

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION**

**IN RE: Seroquel Products Liability Litigation  
MDL DOCKET NO. 1769**

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**This Document Relates to ALL CASES**

**DECLARATION OF RUSSELL STEWART IN SUPPORT OF  
ASTRAZENECA'S RESPONSE TO PLAINTIFFS' MOTION REGARDING  
THE CONFIDENTIALITY OF CERTAIN CASE-SPECIFIC DISCOVERY  
DISCLOSURES AND RELATED MATERIALS**

My name is Russell Stewart, and I declare:

1. I am over the age of eighteen, and I am competent to make this declaration. I provide this declaration based upon my personal knowledge. I would testify as to the facts in this declaration under oath if called upon to do so.
2. I am an attorney with the law firm of Faegre & Benson LLP, attorneys of record for AstraZeneca LP and AstraZeneca Pharmaceuticals LP ("AstraZeneca"). I submit this declaration in conjunction with the litigation captioned above.
3. AstraZeneca's disclosures of available information prepared and served in case-specific discovery in this litigation pertaining to prescribing physician includes: (1) call notes; (2) account payable information; (3) dear doctor/dear healthcare provider letters; (4) prescriber-level IMS Rx data; and (5) professional information requests.

4. AstraZeneca served disclosures of this information for prescribing physicians in the Naramore, Thomas, Coppola, James, Glover and Godfrey cases. The disclosures were marked “confidential” pursuant to paragraph 4(A) of the Protective Order.

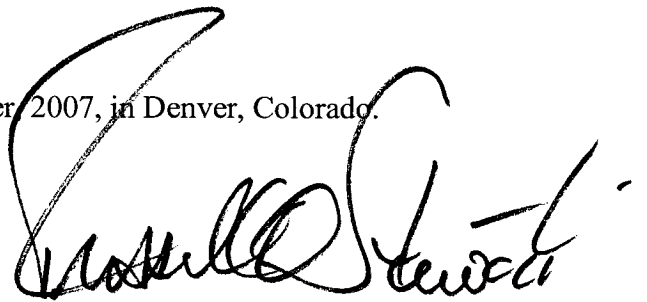
5. On October 17, 2007, Laura Brandenburg sent several e-mails raising challenges to the confidential designations of disclosures for plaintiffs Naramore, Thomas, Coppola, James, Glover and Godfrey. True copies of the six e-mails are attached as Exhibit A.

6. On October 24, 2007, plaintiffs’ counsel sent an e-mail concerning confidential designations. A true copy of the October 24, 2007 e-mail is attached as Exhibit B.

7. On October 29, 2007, AstraZeneca provided a written response to the Plaintiffs’ challenge to the confidential designations. A true copy of the October 29, 2007 letter is attached as Exhibit C.

I declare under penalty of perjury under the laws of the United States of America and the laws of the state of Florida that the foregoing is true and correct to the best of my knowledge.

Signed this 7<sup>th</sup> day of November, 2007, in Denver, Colorado.

A handwritten signature in black ink, appearing to read "Russell Stewart", written over a horizontal line.

Russell Stewart