

EXHIBIT D

1 93139 eb

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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

4

5 IN RE: SEROQUEL PRODUCTS LIABILITY LITIGATION
MDL DOCKET NO. 1769

6

7 THIS DOCUMENT RELATES TO 6:07-cv-12145

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11

DEPOSITION OF LISA GRANT

12

UPON RECEIPT OF SIGNATURE, THE ORIGINAL OF THIS
DEPOSITION WILL BE IN THE CUSTODY OF:

13

14

Jane Fugate Thorpe, Esquire
Alston & Bird, LLP
One Atlantic Center
1201 West Peachtree Street
Atlanta, Georgia 30309-3424

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18

19

20 Date

Edith A. Boggs, CSR

21

22 8-14-07

HOUSTON, TEXAS

23

24

25

1 Q. Okay. So, Exhibit 2 that you have in front of
2 you is typed, as you can see, right?

3 A. Yes.

4 Q. Did you type it?

5 A. No.

6 Q. Okay. Did you prepare a handwritten version of
7 Exhibit 2 that you gave to somebody?

8 A. Did I prepare it?

9 Q. Yeah. Did you write down answers to those
10 questions that are on the fact sheet?

11 A. Yes.

12 Q. Okay. Do you have a copy of that document?

13 A. At home?

14 Q. Uh-huh. Do you have it at home?

15 A. I'm not sure.

16 Q. Did you give a copy of that document to Danielle
17 or anyone else, the handwritten version of Exhibit 2?

18 A. I'm not sure. I filled out the form and mailed
19 it back.

20 Q. Okay. So, you don't know if you kept a copy?

21 A. Right.

22 MS. THORPE: Okay. We would request a
23 production of the original form filled out. Do you have
24 it, Lezzlie?

25 MS. HORNSBY: I do not.

1 DVDs or anything else about your life with mental
2 illness or diabetes?

3 A. No.

4 Q. Do you have any such things about your Seroquel,
5 taking that medication?

6 A. No.

7 Q. Do you have any records regarding any loss of
8 earnings or earning capacity or your federal tax returns
9 for the last five years?

10 A. In my possession?

11 Q. Yes.

12 A. At home.

13 Q. Do you have tax returns that you filed for the
14 last five years?

15 A. Yes.

16 Q. Do you have copies of them at your house?

17 A. Yes.

18 MS. THORPE: Okay. We would note for the
19 record that we want those things.

20 Q. (BY MS. THORPE) Do you have any other records
21 that reflect your earnings history over the last five
22 years, what you've been paid? I haven't asked you yet
23 about your job but do you have documents relating to
24 work for the last five years at home?

25 A. For work, no.

1 Q. Okay. You don't have any pay stubs or any kind
2 of paper reflecting what you've been paid or earned?

3 A. Disability.

4 Q. Okay. Tell me when you went on disability. Was
5 it 2002?

6 A. 2002.

7 Q. Before 2002 -- for work or jobs that you had
8 before 2002, do you have any documents reflecting your
9 earnings?

10 A. No.

11 Q. Okay. Do you have any employment records in your
12 possession, including employment applications or
13 performance evaluations for any job you've ever held?

14 A. No.

15 Q. Do you have any bills from any physician,
16 pharmacy or other healthcare provider at your home?

17 A. I think so.

18 Q. You think you do?

19 A. Yes.

20 MS. THORPE: Okay. We would ask for copies
21 of those as well.

22 Q. (BY MS. THORPE) Have you had to yourself pay for
23 any healthcare that you've received?

24 A. Yes.

25 Q. Okay. So, you paid Dr. Shaw or Catawba?

1 A. I did sometimes.

2 Q. Okay. Are you paying Dr. Smith?

3 A. No. I'm being billed.

4 Q. Okay. Since 2002 -- I'm just picking a date --
5 well, let me strike that.

6 Since the year 2000, how much money have you
7 yourself paid out for medical care? Do you know?

8 A. No, I don't know.

9 Q. Is it less than a thousand dollars?

10 A. I'm not sure.

11 Q. Is it less than \$5,000?

12 A. Yes.

13 Q. Okay. Do you have any medical records at your
14 house?

15 A. No.

16 Q. Do you have any pharmacy records at your house?

17 A. No.

18 Q. Do you have any packaging or labeling or any
19 other material related to Seroquel at your house?

20 A. No.

21 Q. Do you have any pill bottles of Seroquel at your
22 house?

23 A. Yes.

24 MS. THORPE: Okay. We would ask for that as
25 well.

1 Q. It would range between 72 and 180?

2 A. Yes.

3 Q. How long have you been doing the Accu-Chek?

4 A. I've been doing the Accu-Chek for two years.

5 Q. So, beginning in 2005?

6 A. Yes.

7 Q. Where did you get the equipment to do the

8 Accu-Chek?

9 A. Doctor Diabetic, a mail supply.

10 Q. Anyplace else? Just that one place?

11 A. I had also received one from Spartanburg Medical

12 Center, Spartanburg Hospital. I don't know what it's

13 called.

14 Q. Okay. Any place else?

15 A. Not that I can recall.

16 Q. Okay. And did you write down the results of your

17 Accu-Chek?

18 A. Yes, I logged it. Yes.

19 Q. And where did you write it down?

20 A. Piece of paper when I needed to take it to my

21 doctor.

22 Q. And do you still have those pieces of paper?

23 A. I'm not sure.

24 Q. Could you look at home and let your lawyer know

25 if you still have those pieces of paper?

1 A. Yes.

2 MS. THORPE: Okay. Lezzlie, that's another
3 request.

4 MS. HORNSBY: Got it. I'm keeping a running
5 tab.

6 MS. THORPE: Thank you.

7 Q. (BY MS. THORPE) And so -- so, after you filed
8 the lawsuit in 2006 and after you had been diagnosed
9 with diabetes in 2005, why did you continue to take
10 Seroquel?

11 A. I wasn't sure if it had given me diabetes. My
12 doctor told me it was okay to take it, so, I continued
13 to take it.

14 Q. And Seroquel was helping you with your symptoms;
15 is that right?

16 A. With my bipolar disorder, yes.

17 Q. And what particular symptoms did you feel like
18 Seroquel helped you with?

19 A. I wasn't talking as fast as I used to, and I
20 wasn't having a lot of run-on sentences when I spoke to
21 people, and I felt a lot more calm and relaxed when
22 taking it.

23 Q. Anything else?

24 A. I slept better.

25 Q. Okay. And when you say you slept better and your

1 A. She lived in Rock Hill, South Carolina. I don't
2 know a physical address.

3 Q. Okay. Do you know if she changed names?

4 A. No. Her name is the same.

5 Q. Okay. Where did she work?

6 A. Who?

7 Q. Tashica.

8 A. Where did she work?

9 Q. Yes.

10 A. While we were together, she worked at various
11 temporary agencies doing administrative assistant work.

12 Q. Now, you got married at some point; is that
13 right?

14 A. Yes.

15 Q. And was that 1984?

16 A. Yes.

17 Q. Where did you get married?

18 A. Jamaica, New York.

19 Q. Did you go to the courthouse? How did you --

20 A. I got married in a church.

21 Q. What was the church?

22 A. Amity Baptist Church.

23 Q. Do you have a marriage certificate?

24 A. Yes.

25 MS. THORPE: If we could get that, I would

1 appreciate it.

2 Q. (BY MS. THORPE) What is your -- was your
3 husband's full name?

4 A. Gregory Lewis Grant.

5 Q. And did you get divorced from Gregory Lewis
6 Grant?

7 A. No.

8 Q. Okay. When did you separate from him? You're
9 currently separated, right?

10 A. Yes.

11 Q. When did you separate?

12 A. In January, 1986.

13 Q. Okay. So, you were married for two years? I
14 mean, you're still married but you were living together
15 for two years, right?

16 A. Yes.

17 Q. And do you know where he is now?

18 A. No.

19 Q. Has he supported your children at all?

20 A. No.

21 Q. Between 1986 -- well, before you moved to South
22 Carolina, where did you live?

23 A. I was living at Albany, New York.

24 Q. And where did you live in Albany?

25 A. I had lived with my girlfriend, Avis. I don't

1 Q. Where did you get your GED?

2 A. Brooklyn, New York.

3 Q. How did you do it?

4 A. Went to school.

5 Q. Where did you go to school?

6 A. Training center in Brooklyn, New York.

7 Q. And what was the name of the training center?

8 A. I don't know.

9 Q. Do you have your GED diploma?

10 A. Yes.

11 MS. THORPE: We would like a copy of that.

12 Q. (BY MS. THORPE) And I understand you went to
13 something called BOCES to get your LPN training?

14 A. Yes.

15 Q. And what is BOCES?

16 A. It's the Board of Cooperative Extension Services.
17 It's a place for adults to return -- like continuing
18 education for adults.

19 Q. And where was that located?

20 A. In Albany, New York.

21 Q. And is that college?

22 A. Like a trade school.

23 Q. And you studied nursing; is that right?

24 A. Yes.

25 Q. And what did you -- what kind of courses did you