

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

**IN RE: Seroquel Products Liability Litigation
MDL DOCKET NO. 1769**

This Document Relates to All Cases in Exhibit “A” to Document No. 328

**ASTRAZENECA’S NOTICE OF ERRATA REGARDING ITS
CHOICE-OF-LAW BRIEF AND RELATED EXHIBIT A**

AstraZeneca Pharmaceuticals LP and AstraZeneca LP (“AstraZeneca”) respectfully submits this notice of errata concerning the choice-of-law legal brief and Exhibit A thereto, filed on September 12, 2007 in response to the Court’s Order dated August 28, 2007. Attached hereto are corrected versions of that choice-of-law brief and accompanying Exhibit A.¹

After the brief and accompanying exhibit were filed with the Court, AstraZeneca discovered several coding errors. Most notably, AstraZeneca found that one consolidated complaint filed by several plaintiffs subject to the instant motion (initially styled as *Campbell v. AstraZeneca*) was inadvertently listed as among the many complaints originally filed in the U.S. District Court for the District of Massachusetts when it was in fact filed in the U.S. District Court for the Eastern District of Missouri. Thus, there are 16, not 15, relevant transferor courts implicated by the pending motion. That is the principal reason for this notice of errata. Thus, the corrected version of AstraZeneca’s choice-of-law brief includes a short discussion of

¹ Specifically, attached hereto as Exhibit 1 is a red-lined version of AstraZeneca’s choice-of-law brief, reflecting the changes to the brief previously filed on September 12, 2007; attached as Exhibit 2 is a clean version of AstraZeneca’s corrected choice-of-law brief; and attached as Exhibit 3 is AstraZeneca’s corrected Exhibit A to its choice-of-law brief.

Missouri's choice-of-law rules so that AstraZeneca has addressed each implicated choice-of-law regime as requested by the Court's Order.

In addition, AstraZeneca submits the attached corrected Exhibit A to its choice-of-law brief, which AstraZeneca prepared to reflect this change as well as several other corrections to certain entries in the version of that exhibit filed on September 12, 2007. Those further changes include (where appropriate) corrected listing of the implicated plaintiff's name, docket number, identified transferor court, or pleaded state of residency. Where any correction as to a given plaintiff's pleaded state of residency indicated that the plaintiff allegedly resides in a jurisdiction whose substantive law is *not* covered by AstraZeneca's pending motion, then AstraZeneca has deleted such a plaintiff from the attached corrected Exhibit A. As a result of these corrections, the total number of plaintiffs subject to the pending motion has been reduced to 3,647 from the 3,679 identified in AstraZeneca's prior briefing.

Moreover, for the Court's convenience, the attached version of Exhibit A also adds two additional columns to facilitate analysis of the pending motion: Column E, entitled "Status"; and Column F, entitled "Challenged Claims." Column E is added to reflect whether each subject plaintiff's case has been dismissed by the Court – either dismissed with prejudice ("DwP"), or dismissed without prejudice ("Dw/oP") – given that the instant motion is likely rendered moot as to those plaintiffs by virtue of such dismissals. Column F is added to reflect whether the pending motion attacks the identified plaintiff's assertion of a strict liability design-defect claim ("DD") alone or also an implied-warranty claim ("IW").

As soon as these technical issues were discovered, AstraZeneca notified plaintiffs' counsel of them, and of AstraZeneca's intent to submit a corrected Exhibit A promptly upon

completion of its further review. In fact, the parties have worked amicably in identifying certain inaccuracies in the previously filed Exhibit A, in order to provide the Court with the most accurate record with respect to the pending motion. At their request, AstraZeneca provided plaintiffs' counsel with a searchable and edit-able electronic version of its original Exhibit A, and also, as soon as it was prepared, a searchable and edit-able electronic version of the corrected Exhibit A.

DATED: September 24, 2007

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on September 24, 2007, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system through which all participating parties are deemed served. I further certify that, by using the CM/ECF, the foregoing has been served on plaintiffs' liaison counsel, who is charged with serving any non-CM/ECF participants on the attached Service List.

/s/ Gretchen S. Sween

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MDL Docket No. 1769**

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