

**Dennis Canty**

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**From:** Dupre, Andrew [ADupre@McCarter.com]  
**Sent:** Monday, August 27, 2007 1:53 PM  
**To:** Dennis Canty  
**Cc:** McConnell, Stephen; Winchester, Tony; Freebery, James J.; cbailey@bpblaw.com; ftrammell@bpblaw.com; JDriscoll@brownandcrouppen.com; kbailey@bpblaw.com; KSmith@AWS-LAW.com; LROTH@roth-law.com; Larry J. Gornick; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gsnlaw.com; Schultz, Laurie; Fernandez, Lenny; Jaffe, Jonathan  
**Subject:** RE: Search terms Text File

I received the first draft of the report today (it is actually two reports, one for produced and one for unproduced documents). My first pass suggests it looks good, but obviously I need to conduct quality assurance. The estimated timeline on this was 7-10 days. Right now it does not look like we will have any trouble meeting that. Hope you all are well-

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-----Original Message-----

**From:** Dennis Canty [mailto:dcanty@laskg-law.com]  
**Sent:** Monday, August 27, 2007 4:41 PM  
**To:** Dupre, Andrew  
**Cc:** McConnell, Stephen; Winchester, Tony; Freebery, James J.; cbailey@bpblaw.com; ftrammell@bpblaw.com; JDriscoll@brownandcrouppen.com; kbailey@bpblaw.com; KSmith@AWS-LAW.com; LROTH@roth-law.com; Larry J. Gornick; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gsnlaw.com; Schultz, Laurie; Fernandez, Lenny; Jaffe, Jonathan  
**Subject:** RE: Search terms Text File

Andrew -

It has been a week. AstraZeneca has not provided the promised report, nor any indication of status. Please advise.

Dennis J. Canty  
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**From:** Dupre, Andrew [mailto:ADupre@McCarter.com]  
**Sent:** Monday, August 20, 2007 7:26 AM  
**To:** Dennis Canty; Jaffe, Jonathan  
**Cc:** McConnell, Stephen; Winchester, Tony; Freebery, James J.; cbailey@bpblaw.com; ftrammell@bpblaw.com; JDriscoll@brownandcrouppen.com; kbailey@bpblaw.com; KSmith@AWS-LAW.com; LROTH@roth-law.com; Larry J. Gornick; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gsnlaw.com; Schultz, Laurie; Fernandez, Lenny  
**Subject:** RE: Search terms Text File

Hello all:

I can answer the first question immediately. For page counts etc. I will have to go the vendor.

Quetiapine was searched as a single word, without stemming, case insensitive. Thus, in the search, it appears as quetiapine no quotes, asterixes, etc.

DM was searched in several variations in an attempt to capture all of its possible abbreviations. If my memory serves, I believe Mr. Gornick may have suggested a few of these variations in the call we had approximately July 20. All of these searches were case insensitive, no stemming.

dm  
d.m.  
dm.

Note that the elimination of punctuation in the search made the third search redundant to the first. No harm was done in searching for both, however; it was simply extra work for us.

Please note that these searches predated our agreement regarding running reports to indicated document counts. It is AstraZeneca's intention to simply produce all possibly relevant non-privileged documents that contain these terms, rather than list them on some report. In our other reports, these documents will appear as "produced" (using the revised meaning of the term that has been discussed *ad nauseum* by phone). These documents are either very close or already in the process of being produced. I will get more information on that point for Plaintiffs today.

On a final note, I took dm and quetiapine off the final search term list because they had already been done. I see that Jonathan has added them on again in the list circulated Friday. That is fine with me if Plaintiffs really want them on there, but I respectfully suggest searching those terms again is a waste of time.

My best-

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-----Original Message-----

**From:** Dennis Canty [mailto:dcanty@laskg-law.com]

**Sent:** Friday, August 17, 2007 6:18 PM

**To:** Jaffe, Jonathan; Dupre, Andrew

**Cc:** McConnell, Stephen; Winchester, Tony; Freebery, James J.; cbailey@bpblaw.com; ftrammell@bpblaw.com; JDriscoll@brownandcrouppen.com; kbailey@bpblaw.com; KSmith@AWS-LAW.com; LROTH@roth-law.com; Larry J. Gornick; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gsnlaw.com; Schultz, Laurie; Fernandez, Lenny

**Subject:** RE: Search terms Text File

AstraZeneca has represented that the review and production process has begun for documents found using the "DM" and "quetiapine" terms. Plaintiffs request that AstraZeneca provide: a) the syntax used for that search; b) the number of documents and pages yielded by that search; b) an indication of when the review and production process will be complete; and d) and indication of how the documents found in that search will be represented on the agreed report (i.e., will they come up as produced, not produced, under review, how?).

Thanks.

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**From:** Jaffe, Jonathan [mailto:jjaffe@weitzlux.com]

**Sent:** Friday, August 17, 2007 2:52 PM

**To:** Dupre, Andrew; Dennis Canty

**Cc:** McConnell, Stephen; Winchester, Tony; Freebery, James J.; cbailey@bpblaw.com; Dennis Canty; ftrammell@bpblaw.com; JDriscoll@brownandcrouppen.com; kbailey@bpblaw.com; KSmith@AWS-LAW.com; LROTH@roth-law.com; Larry J. Gornick; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gsnlaw.com; Schultz, Laurie; Fernandez, Lenny  
**Subject:** RE: Search terms Text File

Andrew,

Here is the revised search term list. Please note that we have put the word REMOVED before all of the terms we replaced, and the word FIXED in front of the replacement terms. There were a few terms that were on our original list that were not present that we put with the word FIXED before. Please do not run with the words FIXED and REMOVED, these are intended just to make it easier for you to see our changes.

If you have questions, please do not hesitate to contact me.

Have a good weekend,  
Jonathan

FIXED DM  
FIXED Quet\*  
FIXED Quetiapine  
QUEST  
CAFE  
CLEARs  
COPE  
PRIZE  
REASSURE  
SPIN  
STACK  
STAGE  
REMOVED STORM  
REMOVED STORMS  
FIXED STORM\*  
SURPASS  
SURPRISE  
BEST  
^BEST  
DOC  
^DOC  
CDSS  
EPS  
NMS  
SBT  
SQL  
SLT  
WG  
BOLDER  
CATIE  
QBAN  
FIXED Q BAN  
QUARTZ

SPARCLE  
FIXED SPARKLE  
REMOVED PRINCESS  
FIXED PRINCES\*  
DKA  
FBGC  
HG  
SQ  
FDA  
IR  
S  
REMOVED Diabetic\*  
FIXED Diabet\*  
FIXED Diabetic  
Hypoglyc\*  
Manic\*  
REMOVED Metabolic\*  
FIXED Metabol\*  
REMOVED Neuroleptic\*  
Neurolept\*  
Parkinson\*  
REMOVED Pre-diabetic\*  
FIXED Prediab\*  
REMOVED Schizophrenic\*  
FIXED Schizophren\*  
FIXED Schizo\*  
Serq\*  
REMOVED Serequel\*  
Serequel  
REMOVED Sroquel\*  
Sroquel  
REMOVED Suroquel\*  
Suroquel  
REMOVED Snorequel\*  
Snorequel  
REMOVED Serowuel\*  
Serowuel  
REMOVED Serpquel\*  
Serpquel  
REMOVED Serouquel\*  
Serouquel  
REMOVED Ceroquel\*  
Ceroquel  
FIXED Seroguel  
REMOVED Anxiety\*  
FIXED Anxiety  
Atypical\*  
FIXED a typical\*  
REMOVED Dementia\*  
FIXED Dement\*  
REMOVED Depression\*  
FIXED Depress\*

Depression  
 REMOVED Insomnia\*  
 FIXED Insomn\*  
 REMOVED Ketoacidosis\*  
 FIXED Ketoacidosis  
 REMOVED Obesity\*  
 FIXED Obes\*  
 REMOVED Endocrinologist\*  
 REMOVED Endocrinology\*  
 FIXED Endocr\*  
 REMOVED Lipids\*  
 FIXED Lipid\*  
 REMOVED QT Interval  
 FIXED QT Int\*  
 REMOVED Weight Change  
 FIXED Weight .NEAR5. Change  
 REMOVED Weight Loss  
 FIXED Weight .NEAR5. Loss\*  
 REMOVED Weight Neutral  
 FIXED Weight .NEAR5. Neutral  
 REMOVED Weight Normalizing  
 FIXED Weight .NEAR5. Normaliz\*  
 REMOVED Bipolar Execution Strategy Team  
 FIXED Bipolar .NEAR5. Exec\* .NEAR5. Strat\*  
 REMOVED Calgary Depression Scale for Schizophrenia  
 FIXED Depress\* .NEAR5. Scale .NEAR5. Schizo\*  
 REMOVED Insulin Dependent Diabetes Mellitus  
 FIXED IDDM .OR. (Insulin .NEAR5. Depend\* .NEAR5. Mel\*)  
 REMOVED Insulin Resistance  
 FIXED Insulin .NEAR5. Resist\*  
 Partial Responders International Schizophrenia  
 Quetiapine Experience with Safety  
 Seroquel Brand Team  
 FIXED Brand .NEAR5. Team  
 Seroquel Leadership Team  
 FIXED Leaders\* .NEAR5. Team  
 Seroquel Publications Information News  
 FIXED Pub\* .NEAR5. Info\* .NEAR5. New\*  
 Seroquel Takes Olanzapine Risperdal Market Share  
 FIXED Olanz\* .NEAR5. Risp\* .NEAR5. Mark\*  
 REMOVED Mood Disorder  
 FIXED Mood Disord\*  
 REMOVED Second Generation  
 FIXED (2nd .OR. Second) Gen\*  
 REMOVED Black Box  
 FIXED Black Box .OR. BlackBox\*  
 REMOVED Case Study  
 FIXED Case Stud\*  
 REMOVED Consensus Statement  
 FIXED Consen\* .NEAR5. Stateme\*  
 REMOVED Elevated Cholesterol Level  
 FIXED Elevat\* .NEAR5. Cholest\* .NEAR5. (Level or Lvl)

REMOVED Elevated Triglyceride Level  
 FIXED Elevat\* .NEAR5. (Trigly\* or Trigli\*) .NEAR5. (Level or Lvl)  
 REMOVED Off Label  
 FIXED Off Label .OR. OffLabel  
 State Government Affairs  
 FIXED (State or St) .NEAR5. (Government .OR. Gvt) .NEAR5. Affair\*  
 Anti psychotic .OR. Antipsychotic  
 ASEC .OR. antipsychotic side effect checklist .OR. anti psychotic side effect checklist  
 BPRS .OR. brief psychiatric rating scale  
 REMOVED Direct to consumer .OR. DTC  
 FIXED (Direct .NEAR5. Consumer) .OR. DTC  
 REMOVED GAD .OR. generalized anxiety disorder .OR. general anxiety disorder  
 FIXED GAD .OR. gen\* anxiety disorder\*  
 REMOVED IDDM .OR. non insulin dependant diabetes mellitus  
 FIXED NIDDM .OR. ((non insulin .OR. noninsulin) .NEAR5. depend\* dia\* mel\*)  
 REMOVED MADRS .OR. Montgomery Asberg  
 FIXED MADRS .OR. (Montg\* .NEAR5. Asber\*)  
 REMOVED SGA .OR. second generation antipsychotic .OR. second generation anti psychotic  
 FIXED SGA  
 YMRS .OR. young mania rating scale  
 FGT .OR. fasting glucose test  
 REMOVED Loss of balance .OR. loss of coordination  
 FIXED (loss .NEAR5. balance) .OR. (loss .NEAR5. coord\*)  
 REMOVED MDD .OR. Major depressive disorder  
 FIXED MDD .OR. (Maj\* .NEAR5. depress\* .NEAR5. disord\*)  
 REMOVED MDQ .OR. mood disorder questionnaire  
 FIXED MDQ .OR. (mood .NEAR5. disorder\* .NEAR5. quest\*)  
 REMOVED Neutropenia .OR. leukopenia  
 FIXED Neutropen\* .OR. leukopen\*  
 REMOVED OCD .OR. obsessive compulsive disorder  
 FIXED OCD .OR. (obsess\* .NEAR5. comp\* .NEAR5. disorder\*)  
 REMOVED PANSS .OR. positive negative syndrome scale  
 FIXED PANSS .OR. (pos\* .NEAR5. neg\* .NEAR5. syndrome\*)  
 REMOVED PTSD .OR. post traumatic stress disorder  
 FIXED PTSD .OR. ((post traum\* .OR. posttraum\*) .NEAR5. stress .NEAR5. disorder\*)  
 REMOVED QDS .OR. quantitative decision science  
 FIXED QDS .OR. (quant\* .NEAR5. deci\* .NEAR5. science)  
 REMOVED Sleep .AND. (aid .OR. pill)  
 FIXED sleep .AND. (aid\* .OR. pill\*)  
 REMOVED TIMA .OR. Texas Implementation of Medication  
 FIXED TIMA .OR. (Texas .OR. TX) .NEAR5. Impl\* .NEAR5. Med\*  
 BMI .OR. body mass index  
 CNS .OR. central nervous system  
 REMOVED CVA .OR. core visual aid  
 FIXED CVA .OR. core visual aid\*  
 REMOVED Dear Healthcare provider .OR. HCP .OR. Dear Doctor Letter .OR. DDL  
 FIXED (Dear .NEAR5. Health\* .NEAR5. Provider\*) .OR. (Dear .NEAR5. Doctor .Letter) .OR. DDL  
 REMOVED DOC .OR. department of corrections  
 FIXED DOC .OR. Dep\* .NEAR5. Correction\*  
 REMOVED KOL .OR. key opinion leader  
 KOL .OR. key opinion leader\*  
 LTC .OR. long term care

REMOVED MHLW .OR. ministry of health labour welfare  
FIXED MHLW .OR. (ministry .NEAR5. health .NEAR5. welfare)  
REMOVED OLE .OR. open label extension  
FIXED OLE .OR. open label extension\*  
REMOVED SERM .OR. safety evaluation review meeting  
FIXED SERM .OR. safety .NEAR5. eval\* .NEAR5. review .NEAR5. (meet\* .OR. mtg\*)  
REMOVED SWOT .OR. strength weakness opportunity threat  
FIXED SWOT .OR. (strength .NEAR5. weak\* .NEAR5. opp\* .NEAR5. threat\*)  
FIXED Study .NEAR5. [NUMBERS TO BE INSERTED BY AZ]  
FIXED Trial .NEAR5. [NUMBERS TO BE INSERTED BY AZ]  
FIXED DMH .OR. (Dep\* .NEAR5. Mental .NEAR5. Health)

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**From:** Dupre, Andrew [mailto:ADupre@McCarter.com]

**Sent:** Friday, August 17, 2007 4:22 PM

**To:** Jaffe, Jonathan; Canty, Dennis

**Cc:** McConnell, Stephen; Winchester, Tony; Freebery, James J.; cbailey@bpblaw.com; Canty, Dennis; ftrammell@bpblaw.com; JDriscoll@brownandcrouppen.com; kbailey@bpblaw.com; KSmith@AWS-LAW.com; LROTH@roth-law.com; Igornick@lskg-law.com; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gsnlaw.com; Schultz, Laurie; Fernandez, Lenny

**Subject:** RE: Search terms Text File

Refreshingly shorter response today:

1. ^
2. Yes - punctuation eliminated for search purposes (discussed on phone Tuesday in context of hyphens).
3. Here is an example of a 5 word proximity search - generalized.NEAR5.anxiety.NEAR5.disorder.
4. No.
5. Yes.
6. Segregating out the non-stemmed terms eliminates the need for space term space. Searching for EPS instead of \*EPS\* will only return EPS and not Dr. Epstein. We therefore no longer need the more complicated space term space model.
7. Yes - same as 2. they count as spaces. this means you'll have to do two searches for your terms like antipsychotic and anti-psychotic.

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-----Original Message-----

**From:** Jaffe, Jonathan [mailto:jjaffe@weitzlux.com]

**Sent:** Friday, August 17, 2007 12:49 PM

**To:** Dupre, Andrew; Canty, Dennis

**Cc:** McConnell, Stephen; Winchester, Tony; Freebery, James J.; cbailey@bpblaw.com; Canty, Dennis; ftrammell@bpblaw.com; JDriscoll@brownandcrouppen.com; kbailey@bpblaw.com; KSmith@AWS-LAW.com; LROTH@roth-law.com; Igornick@lskg-law.com; MPerrin@bpblaw.com; Pederson, Mike; Pennock, Paul; pschneider@gsnlaw.com; Schultz, Laurie; Fernandez, Lenny

**Subject:** RE: Search terms Text File

Andrew,

Some questions to help us mark this up appropriately:

- 1) What's the syntax to specify case sensitive? Is it a ^ before the term? I want to make sure that's not specified for all the terms (I see some are in all CAPS on the list you sent), and we may throw in ^best as well just to shorten the back and forth expected on that.
- 2) If a word comes at the beginning of a paragraph or at the end of a sentence or followed by a comma, semicolon or quotation mark, are all those marks ignored?
- 3) How do we specify proximity or that we do not want to match only on a specific word order?
- 4) Is there a .NOT.?
- 5) If we specify 'OR' instead of '.OR.' does that mean it would look for the literal term?
- 6) Earlier you had mentioned space word space as necessary to search the whole word. Some on this list have one space after them, like DOC, others have multiple, like the 4 spaces after weight loss, and most have no space before or after. Is this required? This question goes hand in hand with #2.
- 7) Can you confirm again that hyphens are ignored?

Thanks,  
Jonathan Jaffe

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**From:** Dupre, Andrew [mailto:ADupre@McCarter.com]  
**Sent:** Friday, August 17, 2007 12:19 PM  
**To:** Jaffe, Jonathan; Canty, Dennis  
**Cc:** McConnell, Stephen; Winchester, Tony; Freebery, James J.  
**Subject:** Search terms Text File

Hello Jonathan:

As promised , attached is the executable text file that could provide a query for the new search terms. Some caveats:

1. This is based on the list that Plaintiffs gave us. To the extent Plaintiffs wish to change that list, you will have to edit this file. For example, we discussed that Plaintiffs actually want to stem on roots and to use proximity searches. We have agreed that it will be Plaintiffs' responsibility to tell us what they really want.
2. I expect this file will have to be heavily adjusted once Plaintiffs make those decisions. We are willing to work with you to do so.
3. We are looking at approximately a week long process to do the search. Delays on finalizing this file will mean delays on having the agreed report in Plaintiffs' hands.

Hope you are well-

<<Search\_3\_ver\_3.txt>>

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