

EXHIBIT

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May 31, 2007

Michael Pederson, Esq.
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Re: Attempt to Agree to Resolution of Plaintiffs' Technical Issues

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Dear Mike:

AstraZeneca took the following action items from yesterday's conference. AstraZeneca understands that resolution of most or all of these items will eliminate any need for an evidentiary hearing on June 13, 2007.

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1. **Load File:** AstraZeneca will provide a supplemental production of modified load and LFP files for the first 14 custodial productions, containing a new Bates numbering convention. The new Bates convention shall be AZSER#####. The new convention shall be used on all future productions, beginning with balance of production due June 11, 2007. We have already informed the vendor of this necessary change and the importance of consistency in labeling going forward. **Status: Resolved.**

2. **Page Breaks:** Plaintiffs request that AstraZeneca provide page breaks in extracted text files of documents greater than 10 pages in length which have not previously been OCR'd and produced pursuant to CMO2 III.A.1. AstraZeneca disagrees that the industry standard is to provide such page breaks, or that the Federal Rules of Civil Procedure or CMO2 require AstraZeneca to do so. In fact, AstraZeneca is informed that the majority of litigation support production vendors do not insert page breaks into extracted text files, because the opposing party can determine from the accompanying TIFF file the page number of any search term. Notwithstanding, we acknowledge Plaintiffs' concerns with page breaks and will do everything reasonably within our control to resolve this issue.

Jonathan Jaffe has proposed a possible page break insertion method utilizing a Windows generic text print metrics driver. AstraZeneca's production vendor has previously stated that this method will not reliably create page breaks matching those in the produced TIFF. However, Plaintiffs agreed yesterday that they will accept the error rate that will result from this proposed solution. AstraZeneca will therefore immediately engage its production vendor to quantify the costs and work necessary to actualize this proposal. As an alternative, Plaintiffs also stated they would be satisfied with receiving the native files that underlie these documents (without metadata, of course). AstraZeneca will also explore that solution. Finally, our vendor indicates that OCR'd native files (as opposed to TIFFs) results in greater

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than 90% accuracy and could provide another possible solution to Plaintiff's concerns related to searching. **Status: AstraZeneca is exploring Jonathan Jaffe's proposal with its production vendor today and will report back to Plaintiffs.**

3. **Spot Check Swap Fields** - Jonathan Jaffe will provide AstraZeneca a list of examples of this issue. AstraZeneca will spot check the first document of each load file in each folder of each hard drive produced to date. The load file fields will be compared to the objective coding metadata fields on the TIFF image for the same document. The purpose of this spot check is to determine whether the load file fields match the TIFF file fields for each folder on each produced hard drive. AstraZeneca will notify Plaintiffs of inconsistencies between the two document file types. AstraZeneca has already notified its vendor of the importance of this issue going forward. **Status: Resolved.**

4. **Excel Spreadsheets**: The parties agree that changing Excel spreadsheets to TIFF is inherently difficult, as Excel spreadsheets, particularly large spreadsheets containing extensive data, are not generally meant to be displayed on 8 1/2 x 11 paper. This issue is a well known problem of conducting ediscovery. Despite this, AstraZeneca will, consistent with Plaintiffs' request, increase the level of QC with respect to TIFFing of Excel spreadsheets. Additionally, AstraZeneca is happy to go back and attempt to re-TIFF problem documents specifically identified by Plaintiffs, to obtain more user friendly recreations of the spreadsheets. **Status: Resolved.**

5. **Privilege Logs**: AstraZeneca will provide privilege logs on a schedule faster than the 120 days after production deadline that is accorded to it by CMO2. AstraZeneca will identify documents withheld for privilege by Bates ranges. Because these documents are not being produced, but rather are being withheld pursuant to legal privileges, we have given these documents a slightly different Bates labeling convention. As opposed to AZSER#####, these documents have been designated as AZSERP#####. This difference helps AstraZeneca avoid inadvertent production of privileged documents. Because Plaintiffs will not be loading these privileged documents into a document management system (because they will not be produced), AstraZeneca believes this convention creates no problems. Documents pulled from the privilege log and subsequently produced will be given a production Bates label that uses the standard Bates convention. In other words, all documents produced to Plaintiffs will be Bates stamped according to the convention agreed per item #1 above. Please let us know as soon as possible if Plaintiffs perceive a problem with this plan. The new privilege logs will also contain the field "Custodian." **Status: Resolved.**

6. **Custodian Source Names**: the parties agree that this is a non-issue. **Status: Resolved.**

7. Line by line redactions: AstraZeneca has to date coded "reasons for redactions" in the meta-data on a document basis, and disagrees that it is required to provide line-by-line redaction reason identification, but is nonetheless willing to work with Plaintiffs on this issue. To be clear, AstraZeneca does not possess a line-by-line reason for redaction for its internal use, and any such mechanism would have to be created from scratch and superimposed onto prior productions. Plaintiffs will provide a report of all documents that contain redactions for more than one reason. The parties will then meet and confer to decide which of these documents, if any, Plaintiffs believe require more specific information. **Status: Resolved.**

8. Objective coding fields: AstraZeneca and Plaintiffs negotiated 19 fields that would be produced for each document in a load file. Each of those 19 fields was agreed to by both parties and subsequently included in an order - CMO2. AstraZeneca disagrees that it is required to provide objective coding fields beyond those negotiated, agreed, and defined in CMO2. Moreover, AstraZeneca's coding of documents for its own use is privileged attorney work product. However, if Plaintiffs desire specific objective coding fields beyond those listed in CMO2, please name them and AstraZeneca will consider the demand purely as a compromise. **Status: Plaintiffs will identify what specific additional information would be helpful. AstraZeneca will investigate what additional information, if any, is available for hard copy documents that have been scanned and produced as TIFFs.**

9. IP7 Issue: the parties agree that this issue is resolved. **Status: Resolved.**

10. IP10 Issue: the parties agree that this issue will be resolved by creation of new load files as stated in #1 above. **Status: Resolved.**

11. Blank documents: AstraZeneca explained that these documents are usually backgrounds to email (i.e. decorative attachments of flowers, patterns, etc.). This issue was previously addressed in Jim Freebery's letter of April 30, 2007. AstraZeneca will, pursuant to Plaintiffs' request, provide a sample list of these types of problems. Other potential blank documents will be identified by Plaintiffs and dealt with on an ad hoc basis. **Status: Resolved.**

12. Foreign language documents: AstraZeneca has produced a hard drive containing all foreign language documents for all 80 custodians. The parties agree to meet and confer on the subject of translating these documents into English. To further this meet and confer, attached to this letter please find an Excel spreadsheet that breaks down the foreign language documents by custodial group and language. **Status: Resolved.**

13. Item 12: AstraZeneca will shortly produce Item 12 CRF's in the same manner as it produced the IND-NDA. Plaintiffs will inform AstraZeneca of any perceived issues with this production after review. **Status: Resolved.**

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I am happy to make myself and my technical team available at any time to discuss resolving these issues before June 7, 2007. Specifically, I offer to travel to New York for a meet and confer session on Friday, June 1, 2007, or to have a conference call Monday, June 4, 2007, or to again travel to New York on June 5 or 6, 2007, to resolve whatever of these issues remain.

Finally, AstraZeneca understands that Plaintiffs will today provide their own summary of the issues raised in yesterday's meet and confer session, along with potential solutions to them.

Please contact me to confirm that Plaintiffs agree with this summary.

Very truly yours,

Andrew S. Dupre for J. J. Freebery.
James J. Freebery

mrh

Enclosure: Foreign Language Document Breakdown

SEROQUEL FOREIGN LANGUAGE DOCUMENTS

FIRST 8	263 Documents
AFRIKAANS	1
CHINESE	2
DUTCH	21
FINNISH	2
FRENCH	13
GERMAN	23
GREEK	3
ITALIAN	10
JAPANESE	8
KOREAN	2
NORWEGIAN	1
POLISH	2
PORTUGUESE	4
RUSSIAN	5
SPANISH	46
SWEDISH	69
TOTAL	212

SEROQUEL FOREIGN LANGUAGE DOCUMENTS

NEXT 9	274 Documents
DUTCH	21
FRENCH	36
GERMAN	44
GREEK	2
ITALIAN	21
JAPANESE	7
SPANISH	36
SWEDISH	91
TURKISH	2
TOTAL	260

SEROQUEL FOREIGN LANGUAGE DOCUMENTS

GROUP 1	114 Documents
CHINESE	1
DUTCH	4
GERMAN	7
ITALIAN	3
JAPANESE	3
PORTUGUESE	1
RUSSIAN	1
SPANISH	39
SWEDISH	37
TURKISH	1
TOTAL	97

SEROQUEL FOREIGN LANGUAGE DOCUMENTS

950 Documents

GROUP 2

CHINESE	4
DANISH	4
DUTCH	105
FLEMISH	2
FRENCH	47
GERMAN	110
GREEK	5
HUNGARIAN	2
ITALIAN	8
JAPANESE	74
KOREAN	3
NORWEGIAN	19
POLISH	1
SLOVENIAN	5
SPANISH	103
SWEDISH	327
TURKISH	2
VIETNAMESE	2

TOTAL

823

SEROQUEL FOREIGN LANGUAGE DOCUMENTS

839 Documents

GROUP 3

CHINESE	11
CZECH	1
DANISH	12
DUTCH	102
ESTONIAN	4
FLEMISH	1
FRENCH	103
GERMAN	79
GREEK	4
HUNGARIAN	2
ITALIAN	8
JAPANESE	74
KOREAN	3
LATVIAN	1
LITHUANIAN	1
NORWEGIAN	5
POLISH	1
RUSSIAN	1
SPANISH	52
SWEDISH	343
TURKISH	4
TOTAL	812

SEROQUEL FOREIGN LANGUAGE

SUMMARY: 2,440 Documents

AFRIKAANS	1	0.05%
CHINESE	18	0.82%
CZECH	1	0.05%
DANISH	16	0.73%
DUTCH	253	11.48%
ESTONIAN	4	0.18%
FINNISH	2	0.09%
FLEMISH	3	0.14%
FRENCH	199	9.03%
GERMAN	263	11.93%
GREEK	14	0.64%
HUNGARIAN	4	0.18%
ITALIAN	50	2.27%
JAPANESE	166	7.53%
KOREAN	8	0.36%
LATVIAN	1	0.05%
LITHUANIAN	1	0.05%
NORWEGIAN	25	1.13%
POLISH	4	0.18%
PORTUGUESE	5	0.23%
RUSSIAN	7	0.32%
SLOVENIAN	5	0.23%
SPANISH	276	12.52%
SWEDISH	867	39.34%
TURKISH	9	0.41%
VIETNAMESE	2	0.09%
TOTAL	2204	100.00%