

EXHIBIT H

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In Re: Seroquel Products)
Liability Litigation,)
MDL Docket No. 1769,)
)
This document relates to:)
)
Turner v. AstraZeneca LP,)
et al.)
(Althea Turner)
6:07-CV-15435))

DEPOSITION OF LUIS GIUFFRA, M.D.

TAKEN ON BEHALF OF DEFENDANT

OCTOBER 11, 2007

Reported by Celena D. Moulton, RPR, CCR

1 been compliant with Seroquel. She usually tells me she
2 has a very hard time sleeping without it, so that's a
3 strong incentive.

4 Q. If you did not have the atypicals available
5 to you and if she was not willing to take Lithium, what
6 would you be prescribing for her, doctor?

7 A. Probably Depakote or Carbamazepine, which
8 is the generic for Tegretol. That would have been the
9 next group of meds to try.

10 Q. Seroquel is a better choice for her than
11 those?

12 A. Well, right now, I think after having done
13 well for six years, yeah. I would have a hard time
14 stopping something that has kept her out of the hospital
15 for all these years.

16 Q. What would her daily life be like if she
17 were not on medication of any kind for bipolar disorder?

18 A. I think she would be significantly impaired
19 without those medications. She may again go into mania
20 or depression or both, and would have a hard time
21 functioning.

22 Q. Do you know whether she has had any suicide
23 attempt other than the one in 1984 that you reference in
24 your initial intake notes?

25 A. I don't know of any other.

1 Abilify and Geodon, are not marked for risk of diabetes?

2 A. Yes.

3 Q. Is that your understanding, that there's
4 not a risk of diabetes associated with those two drugs?

5 A. No. I would say that this table follows
6 what I was telling you guys earlier, that I would put
7 Clozapine and Olanzapine in the first group, Seroquel
8 and Risperidone in the second group, and Geodon and
9 Abilify in the third group.

10 But I wouldn't say that the risk is zero.
11 I mean, we know there are some cases where it could
12 still be problematic. But I agree that they are less
13 likely. So I wouldn't say zero. That wouldn't be my
14 understanding today, in 2007.

15 Q. Okay. Well, if you had this table in front
16 of you at the time that you began prescribing
17 second-generation antipsychotics to Mrs. Turner --

18 A. Uh-huh.

19 Q. -- would you have used Abilify or Geodon
20 rather than Seroquel?

21 A. Not in her case, because her insomnia was
22 the predominant problem we needed to address. And
23 Abilify and Geodon are not good for that.

24 Unfortunately, most tranquilizing drugs,
25 most drugs that calm you make you hungry. That's a