

# EXHIBIT 6

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July 23, 2007

**VIA E-MAIL AND FIRST CLASS MAIL**

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San Francisco, CA 94104

Re: Beverly Getchell v. AstraZeneca Pharmaceuticals, LP, et al.  
Case Number: 6:06-cv-01314

Dear Counsel:

Enclosed please find AstraZeneca's Disclosure of Available Case Specific Discovery Information and Documentation Pursuant to Case Management Order No. 4 in the above-captioned case.

Sincerely,

  
Ginny W. Dorsey

Enclosures

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

In Re: Seroquel Products Liability Litigation Case No. 6:06-md-01769-ACC-DAIS

MDL Docket No. 1769

This Document Relates to:

Beverly Getchell v. AstraZeneca  
Pharmaceuticals LP, et al.

CASE NUMBER: 6:06-cv-01314

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

Defendants AstraZeneca Pharmaceuticals LP and AstraZeneca LP

("AstraZeneca") disclose and provide available case specific discovery information and documentation for Plaintiff Beverly Getchell ("Plaintiff") and her 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. 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. If Plaintiff serves an amended PFS with additional information about the prescribing physician, AstraZeneca will endeavor to conduct further searches based upon the amended information as warranted and reasonable.

Finally, 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, for the period encompassing six months prior to the Plaintiff's first use of Seroquel through six months after the Plaintiff's last use of Seroquel ("Relevant Time Period").

AstraZeneca found call notes related to "Dr. Peter Ramirez" at the address provided by the PFS. These call notes, related to Seroquel and for the Relevant Time Period, are attached hereto 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 no records related to "Dr. Peter Ramirez" at the address provided by the PFS.

**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 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 accessible.

AstraZeneca found the name “Dr. Peter Ramirez,” at the address provided by the PFS, on the distribution list for the November 6, 2006 letter.

#### **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 24 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 24 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.

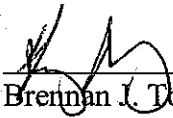
AstraZeneca found IMS data related to “Dr. Peter Ramirez” at the address provided by the PFS. The IMS data is attached hereto as Exhibit B.

**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 record 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 found no records relating to “Dr. Peter Ramirez” at the address provided by the PFS regarding Seroquel.

Dated: July 23, 2007


  
\_\_\_\_\_  
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Cira Centre  
2929 Arch Street  
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215-994-4000

Counsel for Defendants AstraZeneca  
Pharmaceuticals LP and AstraZeneca LP

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 23<sup>rd</sup> day of July, 2007, I caused to be served a true and correct copy of the foregoing via electronic mail and first-class mail on the following:

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Counsel for Defendants AstraZeneca  
Pharmaceuticals LP and AstraZeneca LP

Dated: July 23, 2007

**EXHIBIT A**







**DUE\_SUMMARY\_DELIVER\_DATE\_CALL\_TYPE**

5/17/2004 10:37 Stand-Up Call  
 9/1/2004 14:00 Stand-Up Call  
 11/10/2004 11:28 Office Manager  
 11/30/2004 10:18 Office Manager  
 1/3/12006 9:21 Stand-Up Call  
 2/27/2006 10:59 Stand-Up Call  
 3/20/2006 10:04 Sit down Call  
 4/10/2006 12:15 Sit down Call  
 5/4/2006 17:22 Stand-Up Call  
 6/26/2006 15:34 Stand-Up Call  
 7/31/2006 15:46 Stand-Up Call  
 8/23/2006 15:53 Stand-Up Call  
 8/19/2004 23:07 Gatekeeper  
 2/3/2005 14:50 Office Manager  
 2/16/2005 15:44 Sit down Call  
 3/24/2005 18:42 Stand-Up Call  
 5/25/2006 11:19 Stand-Up Call  
 6/8/2006 11:41 Stand-Up Call  
 7/10/2006 19:31 Stand-Up Call  
 2/10/2005 15:45 Gatekeeper  
 3/16/2005 16:14 Stand-Up Call  
 4/27/2005 15:12 Stand-Up Call  
 5/18/2005 15:33 Stand-Up Call  
 6/8/2005 13:18 Stand-Up Call  
 6/22/2005 13:22 Stand-Up Call  
 7/20/2005 13:32 Stand-Up Call  
 8/10/2005 16:20 Gatekeeper  
 9/21/2005 15:26 Stand-Up Call  
 10/12/2005 15:44 Stand-Up Call  
 11/2/2005 16:44 Stand-Up Call  
 11/23/2005 14:10 Stand-Up Call  
 12/14/2005 14:37 Stand-Up Call  
 8/10/2004 0:00 Gatekeeper  
 8/16/2004 0:00 Gatekeeper  
 9/20/2004 11:00 Sit down Call  
 10/11/2004 0:00 Stand-Up Call

**CALL\_NOTES**

dosing messgw/ bipolar ind given ar eps inserv.  
 CME Inv  
 84 day lit - leavebehind w/ note and b card req appt or lunch access.....  
 lit leavebehind at middletown hosp - left notes w/ req for access.  
 Dual call...  
 Discussed appropriate dosing.  
 reminded about rapid titration.  
 Discussed 50mg and 400mg.  
 Caffe.  
 MDQ  
 EPS across dose range.  
 Discussed 85 Symptoms  
 spoke w/ Rose-he and dr alwis are seeing pts. here--part of transitional living.  
 Located off Day-Xenia Rd. off of 35. In on Tues & Wed. fm. 11:00 o. No lunches.  
 Wife, Diana is gatekeeper in Dayton. See's Serouquel reps @ Middletown and Transitional lit  
 No samples needed. Caught unexpectedly in ofc.  
 Serouquel first. Office no longer accepting samples but owuld like vouchers. New office in A  
 S first/Akathisa  
 Serouquel first  
 Introduced myself to psychologist. Let me know that dr is only at this location on Wed.  
 Was able to pass on information about negative symptoms and what S can do for his pts.  
 Ok on samples. Efficacy/tolerability. Take in a set of pt assistance forms next time so they  
 Stressed dosing and avoiding somnolence with titration.  
 600 mg dosing  
 tolerability with dosing  
 focused on reliability over 8 years  
 no one in office  
 dr stopped and let me know he's having some problems in Middletown with street value of s  
 not concerned with calle. definitely appreciates tolerability of s.  
 doing well with s. plenty of samples as he is moving them over from the middletown office  
 great with samples as they compiled the two offices. no problems with s. looking for a new  
 doing well with s. let know that i am being promoted and that army will be taking care of their  
 He is in at Middletown Mon AM and Hamilton Monday PM - Spoke with receptionist - his nur  
 Missed Dr. R  
 Met Dr. R and Becky Jiminez - LPN- reviewed 12 week data and YMRS data - she thought i  
 Invite to profiles meeting

10/18/2004 0:00	Stand-Up Call	Spoke with Heather and Dr. R about sample management and pt asst
11/1/2004 0:00	Gatekeeper	Not in today - sick
11/8/2004 0:00	Stand-Up Call	Dosing and Now I can message
11/15/2004 0:00	Stand-Up Call	PAP - Focused on Works Early data
12/20/2004 16:42	Stand-Up Call	Reminded him of the Now I Can and 600 mg
1/31/2005 19:13	Gatekeeper	Missed him at clinic
2/7/2005 10:43	Stand-Up Call	He does not like starter pack - he doses higher initially - yeah! His nurses reported to me th
3/21/2005 14:11	Gatekeeper	Dr. Ramirez is off for the week - the sample closet is loaded - How? Becky swears they are
4/4/2005 0:00	Stand-Up Call	Still do not need samples - I hope this is because he was off ?? Talked about inservice I ga
5/2/2005 15:47	Stand-Up Call	Start on Sqi - stay on Sqi - Number 1
5/9/2005 10:10	Stand-Up Call	I need to talk with Becky and see if she has a suggestion on how to get Dr. Ramirez to be n
5/23/2005 13:12	Gatekeeper	He is off today
8/15/2005 9:34	Stand-Up Call	Need samples but no allocations for me yet -
8/29/2005 11:32	Gatekeeper	Did not see me - I have no samples yet!
9/12/2005 9:30	Stand-Up Call	They ared way oversampled - how is this?? Said they are still starting new pts
9/19/2005 14:16	Gatekeeper	No samples needed / no access
10/17/2005 10:25	Stand-Up Call	Started a discison about akathisia. He reports that he screens for this. Emphasized dose to
10/31/2005 15:28	Stand-Up Call	Got new schedule - asked about how /if he interacts with jails - not much
11/7/2005 15:42	Stand-Up Call	Tried to pinpoint his on when he would not use Sqi first line - he avoided the question
6/19/2006 14:44	Stand-Up Call	Sqi - hostility
1/13/2004 0:00	Gatekeeper	tried to catch at Central Ave location - only there on Mondays - got contact name and numbr
1/29/2003 16:34	Gatekeeper	Per Heather he is working Monday 10-3 and proceeding with his own private practice but w
3/10/2003 13:39	Sit down Call	Discussed dosing and rapid titration. samples for both locations.
3/10/2003 14:23	Sample Drop	samples for his office
4/30/2003 15:44	Gatekeeper	Has changed TLC-Middletown hours back to M and not W as planned, 10-3, nco. Next mork
6/30/2003 14:44	Inservice Paramed	Middletown Site-Met with Lisa and Heather. Had committed to Heather last week that I would
8/12/2003 12:23	Gatekeeper	Darlene will remind him tomorrow morning of dr. Delbello speaker program at medical staff r
11/24/2003 14:45	Stand-Up Call	He has reduced hours here from 9-12, Heather is still working with him, starter pack ad
12/1/2003 15:07	Follow Up	he was supposed to work until 5 but entire afternoon of patietns all cancelled so caught hea
12/8/2003 15:01	Gatekeeper	TLC- Came up here today to see him and he was not in due to being supeonared to court. H
12/15/2003 15:18	Stand-Up Call	TLC-Hamilton. Clinic was absolutely packed. Lots of patients came in today that weren't on
12/18/2003 12:54	Stand-Up Call	Geodon rep came in after I had been waiting to see him and Dr. R came out with patient at 1
9/15/2004 10:44	Virtual Detailing	SEROQUEL bipolar mania virtual detail for Psychiatrists, Program 1-Complete.

ring. Up to date on all data.

allergy and asthma bldg. by Papa Johns.

can have them on file.

patients typically asking for 100-300 mgs.

office in beaver creek and are hoping to move in about 3 months.

n. office will be close the week between X-mas and new years

se is Becky Jimenez - she is in on Wednesdays - they were unsure if she is an NP or RN/LPN

starter packs would be good - R did not like them - Seemed to be many coming in for injections this day. Promised a follow up for educ program with I

at they are using more Sql and titrating quicker with higher initial dose  
: using lots of Sql - she does not know if they are bringing it from other locations  
we at Hamilton location

more communicative - Reminded him of dosing

efficacy - no surprises

er to follow up  
ite is not coming to Middletown location, just Beaver creek because she is still working at the hospital so he is doing it all, phones, etc

jay route  
I call on this site and Dr.R today and Dr. Ramirez had left in last 1/2 hour for a family emergency but did not know details! He does need samples so w  
meeting on Thursday.

ther as she was leaving, will come back for more time next monday, talked outside and it was really cold so let her go if I go have time next week at r  
eather said that he called them on Friday to let them know that he wouldn't be in, she knew I was coming in today and apologized for not calling me to  
the schedule plus the women's grp meets this pm which made it even more chaotic. He was almost an hour behind so had to just have him sign and r  
the same time, fortunately only wanted S for midd and beaver creek pp so he left and was able to focus on 600-800mg dosing target and s.e. profile fo

Dee at PP office

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will need to get another tic doctor to sign and send to this site

did in am or ham. pm  
let me know, had my card at Ham. site so couldn't call me this morning. told her it was ok talked about a few of the patients in women's group, will pu  
remind him of 600-800mg target dose and well, accepted which came from conversation with BP female in lobby who told me she is on 800mg Serogu  
r all of his patient types



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t on route for next monday (NCO)  
el and that it has changed her life and she has never felt better. she has been on Z (gained 50 lb), R (make her agitated, 'c

**EXHIBIT B**

First Name	Last Name	IMSDR	BRAND	May-07	Apr-07	Mar-07	Feb-07	Jan-07	Dec-06	Nov-06	Oct-06
PETER	RAMIREZ	0406486	Seroquel	0	0	0	0	0	0	0	0
DENISE	BOUDIETTE	0737901	Seroquel	23	23	16	15	25	27	26	19
WILLIAM	COLLIE	0785909	Seroquel	8	10	8	8	3	4	8	14
VIVIAN	HORTON	0801392	Seroquel	1	1	1	1	6	2	1	2
KASTURI	KRIPAKARAN	2016764	Seroquel	3	1	1	0	8	2	11	2
JANE	JOOST	2020951	Seroquel	32	35	37	26	40	25	30	18
PETER	RAMIREZ	0406486	Market	0	0	0	0	0	0	2	0
DENISE	BOUDIETTE	0737901	Market	49	43	53	41	51	62	56	43
WILLIAM	COLLIE	0785909	Market	65	60	65	70	69	54	62	71
VIVIAN	HORTON	0801392	Market	4	8	3	7	9	8	8	9
KASTURI	KRIPAKARAN	2016764	Market	5	6	12	6	14	9	18	10
JANE	JOOST	2020951	Market	160	153	150	128	150	115	126	105

SQL

Sep-06	Aug-06	Jul-06	Jun-06	May-06	Apr-06	Mar-06	Feb-06	Jan-06	Dec-05	Nov-05	Oct-05	Sep-05
0	0	0	0	0	6	11	11	13	18	22	18	18
30	35	26	12	15	11	23	20	39	39	35	47	39
11	15	10	18	11	15	14	12	14	8	8	7	8
1	1	1	1	1	2	5	2	1	1	1	1	2
8	4	9	2	5	8	5	5	6	4	9	4	4
24	25	14	20	16	13	13	13	21	15	11	11	19
7	5	9	16	32	64	75	66	85	97	107	88	107
54	76	53	39	46	56	85	81	111	117	133	135	132
66	59	65	67	60	62	67	55	67	49	49	40	48
6	14	6	9	7	9	18	15	9	14	8	6	6
15	17	19	18	24	20	25	18	24	23	31	24	24
120	104	85	107	109	85	94	81	119	109	120	107	126

SQL

Aug-05	Jul-05	Jun-05
16	19	18
57	36	35
9	6	6
1	1	1
5	9	14
19	24	24
119	118	99
153	112	124
45	44	44
6	4	5
30	64	84
132	141	161