

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 6:07-cv-10265

DEPOSITION OF SHARON K. FASHNER
(Pages 1 - 310)

Thursday, September 13, 2007
10:18 a.m. - 6:31 p.m.

Hampton Inn & Suites
East Bay Drive
Largo, Florida

Reported By:
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1 A. I would make a list or either take them with
2 me to the hospital.

3 Q. And do you have any of those pieces of
4 paper --

5 A. Not on me. This is what I brought today.

6 Q. No, no, no. Do you have any of those pieces
7 of paper at home?

8 A. Yes, I do.

9 Q. Do you have a file of things related to your
10 health?

11 A. Not exactly.

12 Q. How do you keep that --

13 A. You mean a file as --

14 Q. Let me ask the question. How do you keep
15 materials or papers or lists of medicines or whatever
16 about your health? How are you organized?

17 A. Keeping notes on it?

18 Q. (Moves head up and down.)

19 A. Well, actually it's a little embarrassing, to
20 tell you the truth. I have boxes of information or
21 letters that I keep. I don't have an accordion file
22 that I should put things in. But a lot of the
23 information are bills that I can't pay or whatnot are in
24 boxes. I keep track that way.

25 Q. If you would, do you have -- do you think some

1 of these lists of medicines may be in those boxes?

2 A. A lot of them would be on my counter, to tell
3 you the truth.

4 Q. And what would you expect to be in those boxes
5 that you're describing?

6 A. Just information, bills.

7 Q. What kind of bills?

8 A. A lot of medical bills that I can't pay. I'm
9 on disability, so I have things from social security.
10 Just things I keep open in case I have to go through
11 them to find something, but I haven't had to go through
12 them. So I need to just -- I'm glad you brought that
13 up, because I've been meaning to just put them away and
14 get them out of sight because --

15 Q. How many boxes are there?

16 A. Just about three. I mean, it's not a huge box
17 or anything. But if something comes in, let's say a
18 bill, for instance, or something, I might call the
19 people, explain the difficulties I'm having financially.
20 Financially I'm not doing very well.

21 Q. So let me just ask you, the materials that are
22 on your counter, the information that's on your counter
23 and the information that's in those boxes, I want to
24 request on the record that you not throw them away.

25 MS. THORPE: And I'm going to ask Leslie to

1 A. Right.

2 Q. You have Seroquel at home?

3 A. Uh-huh.

4 Q. You do?

5 A. Yes.

6 Q. As to all of the documents I'm talking about
7 on Schedule A of Exhibit 1, if you have any of this
8 information, do you understand that you cannot throw it
9 away? If you have any of the things that are on this
10 list, I want you to understand this morning that for
11 reasons of this lawsuit you cannot throw them away.

12 A. All right.

13 Q. And I would ask that you --

14 MS. THORPE: And I'll follow up with a letter,
15 but we need the product.

16 MS. HORNSBY: Okay.

17 BY MS. THORPE:

18 Q. So you think you have some of the pills. What
19 are they contained in?

20 A. In a prescription bottle.

21 Q. So it will have the Seroquel prescription on
22 it, the bottle does?

23 A. Yes.

24 Q. Is it one bottle or more than one bottle?

25 A. I believe there's one.

1 journals, slides, videos, DVDs regarding your life after
2 you developed pancreatitis?

3 A. No.

4 Q. Do you have copies of your tax returns?

5 A. Uh-huh, yes.

6 Q. Are they in those boxes?

7 A. No.

8 Q. But you have them at home?

9 A. Yes.

10 Q. And do you have -- when's the last time you
11 worked?

12 A. I worked up until January the 17th of 2003.

13 Q. Okay. Do you have any records of your
14 employment, like pay stubs and that kind of thing, at
15 home?

16 A. I would assume so, and my tax return.

17 Q. Do you have any employment or performance
18 evaluations at home?

19 A. I'm not clearly sure on that.

20 Q. If you do, I mean, as to all of these things,
21 you need to hang on to them. Okay?

22 A. Uh-huh.

23 Q. If you claim any loss from medical expenses,
24 which I take it you do, do you have any copies of bills
25 from the doctors, hospitals, pharmacies or other

1 healthcare providers?

2 A. Repeat that question for me one more time.

3 Q. Do you have any medical bills from hospitals
4 or doctors?

5 A. Yes.

6 Q. And if you -- do you have documents relating
7 to the proceeding in which you were declared disabled by
8 Social Security? Do you have materials related to
9 that?

10 A. From an attorney?

11 Q. Any kind of materials?

12 A. From Social Security or --

13 Q. Social Security, attorneys, anything?

14 A. Yes.

15 Q. You've got paper related to that?

16 A. Yes, uh-huh.

17 Q. Did you hire a lawyer?

18 A. No.

19 Q. So you don't have any correspondence from a
20 lawyer about that?

21 A. No.

22 Q. Do you -- you mentioned you had settled the
23 case about the sexual harassment claims. Do you have
24 papers relating to that case at home?

25 A. Like I said, I cannot disclose any information