

EXHIBIT C

JOB NO. 93141

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

IN RE: Seroquel Products Liability Litigation

MDL DOCKET NO. 1769

This Document Relates to 6:07-cv-16085

ORAL DEPOSITION OF DEBORAH ELMORE
AUGUST 15, 2007

ORAL DEPOSITION OF DEBORAH ELMORE, produced as a witness at the instance of the Defendants and duly sworn, was taken in the above styled and numbered cause on August 15, 2007, from 9:44 a.m. to 1:47 p.m., before L. RENE WHITE, CSR, CRR, RPR in and for the State of Texas, reported by machine shorthand, at Bailey Perrin Bailey, L.L.P., 440 Louisiana Street, Suite 2100, Houston, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record herein.

1 A. It said that if you have taken Seroquel and
2 other things -- I can't remember what those are --

3 Q. Uh-huh.

4 A. -- and you have gotten diabetes or other
5 things, that to call this number.

6 Q. Okay. When did you see that commercial?

7 A. Couple of years ago.

8 Q. Okay. What did you do next?

9 A. I called the number.

10 Q. And you called. And to whom did you speak?

11 A. I don't remember.

12 Q. What was the nature of the call?

13 A. I wanted to find out about the Seroquel and the
14 diabetes.

15 Q. Okay. And then what happened next?

16 A. They had me send the files from the drugstore
17 for all the -- all the Seroquel that I took and things
18 from my doctor.

19 Q. Okay. So one is you sent some pharmacy
20 records; is that correct?

21 A. Yeah.

22 Q. Documenting your use of Seroquel?

23 A. Yeah.

24 Q. And you sent those to Bailey Perrin Bailey; is
25 that right?

1 A. Yeah.

2 Q. And when you said things from your doctor, what
3 did you mean?

4 A. That -- to say that she gave -- that was giving
5 me Seroquel and then from my doctor that was treating my
6 diabetes.

7 Q. Were these letters or medical records or --

8 A. I don't know.

9 Q. Okay. But you sent those to Bailey Perrin --
10 Bailey Perrin Bailey, also?

11 A. Yeah, they did.

12 Q. The doctors did?

13 A. Yeah.

14 Q. Okay. Did you see what the doctors sent?

15 A. No.

16 Q. Okay. You just asked them to send something
17 here?

18 A. Yeah.

19 Q. Do you know if they did or are you just
20 assuming that they did?

21 A. I'm assuming.

22 Q. Okay.

23 MR. MIZGALA: We haven't seen those
24 documents. I'll request and I'll follow up, but --

25 MS. PRICE: Excellent, because I --

1 MR. MIZGALA: Yes, we'll send a letter,
2 too --

3 MS. PRICE: That's great.

4 MR. MIZGALA: -- for anything else that
5 comes up in the deposition.

6 MS. PRICE: Exactly.

7 MR. MIZGALA: But --

8 MS. PRICE: You need to send a letter for
9 the record.

10 MR. MIZGALA: Yes, we are requesting that
11 those documents be produced.

12 Q. (BY MR. MIZGALA) Okay. So those documents --
13 there's pharmacy records you sent in, the record -- or
14 some documents from the doctors; and those doctors would
15 have been Dr. Dehilein, correct?

16 A. Yes.

17 Q. And was it Dr. McNaughton that you asked to
18 send something?

19 A. Yeah.

20 Q. Okay. So you asked them to send some --
21 something in. Do you -- what is it you asked to have
22 them send in or what were you asked to have them send
23 in?

24 A. To -- just to show that they were treating me.

25 Q. Okay. Did they have to say anything about

1 That's all.

2 Q. Okay. So No. 4 asks for the packaging
3 including the box and label for Seroquel and any
4 remaining medication. And you do have some of that at
5 your home?

6 A. Yes.

7 Q. Okay.

8 MR. MIZGALA: Well, I would ask that it be
9 produced and then we get a copy, please.

10 MS. PRICE: And you will request that from
11 the law firm? You will send --

12 MR. MIZGALA: Yes.

13 MS. PRICE: -- a request?

14 MR. MIZGALA: Yes.

15 Q. (BY MR. MIZGALA) Okay. I want to go back to
16 your current medications for a few minutes here. You
17 said you were taking Celexa; is that correct?

18 A. Yeah.

19 Q. And for what reason do you take Celexa?

20 A. Bipolar.

21 Q. And do you understand Celexa to be an
22 antidepressant?

23 A. Yes.

24 Q. Okay. And have -- you've taken other
25 antidepressants in the past, correct?