# EXHIBIT "2"

# WEITZ

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July 26, 2007

# VIA E-mail and Regular Mail

Fred Magaziner, Esquire Marjorie Shiekman, Esquire Dechert, LLP Cira Center 2929 Arch Street Philadelphia, PA 19104-2808

Re: AstraZeneca's Objections To Plaintiffs' Designations And Proposed

Eligible Plaintiffs List MDL No. 1769

#### Dear Counsel:

Weitz & Luxenberg, P.C. objects to the exclusion of the following Plaintiffs from Defendants list of deposition eligible Plaintiffs. Enclosed for service upon you, please find specific information regarding the Plaintiffs identified below which clearly makes them eligible for deposition. This information is being provided in response to AstraZeneca's listed objections to the eligibility of these Plaintiffs for deposition.

#### Michelle Aden:

Objection: Person other than plaintiff signed; not brought as representative action.

Response: This is the first deficiency notice Plaintiff's counsel has received for Michelle Aden since we served her Plaintiff Fact Sheet and Defense Authorization on 06/21/2007. Enclosed are Guardianship papers for Howard Aden, Michelle Aden's father who will represent her in this litigation.

#### **Lindi Brown:**

**Objection:** Prescriber Information Not Provided.

Response: This is the first deficiency notice Plaintiff's counsel has received for Lindi Brown since we served her Plaintiff Fact Sheet and Defense Authorization. This was

previously provided in our initial submission on 06/21/2007. Enclosed please find another copy of the Plaintiff Fact Sheet with the Prescriber Information Provided in Section IV under Seroquel.

# Debra Carroll:

**Objection:** Missing Defense Authorization

Response: Debra Carroll's Plaintiff Fact Sheet and Authorizations were served on 01/31/2007. Plaintiff's counsel received a deficiency notice on 03/08/2007 and a deficiency response for Debra Carroll was served to the Defendants on 03/15/2007 which included a Defense Authorization. Enclosed please find another copy of the Defense Authorization for Debra Carroll. This is the third time we have provided Defendants with this Authorization.

#### Bettie Edwards:

Objection: Missing Authorization and Prescriber Information

Response: Bettie Edwards Plaintiff Fact Sheet and Defense Authorizations were served on 01/31/2007. Plaintiff's counsel received a deficiency notice on 03/28/2007 and a deficiency response for Bettie Edwards was served to the Defendants on 04/05/2007. Enclosed please find another copy of the Defense Authorizations for Bettie Edwards. Prescriber Information is provided in Section IV in the Plaintiff Fact Sheet. Plaintiff cannot recall the complete name of the physicians with whom she consulted at Raleigh Correctional Center for Women. This is the third time we have provided Defendants with the Authorization and Prescriber Information.

#### Gene Fesmire:

Objection: Prescriber Information Not Provided.

Response: This is the first deficiency notice Plaintiff's counsel has received for Gene Fesmire since we served his Plaintiff Fact Sheet and Defense Authorization. This was previously provided in our initial submission on 06/21/2007. Prescriber Information is provided in Section IV in the Plaintiff Fact Sheet. Plaintiff still cannot recall the complete name of the physicians with whom he consulted at Quinco-Chester County Counseling Center.

#### Marilyn Gore:

**Objection:** Missing Authorization

Response: This is the first deficiency notice Plaintiff's counsel has received for Marilyn Gore since we served her Plaintiff Fact Sheet and Defense Authorization on 01/31/2007. This was previously provided in our initial submission on 01/31/2007. Enclosed are Defense Authorizations for Marilyn Gore. This is the second time we have provided Defendants with this Authorization.

# **Evelyn Hughes:**

**Objection:** Missing Authorization

Response: Evelyn Hughes Plaintiff Fact Sheet and Defense Authorizations were served on 01/31/2007. Plaintiff's counsel received a deficiency notice on 04/04/2007 and a deficiency response for Evelyn Hughes was served upon Defendants on 04/09/2007. Enclosed please find another copy of Defense Authorizations for Evelyn Hughes. This is the third time we have provided Defendants with this Authorization.

# George Jefferson Jr.:

**Objection:** Missing Authorization

Response: George Jefferson's Plaintiff Fact Sheet and Authorizations were served on 01/31/2007. Plaintiff's counsel received a deficiency notice on 03/07/2007 and a deficiency response for George Jefferson was served upon Defendants on 03/15/2007. Enclosed please find another copy of the Defense Authorization for George Jefferson. This is the third time we have provided Defendants with this Authorization.

# Alex Jones:

**Objection:** Missing Authorization

Response: Alex Jones Plaintiff Fact Sheet and Authorizations were served on 01/31/2007. Plaintiff's counsel received a deficiency notice on 03/01/2007 and a deficiency response for Bettie Edwards was served upon Defendants on 03/13/2007. Enclosed please find another copy of the Defense Authorization for Alex Jones. This is the third time we have provided Defendants with this Authorization.

#### Joan Ladd:

Objection: Missing Authorization and Prescriber Information.

Response: This is the first deficiency notice Plaintiff's counsel has received for Joan Ladd since we served her Plaintiff Fact Sheet and Defense Authorization on 04/09/2007. This was previously provided in our initial submission on 04/09/2007. Enclosed please find another copy of the Defense Authorizations for Joan Ladd. Prescriber Information is provided in Section IV of the Plaintiff Fact Sheet we have enclosed. This is the second time we have provided Defendants with this Authorization and Prescriber Information.

# Ronald LeProwse:

Objection: Prescriber Information Not Provided.

Response: This is the first deficiency notice Plaintiff's counsel has received for Ronald LeProwse since we served his Plaintiff Fact Sheet and Defense Authorization on 01/31/2007. This was previously provided in our initial submission on 01/31/2007. Prescriber Information is provided in Section IV of the Plaintiff Fact Sheet we have enclosed. This is the second time we have provided Defendants with this information.

#### Suzanne Melanson:

Objection: Person other than Plaintiff signed; Not brought as a Representation Action and Prescriber Information Not Provided.

Response: This is the first deficiency notice Plaintiff's counsel has received for Suzanne Melanson since we served her Plaintiff Fact Sheet and Defense Authorization on 06/22/2007. Confirmed with Suzanne Melanson that the signature on both the Plaintiff Fact Sheet and Defense Authorization were signed by the Plaintiff herself. Prescriber Information provided in Section IV of the Plaintiff Fact Sheet is enclosed. This is the second time we have provided Defendants with this information.

#### Jason Modesty:

Objection: Prescriber Information Not Provided

Response: This is the first deficiency notice Plaintiff's counsel has received for Jason Modesty since we served his Plaintiff Fact Sheet and Defense Authorization on 06/22/2007. Jason Modesty recalls several physicians with whom he consulted at Angela Center Behavioral Health Services. They are Dr. Naeem Qureshi, Dr. Michael Darmadi, and Dr. John Lauer. Enclosed is an updated Plaintiff Fact Sheet with the Prescriber Information provided in Section IV.

#### Daniel Poole:

Objection: Prescriber Information Not Provided

Response: This is the first deficiency notice Plaintiff's counsel has received for Daniel Poole since we served his Plaintiff Fact Sheet and Defense Authorization on 06/21/2007. Prescriber Information is provided in Section IV in the Plaintiff Fact Sheet. However, Plaintiff cannot recall the complete name of the physicians with whom he consulted at Darnall Army Hospital in Fort Hood.

#### Michael Pullim:

**Objection:** Prescriber Information Not Provided and Missing Authorization

Response: This is the first deficiency notice Plaintiff's counsel has received for Michael Pullim since we served his Plaintiff Fact Sheet and Defense Authorization on 01/31/2007. This was previously provided in our initial submission on 01/31/2007. Enclosed please find another copy of the Defense Authorization and Prescriber Information is provided in Section IV in the Plaintiff Fact Sheet. This is the third time we have provided Defendants with the Authorization and Prescriber Information.

### Evelyn Rodriguez:

Objection: Prescriber Information Not Provided.

Response: This is the first deficiency notice Plaintiff's counsel has received for Evelyn Rodriguez since we served her Plaintiff Fact Sheet and Defense Authorization on 06/22/2007. Prescriber Information is provided in Section IV in the Plaintiff Fact Sheet.

Plaintiff cannot recall the complete name of the physicians with whom she consulted at St, Mary's Hospital for Behavior Health Care Services.

# William Shirnberg:

**Objection:** Prescriber Information Not Provided

Response: This is the first deficiency notice Plaintiff's counsel has received for William Shirnberg since we served his Plaintiff Fact Sheet and Defense Authorization on 06/22/2007. Prescriber Information is provided in Section IV in the Plaintiff Fact Sheet. Plaintiff cannot recall the complete name of the physicians with whom he consulted at Central Penisula Counseling Services.

# Eva Gentry:

Plaintiff was not mentioned in either your objection or eligible list. We served her Plaintiff Fact Sheet and Defense Authorization on 06/22/2007 and then supplemented the submission with additional information on 07/06/2007.

# **Cody Tokheim:**

Plaintiff was not mentioned in either your objection or eligible list. We served his Plaintiff Fact Sheet and Defense Authorization on 04/04/2007.

### Matthew Moore:

Plaintiff was named in the objection list, but no reason for Defendants' objection was provided. We served his Plaintiff Fact Sheet and Defense Authorization on 06/21/2007.

In light of the above responses, my clients would request that you withdraw your objections, and restore them to the list of deposition eligible plaintiffs. If you have any additional objections, please advise my office immediately.

cc: Marjorie Shiekman, Esq (enclosed CD)