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Sent: Wednesday, August 15, 2007 2:40 PM
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Subject: Meet/Confer Search Terms - Confirmation

Hello All:

This email is meant to serve Plaintiffs' request for written confirmation of certain items related to the new search term project that were discussed by phone today. While a great many issues were discussed, I intend this email only to address those items for which Plaintiffs or AstraZeneca requested written confirmation.

1. The documents residing at AstraZeneca's processing vendor that were not hit by the original search term list are not indexed. This was not part of the scope of work given to the vendor in the first instance - only documents deemed potentially relevant were sent to the end use vendor for indexing, production processing and coding. Therefore, searching for the new term list on which we are presently working to agree requires the vendor to search through text strings of the underlying documents, not an index. This explains why AstraZeneca has always given an estimate time for doing new searches as days or weeks rather than minutes.

2. The vendor is writing up a paragraph explanation of the deduplication process. I will forward it on when I receive it.

3. Plaintiffs have agreed to take the first crack at writing search terms that they actually want. For example, Plaintiffs will be responsible in the first instance for offering a term such as "diabet*", rather than "diabetic", if they want the search to reveal "diabetes". Similarly, Plaintiffs will identify which of their quote terms are really meant to be proximity searches and not verbatim term searches. This change largely eliminates the utility of my original proposal, because that proposal relied on lists of terms previously identified by Plaintiffs that do not necessarily represent what Plaintiffs really want. In other words, I anticipate having to rewrite the queries.

4. AstraZeneca has agreed to run all the acronyms as case insensitive. Plaintiffs have agreed to accept the large amount of false positives that this will surely hit, especially for words like "best".

5. AstraZeneca has agreed to get a proposed query for the remaining terms, which are those more complex search terms containing linkage devices, by Friday, August 17, 2007.

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