

EXHIBIT J

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UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF FLORIDA

ORLANDO DIVISION

IN RE: Seroquel Liability Litigation

MDL DOCKET NO. 1769

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Relating to:

Frank Borges V AstraZeneca

Pharmaceuticals LP, et al.,

Case Number: 6:07-cv-00357,

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DEPOSITION OF FRANK C. BORGES

Wednesday, August 29, 2007, 8:50 a.m.

Four Points Sheraton

35 Scudder Avenue

Hyannis, Massachusetts

Reporter: Rosemary F. Grogan, CSR, RPR

1 A. I take more pills than I can even count.

2 Q. That's okay.

3 A. I should have wrote them down and brang them
4 here.

5 MS. CRANFORD: It's okay.

6 BY MS. WHEATON:

7 Q. Really, like I said, it's not a test.

8 What do you take the Haldol for? What
9 condition is that for?

10 A. I don't know. I think it's for -- I'm a
11 schizophrenic. My booklet, my confidential booklet,
12 says, I think, it's more a light case I take for that
13 and hearing things when I'm sleeping. If I don't take
14 the Haldol, I hear things, like people dragging chains
15 down hallways and kids running down schoolways, and
16 little kids playing and stuff; bells ringing and stuff.

17 Q. You said your confidential booklet says you
18 have a light case.

19 What confidential booklet are you talking
20 about?

21 A. Should I have brought it?

22 Q. I don't even know what it is.

23 A. It's confidential, but -- I'm on social
24 security and when I applied for social security, the guy

1 gave me a test, some psychiatrist, said here, put this
2 puzzle together; do this; do that. So I put all the
3 stuff together.

4 So I put the test together and he
5 diagnosed me as -- to put me on social security because
6 of my -- and I told him my problems, and stuff like
7 that. He knows I have psychiatric problems, like
8 schizophrenic.

9 Q. Is the booklet something that has to do with
10 your getting social security disability?

11 A. Yes, I get social security disability; not
12 much, but I get a little bit. I can tell you how much,
13 if you want to ask?

14 Q. Please, how much?

15 A. I get 659 for my big check, and 69 for my
16 small check.

17 Q. Both of those are from social security?

18 A. The small one is S.S.I.

19 Q. And what's the big one?

20 A. The big one is social security, S.S.I.; social
21 security.

22 Q. But I want to figure out what the booklet is.
23 You said there's a booklet.

24 What's that?

1 You said you needed my social security
2 notice, how much I make?

3 Q. We'll want the papers from when you applied
4 for social security disability, and when it was awarded
5 to you, but I'll work with your lawyers.

6 A. I don't think I have that. I threw all of
7 that stuff out.

8 Q. You still have the confidential booklet?

9 A. Yeah, I have that. I have that, yeah, because
10 I thought I would need that to -- for some reason, to
11 show people.

12 Q. We'll work with your attorneys to get that.

13 A. Okay.

14 Q. Have you ever brought any lawsuit other than
15 this one?

16 A. I never done a lawsuit before.

17 Q. So this is the first time?

18 A. It makes you feel like a heel, but the way I
19 feel and the way my life is going, it's horrible this
20 happened. And I figured if it was Seroquel, I should be
21 compensated for it because now I'm not going to have a
22 life now.

23 Q. I know you said you had a computer and you
24 don't go on the Internet and research Seroquel.