

# EXHIBIT 16

# LPM

LAMINACK,  
PIRTLE &  
MARTINES,  
L.L.P.

RICHARD N. LAMINACK

THOMAS W. PIRTLE

BUFFY K. MARTINES

September 25, 2007

**Sent Via E-Mail**

**Sent Via Facsimile 303-607-3600**

Russell O. Stewart  
Faegre & Benson  
3200 Wells Fargo Center  
1700 Lincoln Street  
Denver, Colorado 80203-4532

Re: MDL No. 1769; Docket No. 6:07-10304; *Joanne Hinton v. AstraZeneca Pharmaceuticals, L.P., et al.*; In the United States District Court for the Middle District of Florida, Orlando Division

Dear Russell:

On September 5, 2007 I alerted you to an inconsistency in AstraZeneca's Disclosure of Available Case Specific Discovery Information and Documentation Pursuant to Case Management Order No. 4. I have attached my September 5<sup>th</sup> correspondence for your review.

You responded to my letter by saying you would look into the matter and, "if we discover that all available accounts payable information has not been provided, we will supplement our disclosures." You went on to say that if you discovered a problem that may have affected disclosures in other cases, you would supplement those disclosures as well.

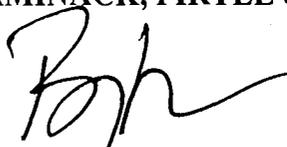
On September 11, 2007 you forwarded to me AstraZeneca's supplemental disclosure in the *Hinton* case, which disclosed accounts payable information not previously provided. This disclosure was sent by itself, with no explanation as to why the original disclosure was not accurate.

In light of your initial comments suggesting that the problem seen in the *Hinton* disclosure could have occurred in other cases, I would ask that you explain the exact nature of the problem and provide me reasonable assurances that the problem experienced in *Hinton* has not and will not happen in any other cases.

Thank you for your assistance in this matter.

Sincerely,

**LAMINACK, PIRTLE & MARTINES**

A handwritten signature in black ink, appearing to read 'Buffy K. Martines', written in a cursive style.

Buffy K. Martines

cc: Special Master Orran Brown

# LPM

LAMINACK,  
PIRTLE &  
MARTINES,  
L.L.P.

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Re: MDL No. 1769; Docket No. 6:07-cv-10304; *Joanne Hinton v. AstraZeneca Pharmaceuticals, L.P., et al.*; In the United States District Court for the Middle District of Florida, Orlando Division

Dear Russell:

On August 6, 2007 AstraZeneca produced its Disclosure of Available Case Specific Discovery Information and Documentation Pursuant to Case Management Order No. 4 for Plaintiff Joanne Hinton.

In Section II of its disclosure, AstraZeneca states, "AstraZeneca has searched its accounts payable database for Plaintiff's prescribing physician . . . . **AstraZeneca found no information regarding payments made to "Jane Macdonnell."**

In Exhibit "A" of its disclosure, AstraZeneca has produced call notes which clearly indicate that AstraZeneca has made payments to this physician, specifically:

1. page 2, line 23 states, "**Finally got check for Drs program from 2000, She was happy to get it and thanked me.**"
2. page 3, line 29 states, "**Hand delivered honorarium for case study program in April . . . "**

I have attached both the Disclosure and Exhibit "A" for your review.

We are very concerned about how thoroughly AstraZeneca has reviewed its accounts payable database, in light of the conflicting information provided in this case. I would ask that you have the accounts payable database reviewed a second time and supplement your disclosures immediately.

If you have any questions, please do not hesitate to contact me at 713-292-2750 or via e-mail at buffym@lpm-triallaw.com.

Thank you for your cooperation in this matter.

Sincerely,

**LAMINACK, PIRTLE & MARTINES**

A handwritten signature in black ink, appearing to read 'Buffy K. Martines', written in a cursive style.

Buffy K. Martines

enclosures

cc: F. Kenneth Bailey/K.Camp Bailey via e-mail

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

IN RE: Seroquel Products Liability Litigation

MDL DOCKET NO. 1769

This Document Relates to:

Joanne Hinton v. AstraZeneca Pharmaceuticals  
LP, et al.

CASE NUMBER: 6:07-cv-10304

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**AstraZeneca's Disclosure of Available Case Specific Discovery  
Information and Documentation Pursuant to Case Management Order No. 4 for  
PLAINTIFF JOANNE HINTON**

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Defendants AstraZeneca Pharmaceuticals LP and AstraZeneca LP ("AstraZeneca") disclose and provide available case specific discovery information and documentation for Plaintiff **Joanne Hinton's** prescribing physician pursuant to Case Management Order No. 4 (hereinafter "CMO 4") as follows.

AstraZeneca is providing five categories of information and/or documents based on a query of its relevant databases and systems. The categories are: (1) Call Note Information; (2) Account Payable Information; (3) Dear Doctor or Dear Healthcare Provider Letters; (4) Prescriber-Level IMS Data; and (5) Professional Request Information. AstraZeneca has run search queries and provided information and documents as part of this Disclosure based upon the information provided by the Plaintiff's Fact Sheet ("PFS"). If the PFS is incorrect, inaccurate, or incomplete, then AstraZeneca's disclosures may also be incomplete.

It is not anticipated that the AstraZeneca counsel responsible for deposing the Plaintiff's prescribing physician will have any information or documentation from AstraZeneca's databases and systems about the prescriber beyond the information and documents identified and provided in this Disclosure.

**I. Call Note Information**

AstraZeneca has searched its sales call note databases for Plaintiff's prescribing physician, as reflected in the information provided by the PFS.

AstraZeneca found call notes related to "Jane Macdonnell." These call notes, related to Seroquel, are attached hereto as **Exhibit A**. AstraZeneca will provide this information in electronic format if requested.

**II. Account Payable Information**

AstraZeneca has searched its accounts payable database for Plaintiff's prescribing physician as well as for any institution or entity identified in the PFS as affiliated with the prescribing physician, without regard to whether the payment to such institution or entity relates in any way to the prescribing physician.

AstraZeneca found no information regarding payments made to "Jane Macdonnell."

**III. Dear Doctor or Dear Healthcare Provider Letters**

AstraZeneca has searched for the prescribing physician's name, as provided in the PFS, in the distribution lists for certain "Dear Doctor" and "Dear Healthcare Provider" letters. AstraZeneca states that there is no specific physician-identifying information on such "Dear Doctor" or "Dear Healthcare Provider" letters. Those letters were previously produced as part of the MDL document production, and will not be reproduced here.

If AstraZeneca has a record that a particular prescribing physician was sent one or more of the May 20, 2002, January 30, 2004, April 22, 2004, July 7, 2005, or November 6, 2006 letters, AstraZeneca will provide the relevant information in this section of the Disclosure. AstraZeneca has not yet located the distribution list for the May 20, 2002 letter and will supplement this disclosure if that distribution list is located and is accessible.

AstraZeneca did find the name "Jane Macdonnell" on the distribution lists for the April 22, 2004 and July 7, 2005 letters.

#### **IV. Prescriber-Level IMS Data**

AstraZeneca has only been able to search for and produce (if any) IMS data for the prescribing physician over the past 36 months because that is the only information readily available to AstraZeneca at this time. AstraZeneca is taking steps to access the IMS historical data for the prescribing physician beyond the past 36 months that has been archived in databases. In order to access this IMS historical data, AstraZeneca must take several complicated and time consuming steps. AstraZeneca is working as diligently and quickly as possible to complete these steps and will provide this data as soon as practicable.

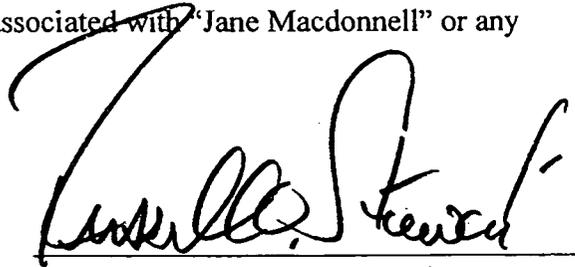
AstraZeneca has received consent from IMS Health, Inc. ("IMS") to produce certain prescription data relating to Plaintiff's prescribing physician. Use of IMS prescription data is subject to the terms of IMS' consent.

AstraZeneca found IMS data related to "Jane Macdonnell." The IMS data is attached hereto as **Exhibit B**.

V. **Professional Information Request Information**

AstraZeneca has searched its Professional Information Request ("PIR") database for Plaintiff's prescribing physician, as reflected in the information provided by the PFS. To the extent AstraZeneca has records of a written PIR response being sent to Plaintiff's prescribing physician, the documents and data about such response will be provided in this section of the Disclosure. AstraZeneca has not located PIRs associated with "Jane Macdonnell" or any related responses.

Dated: August 6, 2007



Russell O. Stewart  
Nadia G. Malik  
Faegre & Benson LLP  
3200 Wells Fargo Center  
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Denver, Colorado 80203  
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*Counsel for AstraZeneca Pharmaceuticals  
LP and AstraZeneca LP*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 6th day of August, 2007, I caused to be served a true and correct copy of the foregoing on K. Camp Bailey, Plaintiffs' Counsel, and Larry Roth, Plaintiffs' Liaison Counsel, via electronic mail and first-class mail. Service on Plaintiffs' Liaison Counsel constitutes service on all unrepresented plaintiffs.

A handwritten signature in black ink, appearing to read "Russell O. Stewart", written over a horizontal line.

Russell O. Stewart  
Nadia Malik  
Faegre & Benson LLP  
3200 Wells Fargo Center  
1700 Lincoln Street  
Denver, CO 80203-4532  
303-607-3500

*Counsel for Defendants AstraZeneca  
Pharmaceuticals LP and AstraZeneca LP*

**Hinton**  
**EXHIBIT A**

A	B	C	D	E	G	H	I	J	K	L	M
CONTACT_ID	FULL_NAME	CONTACT_TYPE	ADDRESS_LINE_1	ADDRESS_LINE_2	CITY	STATE	ZIP	REP_NAME	DUE_SUMMARY_DELIVER_DAT	CALL_TYPE	CALL_NOTES
1	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Miller, William J.	8/27/1999 0:00	Appt. - Sit Down Detail	is using reserpine in elderly, will cont to use the drug call for a new appt.
2	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Miller, William J.	10/28/1999 0:00	Appt. - Sit Down Detail	is using will cont 0 second call
3	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Miller, William J.	12/17/1999 0:00	Appt. - Sit Down Detail	dr will speak for two upcoming programs, the first will be for the residents at NY Cornell, the topic will be "Substance and prescription abuse in the elderly"; the second will be for the nurses on "Comorbidity in the Elderly, her/honorary is \$860 and she specializes in the geriatric population.
4	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Miller, William J.	12/13/1999 0:00	Appt. - Sit Down Detail	
5	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Bond, Catherine	2/18/2000 0:00	Appt. - Sit Down Detail	
6	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Bond, Catherine	3/31/2000 0:00	Appt. - Sit Down Detail	
7	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Bond, Catherine	4/12/2000 0:00	Appt. - Sit Down Detail	spoke to her about the upcoming dinner programs, the first is on prescription drug abuse and the second program is on comorbidity with the elderly, she will be at the APA in Chicago.
8	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Bond, Catherine	4/24/2000 0:00	Appt. - Sit Down Detail	
9	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Bond, Catherine	5/17/2000 0:00	Appt. - Sit Down Detail	confirmed topic and time for June '01 program, since the np's had to cancel, maybe a round table discussion?
10	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Bond, Catherine	5/28/2000 0:00	Appt. - Sit Down Detail	saw the dr to confirm the program for tomorrow night, also spoke to her about the June '01 program.
11	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Bond, Catherine	5/31/2000 0:00	Appt. - Sit Down Detail	
12	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Bond, Catherine	6/1/2000 0:00	Appt. - Sit Down Detail	
13	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Bond, Catherine	6/13/2000 0:00	Appt. - Sit Down Detail	dr did two programs for me-one for the residents and one for the np's, their is one check pending, she is happy with her practice, next time will bring me up most of her practice.
14	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Bond, Catherine	6/15/2000 0:00	Appt. - Sit Down Detail	one's info on the elderly.
15	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Bond, Catherine	6/28/2000 0:00	Appt. - Sit Down Detail	Spoke with Dr about her use of S. She sees alot of elderly patients and uses it to control psychosis due to organic disorders. She also sees some schizo and bipolar etc. I mentioned the favorable EPS profile with S and the benefits for the elderly patient. She agreed. She asked about an honorarium check she never received for a program last year. I will contact C. Bond to try and resolve issues. She signed for samples.
16	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Timmons, Jeffrey	2/28/2001 13:10	Inst call (CNS/Oncl/Urol)	Stopped in to speak with Dr. about the honorarium, she never received. Told her it would be out soon. Quick reminder of the benefits with S. She signed for samples.
17	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Timmons, Jeffrey	3/28/2001 18:12	Inst call (CNS/Oncl/Urol)	Talked with Dr about the new weight gain data in the Kasper reprint. Also went over high dose efficacy.
18	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Timmons, Jeffrey	6/20/2001 15:48	Stand-Up Call	Spoke with Dr she said she used to go into LTC but no more, said the reimbursement is terrible and it is too time consuming for the payment received, said she sees a few elderly that caregivers bring in to the office. Not a LTC target.
19	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Mattels, Jill	10/17/2001 0:00	Stand-Up Call	Talked with Dr about minimal weight gain with S. She mentioned G and I talked with her about S and QT interval.
20	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Timmons, Jeffrey	10/25/2001 0:00	Appt. - Sit Down Detail	
21											

A	B	C	D	E	G	H	I	J	K	L	M
CONTACT_ID	FULL_NAME	CONTACT_TYPE	ADDRESS_LINE_1	ADDRESS_LINE_2	CITY	STATE	ZIP	REP_NAME	DUE_SUMMARY_DELIVER_DAT	CALL_TYPE	CALL_NOTES
14949008	Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive Sebring	Sebring	FL	33870	Kunkle-Somma, Kristen	2/12/2002 10:44	Sit down Call	Kia-into to md...says she does not want many reps from same company calling on her...says she is only using her in geriatric pop...talked about dosing (need to bring elderly dosing card)...ops also effect profile n/c-kind out what her needs are when choosing entlastsch, check in when listing features (benefits)...follow up on speaker's reimbursement
22	14949008	Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive Sebring	FL	33870	Timmons, Jeffrey	2/28/2002 0:00	Stand-Up Call	Finally got check for Drs program from 2000. She was happy to get it and thanked me. I apologized a lot for the delay. Reminded her about S tolerability, she is using.
23	14949008	Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive Sebring	FL	33870	Kunkle-Somma, Kristen	3/20/2002 14:10	Stand-Up Call	Kia-kind of awkward since she came out to waiting room to talk to me and a pt was in there too...so invited her to case study program...she is very interested in attending...seems to like Dr. Smith...did not need samples, but appreciative to get the pill boxes...also gave her stain cd rom n/c-double check on her attendance for teh case study program...ask about pt who are complaining of zyprexa side effects
24	14949008	Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive Sebring	FL	33870	Kunkle-Somma, Kristen	4/8/2002 15:08	Sit down Call	Kia-wants to know how S compares to Geodon in terms of serum prolactin levels... (will send PIR)...also talked about weight gain as an issue w/ regards to atypicals...showed brecher portion of fill out case study paperwork and reminded that shw needed to prepare 2 cases n/c-follow up on case study (lots of respect for Dr. Smith) and go right after follow up on PIR for Geodon, still go right after zyprexa
26	14949008	Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive Sebring	FL	33870	Timmons, Jeffrey	4/11/2002 0:00	Stand-Up Call	Dr attended dinner case study at Ocean 211 in Stamford. I had a chance to speak with Dr before and after program about S.
28	14949008	Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive Sebring	FL	33870	Kunkle-Somma, Kristen	4/11/2002 22:48	Case Studies	Kia-nd attended case study program of management of atypical antipsychotics...turned out to be fantastic b/c all md's ended up telling Serquel success stories...discussed topics such as a pt controlled psychosis on zyprexa but gained over 40 lbs(macdonnell)...severe schiz pt soothg dogs w/ red eyes in shower (Glanett)...questions about levels of lipids, diabetes, weight gain (Kais, Mac)...questions about high functioning schiz (Tab)...Dr. Smith discussed keeping pts on the meds, like Zyprexa...but adding S and slowly over time taper off Zyprexa...Dr. Kais also had lots of questions about S sedation...efficacy of S in additive pts (will be sending lots of PIRs ) and following up on teh case study program n/c
27	14949008	Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive Sebring	FL	33870	Kunkle-Somma, Kristen	4/15/2002 10:42	Stand-Up Call	Kia-followed up on case study program last th, said she had a really good time and learned something new...also gave her the CME postcard for newscape "novel antipsy" program n/c-remind that check will be coming in about 4 weeks and follow up on the pt she talked about in case study program
28											

A	B	C	D	E	G	H	I	J	K	L	M
CONTACT_ID	FULL_NAME	CONTACT_TYPE	ADDRESS_LINE_1	ADDRESS_LINE_2	CITY	STATE	ZIP	REP_NAME	DUPLICATE_DATE	CALL_TYPE	CALL_NOTES
1	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sebring	FL	33870	Kunkle-Somma, Kristen	5/8/2002 11:50	Sit down Call	Kis-hand delivered honorarium for case study program in April-she once again thanked me for inviting her to be on the program...found out that she is 4 1/2 months pregnant w/ her first child (it is a boy) and she is due in Oct. n/c-see if she has had a chance to incorporate Serquel into the treatment regime of the Zyprexa pt who has gained so much weight...bring gestatic rating scale and see if I can bring in lunch next time
29	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sebring	FL	33870	Kunkle-Somma, Kristen	8/18/2002 15:04	Stand-Up Call	Kis-she talked to me for a few minutes before next pt...said that she needed 25 mg samples of Serquel, has been using more and is starting to implement in her pt she mentioned at case study program...gave her Schiz book and gestatic manual n/c-did about d2 theory and what she thinks of it.
30	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sebring	FL	33870	Kunkle-Somma, Kristen	7/8/2002 11:48	Sit down Call	Kis-worked on building some rapport at the beginning by asking about her pregnancy, oct (due date in Oct)...and she says she fainted in the heat last week, so it has been pretty tough for her...Serquel-went thru Kasper reprint and defined out efficacy for specific symptoms, like aggression and hostility n/c-follow up on Kasper and see if there was anything else she found interesting about S, any questions for me?
31	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sebring	FL	33870	Kunkle-Somma, Kristen	8/12/2002 13:53	Stand-Up Call	Kis-she was not feeling well this afternoon, w/ back pain from pregnancy etc...checked on samples, said she was all set (which worries me bc there was a BIG rise in zyprexa)...quickly asked about pt that she wanted to switch from zyp to serquel and she said it is just a very slow process-she has added 25mg of serquel to that pt n/c-what about other pts who seem to have gained weight and she is worried about diabetes...would she consider adding S to those pts too?
32	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sebring	FL	33870	Kunkle-Somma, Kristen	9/9/2002 0:00	Stand-Up Call	Kis-brought her the "Headache in Clinical Practice" book and talked about comorbidity of ha w/ psychials and mentioned that we also carry Zomig if she needs...said she needed more SQ samples since she is getting more comfortable w/ it, and she wanted to make sure she has enough before she goes out on maternity leave (has pts scheduled up to the 20th of Sept....it is that male grandchild, so naming her son "Clifton" after her grandfather)...wished her luck n/c-send card of congratulations for baby birth
33	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sebring	FL	33870	Kunkle-Somma, Kristen	1/20/2003 13:09	Stand-Up Call	Kis-MD back from maternity leave, had a pt waiting so she could not talk today...she asked for more SQ samples, says she is still preferring the 25mg doses for her pts (saw a younger adult pt in waiting room, so ask about that next time) n/c-by setting up lunch to get more time w/ her to discuss weight issues, ect
34											

A	B	C	D	E	G	H	I	J	K	L	M
CONTACT_ID	FULL_NAME	CONTACT_TYPE	ADDRESS_LINE_1	ADDRESS_LINE_2	CITY	STATE	ZIP	REP_NAME	DUE_SUMMARY	CALL_TYPE	CALL_NOTES
1	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Kunkle-Somma, Kristan	2/25/2003 16:15	Stand-Up Call	Re-discussed upcoming programs w/ Smith, this TH, Sheila and FCNS meeting in March....she seems very interested....also mentioned the weight normalizing data for SQ compared to the competition, she signed for more samples n/c- confirm attendance for upcoming programs, bring more elderly information
36	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Kunkle-Somma, Kristan	4/22/2003 12:48	Stand-Up Call	Kia-reminded her about weight normalizing data w/ Senoquel...all set w/ samples for now...she was too busy to set up a time for lunch, but go back in to try again...may be the best way to get some time w/ her.
38	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Timmons, Jeffrey	6/5/2003 11:42	Stand-Up Call	Dr was busy but able to get in a quick reminder about S. She said she is using with good results and I confirmed. She signed for samples.
37	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Kunkle-Somma, Kristan	7/1/2003 13:21	Sit down Call	Kia-MD mentioned concerns she has w/ cataracts and lenticular changes-said she had 2 younger pts that experienced distorted vision while on Senoquel and wondered if it had anything to do w/ SQ...brought out Naashlah and read thru lenticular changes paragraphs and explained updates of cataracts info but n/c-needed to bring AZ letter and cataracts leave behind for her review
39	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Timmons, Jeffrey	7/2/2003 18:30	Sit down Call	Followed up on cataract issue. Went over cataract fact sheet and letter as well as PI info. Talked about lardon program. She cannot attend.
38	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Timmons, Jeffrey	8/18/2003 16:56	Stand-Up Call	Went over data from veiligian report and stressed S benefits in terms of cognition. Dr all set with samples.
40	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Kunkle-Somma, Kristan	11/4/2003 17:52	Stand-Up Call	Kia-MD know that I am now back in territory after maternity leave...she said she has some questions about SQ dosing in her pt population (genitric), but had a pt waiting and could not discuss out in open...gave LTC slim jim to help with some info n/c-go back to find out her question/concern w/ SQ...is she ok w/ cataract issue?
41	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Kunkle-Somma, Kristan	1/19/2004 13:49	Stand-Up Call	Kia-MD is moving to Florida-did not want any samples, wished her luck...remove from STP
42	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	McLean, Jacquelyn G	4/7/2005 0:00	Sit down Call	She was extremely excited to see me. Has been at Marge Brewster for a year. In private practice in CT she had only one pt with schizophrenia-that has now changed. Discussed therapeutic dose in BP as a much prior to switching. Also mono and adjunct therapy. Some issues with medicald when high he dose and then 25 pm during the day-I discussed appropriate dose. Discussed sero with dopakoto and Li and 600 (400-800 as range) REviewed vouchers and they said they would use 12 by next week She gave one out while I was there. Very support staff, Mary Ellen is her nurse and she does the PAP. Dr is there 5 days a week. Very receptive. I gave tons of educational materials (books, bp, echitzophrenia, flip charts, meds) They need it all Great Call. Told them eff would be there next week to get samples going. Called Cliff and informed him of the situation.

A	B	C	D	E	G	H	I	J	K	L	M
CONTACT_ID	FULL_NAME	CONTACT_TYPE	ADDRESS_LINE_1	ADDRESS_LINE_2	CITY	STATE	ZIP	REP_NAME	SUMMARY	CALL_TYPE	CALL_NOTES
1	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Gindh, Clifford	4/20/2005 11:39	Stand-Up Call	I: mania and schiz. an. already went through ser vouchers Jackie gave, focusing on 600mg dose. said Diane Burton amp sees majority of schiz pts. using consta, but having pts get at pharmacy for reimbursement issues. convenient for pt.
44	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Gindh, Clifford	6/2/2005 12:36	Stand-Up Call	both drs and ARNP concerned about medicald formulary on 7/1. feel this limits pts options. will cause pt crisis. went over ser profile in mania and schiz. discussed switching profile for ser when converting other atypcs.
45	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Gindh, Clifford	6/22/2005 16:33	Stand-Up Call	I: mania and schiz. an. had dr sign under wrong name after I left. need to get samples ASAP. still very concerned about medicald formulary. encouraged her to give pts best options in ser and use starter packs.
46	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	McLean, Jacquelyn G	7/27/2005 0:30	Stand-Up Call	long discussion regarding zyp switches and how to complete safety. reviewed nsa book for suggestions—pif for liver enzymes
47	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Golden, Anna	1/20/2006 16:43	Stand-Up Call	intro. dr asked about prolactin levels. showed study that prolactin levels dropped. no dose related prolactin. also requested pt edu.
48	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Golden, Anna	2/1/2006 10:29	Stand-Up Call	review of walden reprint, discussed prolactin levels. asked about scholarships for schizo pts. will ask frank.
49	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Smith, Christopher T	2/6/2006 12:04	Sit down Call	both are very happy that we are calling on sabring now. informed of new dosing str coming in march
50	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Smith, Christopher T	2/23/2006 11:26	Stand-Up Call	I: bmv/schizo SN: reviewed target dosing to 600-800mg; new 400mg tablet will help out with help plans only offering 60 tablets a month
51	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Golden, Anna	3/1/2006 15:25	Stand-Up Call	office has plenty of samples!! Review of walden (entechol). also new 50 and 400mgs now available. formulary status for ser.
52	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Smith, Christopher T	3/6/2006 11:57	Sit down Call	both said that they are really using more of the higher doses; mostly samples of 200mg and 300mg; very happy that 400mg now available. I gave 3 packs of vouchers to Debbie
53	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Golden, Anna	3/31/2006 13:05	Stand-Up Call	nurse started alot of pts calling concerned about the aids from the lawyers. review of diabetes self sheet. also will be getting pt ed to give to pts about this. dr has not yet rec'd 50 or 400mg, but has been using the samples. did not really jump on oppt for the adherence program.
54	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Smith, Christopher T	4/5/2006 14:55	Sit down Call	I: bmv/schizo SN: gave npi items for b/lanidity and depression; like them very much; discussed how seroq only atyp to demonstrate 11/11 YMRS
55	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Smith, Christopher T	4/18/2006 13:30	Sit down Call	I: bmv/schizo SN: recognizing akathesia and other eps. seroq tolerab and safety; manage care formulates discussed
56	14949008 Macdonnell, Lois Jane	Physician	Marge Brewster Center	1558 Lakeview Drive	Sabring	FL	33870	Golden, Anna	5/10/2006 16:54	Stand-Up Call	told dr that we are sad to hear that she is leaving. informed her of medicald allowing up to 1200mg w/o p/a. review fda max la 800mg.
57											

**Subject:** hinston v. astrazeneca

**From:** "buffym@lpm-triallaw.com" <buffym@lpm-triallaw.com>

**Date:** Wed, 05 Sep 2007 10:55:41 -0500

**To:** russell stewart <rstewart@faegre.com>, Ken Bailey <kbailey@bpblaw.com>, Camp Bailey <CBailey@bpblaw.com>

please see attached correspondence.

sincerely,

buffy martines

stewart 090507.pdf	<b>Content-Type:</b> application/pdf <b>Content-Encoding:</b> base64
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UNITED STATES | ENGLAND | GERMANY | CHINA

RUSSELL STEWART  
RStewart@faegre.com  
(303) 607-3688

September 5, 2007

**VIA E-MAIL**  
**VIA FACSIMILE (713) 292-2755**

Buffy K. Martines, Esq.  
Laminack, Pirtle & Martines, L.L.P.  
440 Louisiana, Suite 1250  
Houston, TX 77002

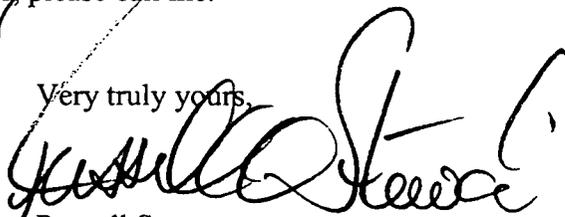
RE: *Joanne Hinton v. AstraZeneca Pharmaceuticals, L.P., et al.*  
MDL No. 1769; Docket No. 6:07-cv-10304

Dear Buffy:

Thank you for your letter dated September 5, 2007, bringing to our attention that certain physician payment information referenced in the call notes was not reflected in data obtained from the AZ accounts payable database. AZ will look into this discrepancy, and, if we discover that all available accounts payable information has not been provided, we will supplement our disclosures. If we discover a problem that may have affected disclosures in other cases, we will supplement those disclosures as well.

We will report to you the result of the investigation as soon as we can. If you have any questions or wish to discuss further, please call me.

Very truly yours,



Russell Stewart

STERO:mcwle

fb.us.2278149.01

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

IN RE: Seroquel Products Liability Litigation

MDL DOCKET NO. 1769

This Document Relates to:

Joanne Hinton v. AstraZeneca Pharmaceuticals  
LP, et al.

CASE NUMBER: 6:07-cv-10304

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**AstraZeneca's First Supplemental Disclosure of Available Case Specific Discovery  
Information and Documentation Pursuant to Case Management Order No. 4 for  
PLAINTIFF JOANNE HINTON**

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Defendants AstraZeneca Pharmaceuticals LP and AstraZeneca LP ("AstraZeneca") disclose and provide this first supplement to its August 6, 2007 Disclosure of Available Case Specific Discovery Information and Documentation Pursuant to Case Management Order No. 4 for Plaintiff **Joanne Hinton's** prescribing physician as follows.

**I. Prescriber-Level IMS Data**

IMS data related to "Jane Macdonnell" dating to March 1999 is attached as Exhibit A.

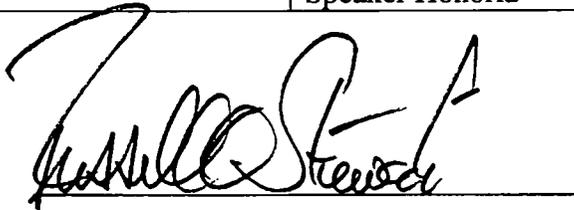
**II. Account Payable Information**

AstraZeneca has searched its accounts payable database for Plaintiff's prescribing physician as well as for any institution or entity identified in the PFS as affiliated with the prescribing physician, without regard to whether the payment to such institution or entity relates in any way to the prescribing physician.

AstraZeneca found the following information regarding payments made to "Jane Macdonnell":

DATE	VENDOR	AMOUNT	DESCRIPTION
06/22/2000	Lois Jane MacDonnell	\$650.00	Promotion Prep-Micro Marketing
02/11/2002	Lois Jane MacDonnell	\$650.00	Fees- Professional-Speaker Honoria
05/01/2002	Lois Jane MacDonnell	\$150.00	Fees-Professional-Speaker Honoria

Dated: September 11, 2007



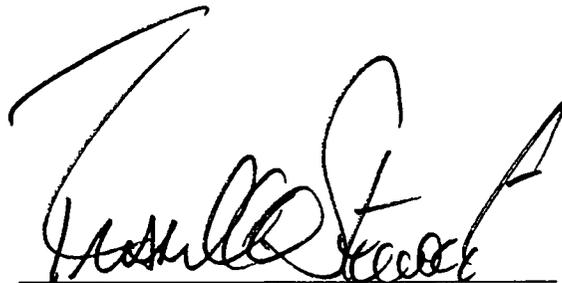
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E-mail: [fred.magaziner@dechert.com](mailto:fred.magaziner@dechert.com)

*Counsel for AstraZeneca Pharmaceuticals  
LP and AstraZeneca LP*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 11th day of September, 2007, I caused to be served a true and correct copy of the foregoing on K. Camp Bailey, Plaintiffs' Counsel, and Larry Roth, Plaintiffs' Liaison Counsel, via electronic mail and first-class mail. Service on Plaintiffs' Liaison Counsel constitutes service on all unrepresented plaintiffs.

A handwritten signature in black ink, appearing to read "Russell O. Stewart", written over a horizontal line.

Russell O. Stewart  
Nadia Malik  
Faegre & Benson LLP  
3200 Wells Fargo Center  
1700 Lincoln Street  
Denver, CO 80203-4532  
303-607-3500

*Counsel for Defendants AstraZeneca  
Pharmaceuticals LP and AstraZeneca LP*

**Hinton**  
**EXHIBIT A**

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
Name	Plaintiff	Affiliation	Address	City, State, Zip	IMSDR	BRAND	Jul-07	Jun-07	May-07	Apr-07	Mar-07	Feb-07	Jan-07	Dec-06	Nov-06	Oct-06	Sept-06
1	Dr. Jane Macdonnell	Margo Brewster Center,	928 Lakview Dr.,	Sebring, FL 33870	0745876	Seroquel	3	0	4	0	0	0	1	0	0	0	0
4	Dr. Jane Macdonnell	Margo Brewster Center,	928 Lakview Dr.,	Sebring, FL 33870	0745876	Market	6	3	8	10	7	6	7	7	3	7	6
5																	

A	B	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF	AG	AH	AI	AJ	AK	AL	AM	AN	AO
Name	Plaintiff	Aug-06	Jul-06	Jun-06	May-06	Apr-06	Mar-06	Feb-06	Jan-06	Dec-05	Nov-05	Oct-05	Sep-05	Aug-05	Jul-05	Jun-05	May-05	Apr-05	Mar-05	Feb-05	Jan-05	Dec-04	Nov-04	Oct-04
1	Dr. Jane Macdonnell	0	0	1	0	1	3	1	1	0	0	0	0	0	0	1	2	1	0	0	0	1	0	0
4	Hinton																							
5	Dr. Jane Macdonnell	6	4	6	5	9	16	8	11	12	6	8	6	8	9	3	7	6	2	2	2	2	0	2

A	B	AP	AO	AR	AS	AT	AU	AV	AW	AX	AY	AZ	BA	BB	BC	BD	BE	BF	BG	BH	BI	BJ	BK	BL
Name		Sep-04	Aug-04	Jul-04	Jun-04	May-04	Apr-04	Mar-04	Feb-04	Jan-04	Dec-03	Nov-03	Oct-03	Sep-03	Aug-03	Jul-03	Jun-03	May-03	Apr-03	Mar-03	Feb-03	Jan-03	Dec-02	Nov-02
1	Plaintiff	0	1	0	2	0	0	2	0	1	0	1	1	1	1	1	1	1	1	0	0	0	0	0
4	Dr. Jane Macdonnell	0	1	0	2	0	0	2	0	1	0	1	1	1	1	1	1	1	1	0	0	0	0	0
5	Dr. Jane Macdonnell	0	2	1	2	0	0	4	2	4	11	4	4	4	6	2	4	1	3	4	0	3	3	4

A	B	CJ	CK	CL	CM	CN	CO	CP	CO	CR	CS	CT	CU	CV	CW	CX	CY	CZ	DA	DB	DC	DD
Name		Nov-00	Oct-00	Sep-00	Aug-00	Jul-00	Jun-00	May-00	Apr-00	Mar-00	Feb-00	Jan-00	Dec-99	Nov-99	Oct-99	Sep-99	Aug-99	Jul-99	Jun-99	May-99	Apr-99	Mar-99
1	Plaintiff	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	Dr. Jane Macdonnell	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	Dr. Jane Macdonnell	1	1	0	0	0	1	0	0	2	2	0	0	0	2	0	1	1	1	1	1	1

**Subject:** hinton v. AZ

**From:** "buffym@lpm-triallaw.com" <buffym@lpm-triallaw.com>

**Date:** Tue, 25 Sep 2007 10:25:02 -0500

**To:** russell stewart <rstewart@faegre.com>, PMO Seroquel <PMOSeroquel@browngreer.com>, "Orran L. Brown" <OBrown@browngreer.com>

please see attached correspondence

sincerely,

buffy martines

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