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July 12, 2007

VIA FACSIMILE & U.S. MAILMichael Pederson, Esq.
Weitz & Luxenberg
180 Maiden Lane
New York, NY 10038Re: In re Seroquel Products Liability Litigation
MDL No. 1759 (M.D. Fla.)

Dear Attorney Pederson:

This firm represents Simpson Healthcare Executives in connection with the subpoena you served on July 3, 2007 in the above-referenced litigation. I am writing, pursuant to Rule 45 of the Federal Rules of Civil Procedure, to serve Simpson Healthcare's preliminary written objections to producing the designated materials and to producing electronically-stored information in the form requested in the subpoena.

Simpson Healthcare objects to the subpoena as a whole because it does not allow reasonable time for compliance. Simpson Healthcare objects to Document Requests 1 through 6 because they are overly broad and because compliance would subject Simpson Healthcare to undue burden.

Simpson Healthcare also objects to the form of production specified in the Subpoena Instructions, and objects to Document Requests 1 through 6 to the extent they incorporate the Subpoena Instructions. To the extent Simpson Healthcare produces electronically-stored information, it is willing to do so in single-page TIFF files, but objects to producing electronically-stored information in its native form or some other searchable form. To the extent Simpson Healthcare produces documents that do not exist in electronic form, it is willing to do so in paper form, but objects to producing such documents in single-page TIFF files with corresponding load files.

Finally, Simpson Healthcare objects to the Deposition upon Written Questions because it fails to satisfy the requirements of Rule 31. For example, it fails to name an officer before whom the deposition is to be taken.

BOSTON

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WOBB



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Please feel free to call me if you would like to discuss Simpson Healthcare's objections in more detail.

Best regards.

Sincerely,



Jennifer M. DelMonico