

EXHIBIT I

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

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

6 This Document Relates to 6:07-cv-10424
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9 ORAL DEPOSITION

10 JESSE RUNNER

11 August 14, 2007
12

13 ORAL DEPOSITION OF JESSE RUNNER, produced as a
14 witness at the instance of the Defendant and duly
15 sworn, was taken in the above-styled and numbered
16 cause on the 14th day of August, 2007, from 9:54 a.m.
17 to 5:29 p.m., before Shauna Foreman, Certified
18 Shorthand Reporter in and for the State of Texas,
19 reported by computerized stenotype machine at the
20 offices of Bailey Perrin Bailey, 440 Louisiana, Suite
21 2100, Houston, Texas, pursuant to the Federal Rules
22 of Civil Procedure and the provisions stated on the
23 record or attached hereto.
24
25

1 Q. But you do recall writing -- doing a
2 handwritten copy of this and mailing it back to your
3 lawyers?

4 A. Yes.

5 MR. BROWN: Jim, we're just going
6 to -- to the extent it exists, we're going to call
7 for production of the handwritten fact sheet prepared
8 by Mr. Runner.

9 MR. BRUZZESE: Okay.

10 Q. (By Mr. Brown) When you prepared the
11 information, did anyone help you prepare it?

12 A. No.

13 Q. Having looked at it now, is there anything
14 you want to change in Exhibit B, the plaintiff's fact
15 sheet?

16 A. Everything looks -- from what I can see
17 quickly reviewing, it looks pretty much in order.

18 Q. I want to talk to you generally now about
19 the doctors you see. I want you to understand that
20 we'll come back and get more detail later on, but do
21 you have regular doctors you see on a regular basis?

22 A. Yes.

23 Q. How many doctors do you see on a regular
24 basis?

25 A. Maybe three.

1 A. I don't know.

2 Q. Where do you keep copies of your tax
3 returns?

4 A. An attache case.

5 Q. Do you have it at home?

6 A. Yeah.

7 MR. BROWN: I'm going to call for
8 production of the tax records.

9 Q. (By Mr. Brown) How many prior lawsuits
10 have you been involved in?

11 A. I had a car accident.

12 Q. How many car accidents have you had in your
13 life?

14 A. Several.

15 Q. Does six sound about right?

16 A. I don't know. I don't think so. I don't
17 know.

18 Q. Did you have a car accident in 1986?

19 A. I don't know.

20 Q. How many accidents do you think you had
21 during the 1980s?

22 A. I don't know.

23 Q. Were you sued during the 1980s for car
24 accidents you were involved in?

25 A. I was never sued for a car accident. My

1 Q. Does 42,000 sound about right?

2 A. I don't know.

3 Q. Do you know -- do you have any idea how
4 much money you wrote off?

5 A. No.

6 Q. Who was your lawyer in that case?

7 A. Mark -- I don't remember what his last name
8 was.

9 Q. How many times have you filed bankruptcy?

10 A. Once.

11 Q. Did most of the money you owe in 2005, was
12 it mostly credit card debt?

13 A. Credit card for medical.

14 Q. So, those credit card bills --

15 A. -- were for medical.

16 Q. Okay. Are you claiming as part of this
17 lawsuit out-of-pocket expenses that would have been
18 charged to those credit cards?

19 A. I don't know what my attorney is doing.
20 You would have to ask him.

21 MR. BROWN: Jim, brief statement.

22 This is February of '05, as I understand it. To the
23 extent that any of these out-of-pocket expenses claim
24 medical bills accrued to this particular cause of
25 action, we're going to need to see the credit card

1 bills.

2 Q. (By Mr. Brown) Why did you file for
3 bankruptcy?

4 A. Well, the medical bills and things were
5 mounting up, the bills were mounting up, and I could
6 not afford to pay them.

7 Q. Were you still making \$4,000 a month
8 approximately at that time?

9 A. Not at that time, no.

10 Q. How much were you making in 2005,
11 approximately, per month?

12 A. Maybe 3100, 3200.

13 Q. And the \$3100 per month wasn't enough to
14 pay the debt that you had in 2005?

15 A. It was hard, very tight.

16 Q. How much of the money -- what percentage of
17 the money -- by the way, that debt was discharged; is
18 that right?

19 A. Yes.

20 Q. You didn't have to pay it?

21 A. No.

22 Q. How much of the money that you discharged
23 was directly related to medical bills or expenses?

24 A. I couldn't say offhand.

25 Q. Give me an approximation. Was it half,