

# EXHIBIT

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**From:** Dupre, Andrew [mailto:ADupre@McCarter.com]  
**Sent:** Monday, July 02, 2007 7:50 PM  
**To:** Pederson, Mike; Jaffe, Jonathan; Rhonda Radliff  
**Cc:** Torregrossa, Brennan; McConnell, Stephen; Tony Winchester; Jim Freebery; Windfelder, Makenzie  
**Subject:** Database Survey

Michael:

Attached please find a copy of the survey sheet regarding databases. This sheet has been the subject of a letter exchange between Paul Pennock and Steve McConnell. Some caveats are important here:

1. This represents AZ's effort to compile information in an informal way, from the notes of depositions and by asking general questions. This sheet is not intended to be a verified response to which AZ could swear, i.e. like a response to an RFP. Instead, this sheet represents AZ's effort to quickly collect general information to support a meet/confer process.
2. AZ's investigation is ongoing. Time would allow it to fill in more of the empty spaces.
3. As a general matter, many of these databases duplicate each other. AZ expects the meet/confer process to settle on the best way of getting the information for which you really are looking into Plaintiffs' hands.
4. Provision of this list is not a promise to produce any database. AZ reserves the right to object to production of any database.
5. This list is subject to the confidentiality provisions of the relevant court orders.
6. The time estimates are really estimates, not promises or deadlines.

(D) indicates information taken from a deposition.

Please call Brennan Terragrossa if you would like to discuss database discovery. I am happy to be on the call if it would be helpful. Have a nice holiday-

<<AZ Seroquel 7-2-07 Database Chart to Plaintiffs.XLS>>

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#	System	Data Range of Data	Size of Database (Megabytes)	Data Map or schema or systems diagram	User Type & # (PGs, Med Admins, Clinical, generally who/where)	Training Materials (most recent and/or original (dates) doc name.pdf)	System documentation, (eg, verified system docs, recovery docs, DBA docs)	Data Dictionary	AZ or Vendor Maintained?	Documentation readily available in less than 1 week?	Documentation readily available in less than 2 weeks?	Documentation readily available in more than 2 weeks?
	EXAMPLE answers	1996 - Present	1,000 MB	ERD (Date) doc name.pdf	1000 users: Sales teams	doc name.pdf	Verified system doc (date) doc name.pdf	Yes (as of date) doc name.pdf	AZ		Y	
	AMOS	(D) 2000 - 2006	20 GB	Maybe Information al	(D) clinical data management organization	AZ Sweden		None	AZ			Y
	AZ Impact	2000 - Present	256 GB	None	Marketing companies	None	Back-up discussed - reference to docs not yet found	None	Vendor			Y
	AZ Academy	(D) 2001 - Present		Possibly (D)		Possibly (D)	Possibly (D)	Possibly (D)				
	AZER	2002 - Present	Very Large - Creates 150,000 expense reports annually	(D) Yes	AZ employees (D) Yes, AZ							
	CANDA											
	CLINTRACE	1998 - Present	133 GB	Yes	Drug Safety	Yes, AZ	Produced to Plaintiffs on June 8, 2007	Yes	Vendor			Y
	COMPASS	1994 - 2006	1.89 TB	Yes	Sales	Yes	Yes	Yes				
	COOL	(D) 2001 - Present	3 GB	Yes	Clinical management			None	AZ			Y
	Corporate Intranet & Public Internet Websites											
	CRF/DEN	1995 - Present	8 GB	Yes	Clinical management	Yes		Yes	AZ		Y	
	CSTP	2003 - Present (D)		Yes	Sales (D)	Yes	Yes	Yes				
	CT Reports											
	CTM	1998-2000 replaced by AZ impact 2001-2006		Most likely not available but if it were it would be archived (D)	Same people who use AZ impact (D)	Y/Archives	Oracle	Most likely not available but if it were it would be archived (D)				
	DASHBOARD	replaced by Touchstone (D)			Sales (D)							Y
	Data Warehouse - Cornerstone		141b		Most people use it is a exactly that a data warehouse (D)		System Back Up (D)				Y	
	DIPLOMAT	1992 - 2004			Clinical Trial Management (D)	Archived		No	AZ			Y

Request too broad - requires clarification of what Plaintiffs actually want.

Not clear what Plaintiffs want here - seems to be info housed in another named database.

DIRM	1997 - Present 2000 - Present (D) if replaced CANADA (D)	Yes (D)	Clinical Trial Management (D) Regulatory Affairs (D)	System is backed up (D)		AZ	Y	Y
ECTD	This is similar to a virtual bulletin board		Commercial (D)					Y
EROOM								
ESTAR (Electronic Submission Tracking & Review)	2000	5 GB	Brand Team, PRA Team (medical/legal/P RA)	eSTAR 2.3 User Requirements Specification for eSTAR 2.3.doc				Y
FIELD COACHING FORM	2005 - Present 2000 - (D)			Training documentation on DSM (D)		AZ	Y	
GDMRS								
GEL	Some scanned documents from 1996. DB migrated in 2000	No ERD. ERD exists for SLIM, which tracks how docs are used	Global Regulatory, 10,000 world wide	Generic, on-line and comp. based training at major sites	Yes- for underlying oracle, but not for GEL specifically	AZ		Y
GESISS	July 2005 - Present	No	Drug safety	Drug Safety does the training	No	AZ	Y	
ICON	1997-2005	30 tables			Yes			Y
IIRIS	2001 - Present	5 gigs- 1/5 is seroquel at v3.3	Clinical: 270 users- filed scientists and some drug safety	Process manuals with instructions	Yes		Y	
IMS Data INSITE			Provides weekly/monthly prescription reports					
KNOWBOL LECTURE BUREAU EXPRESS (LBX)	2000 - Present		IC dept. enters docs (D)					Y
LIMS	2005 - Present (D) 1991 - Present	Data Map		Samples		Vendor AZ		Y
LOTUS (ASTRA)								
MACS	April 2004 - Present (D)	Perhaps (D)	Sales, Medical Affairs					Y
MARKET PRO	Jan 2005 - Present (D)		Promotions and Marketing	Yes				
NICE		Local database - 350 doctors at one time	Call Center					
NORTHSTAR	2000 - 2006							

Sales insite is the correct name - see below.

Needs Clarification - has not been used for many years



