requesting a meeting but	
10	your department a description of your job		10	asking them not to send you any or bring	
11	roles and responsibilities, is that what		11	you any documents about their systems?	
12	you're saying?		12	MR. TORREGROSSA: Don't	
13	A. The information that you're		13	answer that. That's privileged,	
14	referring to is typically held and		14	• • •	
15	÷ '' '			and that was not the question that	
16	maintained by human resources.		15	was asked.	
1	Q. But it exists?		16	MR. SMITH: Well, I think it	
17	A. Yes, yes.		17	was, but we'll let the court	
18	Q. In your meeting request to		18	reporter be the arbiter and ask	
19	your colleagues, did you specifically ask		19	her to read back the question.	
20	them not to send or bring you any		20		
21	documents about their systems?		21	(The court reporter read the	
22	MR. TORREGROSSA: Don't		22	pertinent part of the record.)	
23	answer that. That request was		23		
24	privileged or at the direction of		24	BY MR. SMITH:	
					
		Daga 422			Dago 474
1	councel	Page 422	4	O Do you still have the notes	Page 424
1	counsel.	Page 422	1	Q. Do you still have the notes	Page 424
2	BY MR. SMITH:	Page 422	2	that you made when you met with your	Page 424
2	BY MR. SMITH: Q. Are you refusing to answer	Page 422	2	that you made when you met with your colleagues in preparation for this	Page 424
2 3 4	BY MR. SMITH: Q. Are you refusing to answer that question then?	Page 422	2 3 4	that you made when you met with your colleagues in preparation for this deposition?	Page 424
2 3 4 5	BY MR. SMITH: Q. Are you refusing to answer that question then? MR. TORREGROSSA: You're	Page 422	2 3 4 5	that you made when you met with your colleagues in preparation for this deposition? MR. TORREGROSSA: You can	Page 424
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		Page 425			Page 427
1	questions I have.		1	CERTIFICATE	
2	MR. TORREGROSSA: Counsel		2		
3	for Lilly, any questions?		3 4	I HEREBY CERTIFY that the	
4	MS. THOMAS: No.		5	witness was duly sworn by me and that the	
5	MR. TORREGROSSA: We will		6	deposition is a true record of the	
6	read and sign. We would like to		7	testimony given by the witness.	
7	mark the cross-notices of this		8		
8	deposition as Draper-12 and ask		9		
9	the court reporter to put the		10	ANNUAL DEFENSE OF THE PROPERTY	
10	state case cross-notices on the		4.4	ANN MARIE MITCHELL, a Federally Approved	
11	caption.		11	Certified Realtime Reporter, Registered Diplomate Reporter and Notary Public	
12	COURT REPORTER: All of		12	Dated: May 21, 2007	
13	them?		13	24334. 114, 22, 233,	
14	MR. TORREGROSSA: Please.		14		
15	And we would note for the		15	(The foregoing certification	
16	record that at this time we would			of this transcript does not apply to any	
17	allow other counsel to ask		16	reproduction of the same by any means, unless under the direct control and/or	
18	questions, but Tom Mellon from the		17	supervision of the certifying reporter.)	
19	Scheller firm is not here, nor are		18	supervision of the certifying reporter.)	
20	any other counsel.		19		
21	MR. SMITH: When I say		20		
22	that's all the questions I have at		21		
23	this time, I'm not concluding the		22		
24	deposition, I'm suspending the		23 24		
ļ					
	A	Page 426		INCTRUCTIONS TO WITHESS	Page 428
1 2	deposition, because I think we're		1	INSTRUCTIONS TO WITNESS	
2	going to have some matters to take		2	DI 1 1 11	
3	up with the magistrate.		3	Please read your deposition	
4	MR. TORREGROSSA: And of		4	over carefully and make any necessary	
5	course our position is this		5	corrections. You should state the reason	
6	deposition is closed.		6	in the appropriate space on the errata	
7			7	sheet for any corrections that are made.	
8	(Deposition Exhibit No.			Attor doing co. plagga cian	
9	• •		8	After doing so, please sign	
1	Draper-12, Packet of		9	the errata sheet and date it.	
10	Draper-12, Packet of Cross-Notices, was marked for		9 10	the errata sheet and date it. You are signing same subject	
10 11	Draper-12, Packet of		9 10 11	the errata sheet and date it. You are signing same subject to the changes you have noted on the	
10 11 12	Draper-12, Packet of Cross-Notices, was marked for identification.)		9 10	the errata sheet and date it. You are signing same subject to the changes you have noted on the errata sheet, which will be attached to	
10 11 12 13	Draper-12, Packet of Cross-Notices, was marked for identification.) (Deposition adjourned at		9 10 11 12 13	the errata sheet and date it. You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.	
10 11 12	Draper-12, Packet of Cross-Notices, was marked for identification.)		9 10 11 12 13 14	the errata sheet and date it. You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition. It is imperative that you	
10 11 12 13 14 15	Draper-12, Packet of Cross-Notices, was marked for identification.) (Deposition adjourned at		9 10 11 12 13 14 15	the errata sheet and date it. You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition. It is imperative that you return the original errata sheet to the	
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2	PAGE LINE CHANGE		3			
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22 23			22 23			
24			24			
	Pa	ge 430				
1 2	ACKNOWLEDGMENT OF DEPONENT					
3	I,, do hereby certify that I have read the foregoing pages, 261 - 428, and that the					
4	same is a correct transcription of the answers given by me to the questions	:				
5	therein propounded, except for the corrections or changes in form or					
6	substance, if any, noted in the attached Errata Sheet.					
7 8						
9	DARRYL DRAPER DATE					
1	Subscribed and sworn to before me this					
12	day of, 20					
	My commission expires:					
14	Notary Public					
15 16						
17 18 19						
20 21						
22 23						
24						