

EXHIBIT 20

IN THE SUPERIOR COURT
OF THE STATE OF DELAWARE
IN AND FOR NEW CASTLE COUNTY

IN RE:
SEROQUEL LITIGATION : MDL NO. 1769

:
THIS DOCUMENT RELATES:
TO ALL ACTIONS :

IN RE: : SUPERIOR COURT
RISPERDAL/SEROQUEL/ : OF NEW JERSEY
ZYPREXA LITIGATION : LAW DIVISION
: MIDDLESEX COUNTY
: CASE NO. 274

AIMEE DANIELS, : IN THE CIRCUIT
: COURT OF THE
V. : COUNTY OF ST. LOUIS
: STATE OF
ASTRAZENECA : MISSOURI
PHARMACEUTICALS, L.P. : 05CC-004759
ET AL. : DIVISION 6

SANTOS MALDANADO, : IN THE CIRCUIT
minor, by and through: COURT OF THE
his natural mother : COUNTY OF ST. LOUIS
and next friend, : STATE OF
LOUISE WILSON : MISSOURI
V. : 06CC-003930
JANSSEN PHARMACEUTICA: DIVISION 6
L.P., ET AL. :

June 20, 2007

C O N F I D E N T I A L

30(b)(6) deposition of ASTRAZENECA
PHARMACEUTICALS, L.P., by and through
ALFRED PAULSON.

Golkow Technologies, Inc.
One Liberty Place, 51st Floor
1650 Market Street
Philadelphia, Pennsylvania 19103
877.370.3377

1 LENA BARNETT, minor, : IN THE CIRCUIT
 by and through her : COURT OF THE
 2 natural mother and : COUNTY OF ST. LOUIS
 next friend, : STATE OF
 3 MARY BARNETT : MISSOURI
 V. : 06CC-000333
 4 JANSSEN PHARMACEUTICA: DIVISION 6
 L.P., ET AL. :

5 -----
 6 LOIS BAER, as : IN THE CIRCUIT
 Representative of the: COURT OF THE
 Estate of MATTHEW : COUNTY OF ST. LOUIS
 7 BAER, Deceased : STATE OF
 V. : MISSOURI
 8 JANSSEN PHARMACEUTICA: 06CC-002401
 L.P., ET AL. : DIVISION 6

9 -----
 10 TERRY STRINGER : IN THE CIRCUIT
 : COURT OF THE
 V. : COUNTY OF ST. LOUIS
 11 : STATE OF
 JANSSEN PHARMACEUTICA: MISSOURI
 12 L.P., ET AL. : 06CC-002173
 : DIVISION 6

13 -----
 14 STEPHEN ROSAS : IN THE CIRCUIT
 : COURT OF THE
 V. : COUNTY OF ST. LOUIS
 15 : STATE OF

16 ASTRAZENECA : MISSOURI
 PHARMACEUTICALS, : 05CC-004755
 L.P., ET AL. : DIVISION 6

17 -----
 18 PAMELA MOORE, : IN THE CIRCUIT
 : COURT OF THE
 V. : COUNTY OF ST. LOUIS
 19 : STATE OF
 JANSSEN PHARMACEUTICA: MISSOURI
 20 L.P., ET AL. : 05CC-006375
 : DIVISION 6

21
 22
 23
 24

1 APPEARANCES:
 2
 3 CRUSE, SCOTT, HENDERSON & ALLEN,
 LLP
 4 BY: T. SCOTT ALLEN, JR., ESQUIRE
 7th Floor
 5 2777 Allen Parkway
 Houston, Texas 77019-2133
 6 (713) 650-6600
 sallen@crusescott.com
 Counsel for the Plaintiffs

7
 8 LAMINACK, PIRTLE & MARTINES, LLP
 9 BY: THOMAS W. PIRTLE, ESQUIRE
 440 Louisiana, Suite 1250
 10 Houston, Texas 77002
 (713) 292-2750
 11 tomp@lpm-trailaw.com
 Counsel for the Plaintiffs

12
 13 PEPPER HAMILTON LLP
 BY: ALLYSON LANE BACCINI, ESQUIRE
 14 3000 Two Logan Square
 18th and Arch Streets
 15 Philadelphia, Pennsylvania 19103
 (215) 981-4781
 16 baccinia@pepperlaw.com
 Counsel for Eli Lilly & Co.

17
 18 BAKER BOTTS LLP
 BY: RICHARD L. JOSEPHSON, ESQUIRE
 and
 19 ELIZABETH EVE BAKER, ESQUIRE
 One Shell Plaza
 20 910 Louisiana
 Houston, Texas 77002
 21 (713) 229-1234
 richard.josephson@bakerbotts.com
 22 elizabeth.baker@bakerbotts.com
 23 Counsel for AstraZeneca
 24

1 KATHRYN SCHULTZ, : SUPERIOR COURT OF
 ET AL. : THE STATE OF
 2 : CALIFORNIA IN AND
 V. : FOR THE COUNTY OF
 3 : SAN FRANCISCO
 ASTRAZENECA : CGC-06-453676
 4 PHARMACEUTICALS, :
 L.P., ET AL. :

5 -----
 6
 7 30(b)(6) deposition of ASTRAZENECA
 8 PHARMACEUTICALS, L.P., by and through
 9 ALFRED PAULSON, taken pursuant to notice,
 10 was held at the Four Seasons Hotel, One
 11 Logan Square, Philadelphia, Pennsylvania
 12 19103 commencing at 9:05 a.m., on the
 13 above date, before Linda Rossi Rios, RPR,
 14 CSR and Notary Public.

15
 16
 17
 18
 19
 20
 21
 22
 23
 24

1 APPEARANCES (cont'd):
 2
 3 DRINKER BIDDLE & REATH LLP
 BY: VIKTORIYA MEYEROV, ESQUIRE
 4 One Logan Square
 18th and Cherry Streets
 Philadelphia, Pennsylvania 19103
 5 (215) 988-1136
 viktoriya.meyerov@db.com
 6 Counsel for Janssen Pharmaceuticals
 7

8 HOGAN & HARTSON, LLP
 BY: MONICA N. SAHAF, ESQUIRE
 9 Columbia Square
 555 Thirteenth Street, NW
 10 Washington, DC 20004
 (202) 637-5532
 11 mnsahaf@hhlaw.com
 Counsel for Bristol Myers

12
 13 ALSO PRESENT:
 14
 15 CHUCK HUNGER, Paralegal
 JENNIFER MARTIN, Paralegal
 16 ROBERT McDONALD, Videographer
 17
 18
 19
 20
 21
 22
 23
 24

Page 102

1 have you ever been involved in any
 2 forecasting or been privy to any
 3 forecasting for Seroquel while you've
 4 been at AstraZeneca?
 5 A. No.
 6 Q. Ever?
 7 A. No.
 8 Q. Okay. On your resume in
 9 1993 to 1994, it's listed, the second
 10 bullet point, that you lead the
 11 conversion of the sales organization from
 12 IMS retail outlet-based data to
 13 prescription-based data while you were at
 14 Zeneca?
 15 A. That's correct.
 16 Q. Has that structure for the
 17 sales organization from IMS retail
 18 outlets-based data to prescription-based
 19 data remained in effect up until today
 20 while you are at AstraZeneca?
 21 A. No.
 22 Q. I think I know, but I want
 23 the jury to make sure I understand, what
 24 does it mean, when you lead the

Page 103

1 conversion of the sales organization from
 2 IMS retail outlet-based data to
 3 prescription-based data, what does that
 4 mean?
 5 A. So prior to '93, the way the
 6 data supplied to AstraZeneca came in
 7 form, it was prescription, new RX
 8 prescription, TRX prescription.
 9 Q. Wait. You need to --
 10 A. Got it. New RX
 11 prescription.
 12 Q. How do you spell that?
 13 A. New, N-E-W, R-X.
 14 Q. New RX?
 15 A. RX.
 16 Q. I know what you meant. I
 17 didn't understand you.
 18 A. Sorry.
 19 Q. New RX, and what did you
 20 say?
 21 A. T, for total, RX data.
 22 Q. Right.
 23 A. Reported to an outlet level,
 24 meaning a retail store, a pharmacy. The

Page 104

1 data got better, the data actually then
 2 could be reported in approximation to the
 3 physician level.
 4 Q. Right. So what you're
 5 saying is -- and you got this data from
 6 third-party vendors, did you not?
 7 A. Correct.
 8 Q. Okay. And AstraZeneca still
 9 gets this prescription-based data from
 10 third-party vendors, does it not?
 11 A. Correct.
 12 Q. And what you're telling me
 13 is that AstraZeneca has the ability,
 14 through the gathering of data from
 15 third-party vendors, to determine what a
 16 particular physician's prescribing
 17 behavior is in regard to not only
 18 Seroquel in particular, but all CNS
 19 products in general, are you not?
 20 A. Yes.
 21 Q. Yes. So before this
 22 professional sales specialist in
 23 Philadelphia who walks into a physician's
 24 office, that professional sales

Page 105

1 specialist has at his or her disposal a
 2 database of information which identifies
 3 for that professional sales specialist
 4 what medications that doctor prescribes
 5 in the CNS area, the number of
 6 prescriptions of particular medications,
 7 be it Risperdal versus Seroquel or
 8 Zyprexa versus Seroquel. The
 9 professional sales specialist has data
 10 that tells that professional sales
 11 specialist how much Seroquel that doctor
 12 prescribes, how much Zyprexa that doctor
 13 prescribes, what are old prescriptions
 14 and what are new prescriptions. Is that
 15 true?
 16 A. I'd like to break that
 17 question down into all of its components.
 18 Q. Sure. Please do. I'd love
 19 you to.
 20 A. So if you could repeat the
 21 question?
 22 Q. How about this. What data
 23 in regard to prescription, what
 24 prescription data does a professional

Page 106

1 sales specialist have on an individual
2 physician before that professional sales
3 specialist goes into that doctor's
4 office?
5 A. So they have new RX, and TRX
6 data.
7 Q. Tell the jury new RT means
8 new prescription data?
9 A. New prescription.
10 Q. And TRX means total
11 prescription?
12 A. Correct.
13 Q. What else do they have?
14 A. They have that -- they have
15 that information for Seroquel and other
16 atypical antipsychotics.
17 Q. And the other atypical
18 antipsychotic would be Geodon, Abilify,
19 olanzapine, Risperdal, what else?
20 A. Correct. Clozaril.
21 Q. Clozaril. That's a second
22 generation antipsychotic?
23 A. Right.
24 Q. It's the most effective

Page 107

1 second generation antipsychotic. Have
2 you been trained on that? Did you know
3 Clozaril is the most effective second
4 generation antipsychotic? Have they
5 trained you on that there at AstraZeneca?
6 A. I've been trained on
7 Clozaril.
8 Q. And is it the most effective
9 second generation antipsychotic in your
10 training?
11 A. I don't recall.
12 Q. You don't recall. You've
13 been trained on the CATIE results?
14 A. No.
15 Q. Do you know what the CATIE
16 study is?
17 A. No.
18 Q. Are you familiar with the
19 fact -- has anybody told you in your role
20 as the professional sales
21 specialist/national sales director that
22 the discontinuation rates for second
23 generation antipsychotics in the CATIE
24 study were alarmingly high? Has anybody

Page 108

1 told you that?
2 A. No.
3 MR. JOSEPHSON: Objection.
4 BY MR. ALLEN:
5 Q. As the national sales
6 director, are you ever -- do you ever
7 have any interaction with the scientific
8 affairs department or medical affairs
9 department or any department who updates
10 you on the most recent safety and
11 efficacy studies being done on second
12 generation antipsychotics in general
13 and/or Seroquel in particular?
14 A. No.
15 Q. Okay. As national sales
16 director, and/or in your previous role as
17 regional commercial leader, have you ever
18 been taught, informed of, received a
19 report on, given any information on, in
20 your role at AstraZeneca, on the CATIE
21 study, on the CLASS study, on the
22 consensus statement, have you ever
23 received any information or reports on
24 those types of data in your role as

Page 109

1 either regional commercial leader or
2 national sales director?
3 A. No.
4 Q. Is there any method,
5 mechanism, protocol, policy or procedure
6 at AstraZeneca whereby the professional
7 sales specialist and/or their directors,
8 be it area directors, regional managers
9 or national directors, whether anybody in
10 the sales department is updated, given
11 reports on, written information on the
12 most recent epidemiology studies or
13 scientific studies concerning second
14 generation antipsychotics in general or
15 Seroquel in particular?
16 A. No.
17 Q. No. So, therefore, it would
18 be impossible, literally impossible for a
19 pharmaceutical sales specialist to inform
20 a physician of the most recent scientific
21 and/or epidemiology information
22 concerning second generation
23 antipsychotics in general or Seroquel in
24 particular since the professional sales

Page 198

1 into the Touchstone system and look at a
2 call history, that is how many times this
3 doctor has been called upon by any sales
4 representative for AstraZeneca?
5 A. That's correct. There's
6 limited history in there, but that's
7 correct, they could look back.
8 Q. Okay. And the call notes
9 are in there, what transpired in the
10 doctor's office previous -- on previous
11 visits?
12 A. Again, limited history.
13 Q. Okay. But there's
14 information on that?
15 A. That's correct.
16 Q. You said selling. You said
17 on this database the sales aids that are
18 available to the detail or the
19 pharmaceutical sales rep are available on
20 this software system?
21 A. That's correct. Our
22 approved promotional pieces are on the
23 software.
24 Q. And can they be downloaded

Page 199

1 by the sales representative?
2 A. No.
3 Q. Okay. It just gives a
4 listing of what's available?
5 A. No, the actual materials are
6 there. The rep doesn't download. The
7 materials, when they're updated, are
8 pushed to the rep.
9 Q. Actually the physical
10 materials are in the representative's
11 hands?
12 A. They do have promotional
13 materials in their hand. They also have
14 promotional material on the laptop.
15 Q. Gotcha. And they can use a
16 laptop with the physician and/or
17 healthcare provider. Is that right?
18 A. That's correct.
19 Q. And the third general
20 category of information is the data, you
21 said the data would be the prescription
22 history, the sales rep could determine
23 how much this doctor does or does not
24 prescribe second generation

Page 200

1 antipsychotics. Is that correct?
2 A. That's correct.
3 Q. They could determine how
4 many scripts the doctor is writing of
5 Risperdal, or Abilify, or Zyprexa and
6 Seroquel. Is that right?
7 A. That's right.
8 Q. They can determine the dates
9 of the prescriptions, whether they're new
10 prescriptions or whether they're old --
11 refills of old prescriptions. Is that
12 correct?
13 A. That's incorrect.
14 Q. Okay. Well, tell me what
15 they can tell about that.
16 A. So they can -- they see new
17 RXes, which the definition of that is a
18 new piece of paper or a refill. There's
19 no date associated with that.
20 Q. Okay.
21 A. And then TRX, which is
22 total, so that would be new and refills.
23 I'm sorry, new pieces of papers, refills
24 on all historical.

Page 201

1 Q. Now, what system -- is
2 Touchstone the primary, if that's the
3 word, you tell me if it's not, is
4 Touchstone the primary software system or
5 database that's utilized by the PSSes on
6 a daily basis?
7 A. Yes.
8 Q. Okay. What system was used
9 prior to Touchstone to provide the sales
10 representatives with the same
11 information?
12 A. It was limited in the
13 information it had. It didn't have all
14 of what Touchstone has, but Compass.
15 Q. Compass. Okay. When was
16 Compass, approximately, you've
17 actually -- you know, we've looked at
18 your CV a lot. You've been involved in
19 sales either at Zeneca or AstraZeneca
20 since 1994. When was Compass -- when did
21 it begin to be utilized by the PSSes?
22 A. Again, an approximation.
23 Q. Yes, sir.
24 A. Around 2000.