

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In Re: Seroquel Products Liability Litigation
MDL Docket No. 1769

DOCUMENT RELATES TO ALL CASES

Case No. 6:06-md-01769-ACC-DAB

**DECLARATION OF DENNIS J. CANTY
PLAINTIFFS' MOTION FOR SANCTIONS
DUE TO MISCONDUCT IN CASE-SPECIFIC
DISCOVERY**

I, Dennis J. Canty, hereby declare as follows:

1. I am an attorney with the firm Levin Simes Kaiser & Gornick LLP, attorneys of record for plaintiffs in the above-referenced action. I have personal knowledge of the facts set forth herein, and would testify competently to the same if called upon to do so.
2. Attached hereto as Exhibit 1 is a copy of an Excel spreadsheet prepared at my direction, summarizing for select cases the dates disclosures were received from AstraZeneca, various characteristics of those disclosures, and dates of plaintiff, prescribing physician and treating physician depositions.
3. Attached hereto as Exhibits 2 and 20 are true and correct copies of excerpts of deposition transcripts taken in the captioned action.
4. Attached hereto as Exhibits 3, 11 and 25 are true and correct copies of hearing transcripts in the captioned action.
5. Attached hereto as Exhibits 4 and 5 are true and correct copies of Orders filed in the captioned action.
6. Attached hereto as Exhibits 6-10, 12-13, 15, 19, 21-22, 27 are excerpts of disclosures received by this office on the dates indicated therein.

7. Attached hereto as Exhibits 14, 16-17, 19, 23-24, 26, 28-31 are true and correct copies of correspondence sent or received by this office or by Laminack, Pirtle & Martines, LLP on the dates indicated therein.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 24th day of October 2007 in San Francisco, CA.

/s/ Dennis J. Canty
Dennis J. Canty