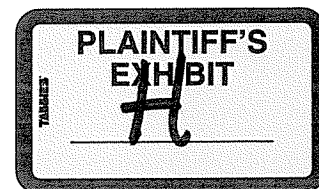


**From:** Holly Wheeler  
**Sent:** Friday, August 10, 2007 4:31 PM  
**To:** 'Kurt S. Kusiak'  
**Cc:** Edward Blizzard  
**Subject:** RE: PAREXEL MMS - Seroquel Subpoena  
Kurt,



Although we do want the manuscripts, we cannot agree to the production of manuscripts only. We also need all communications between PAREXEL and AstraZeneca that relate to the manuscripts, between PAREXEL and physicians recruited to participate in the studies, and between PAREXEL and any journal to which the studies were submitted for publication. We are on a very tight discovery schedule and we do not have time to get these documents on a rolling basis. We plan to start the depositions of AstraZeneca representatives in October and we need these documents before those depositions.

I understand it is PAREXEL's belief that our requests are a fishing expedition. We disagree. Our requests are limited to documents related to Seroquel. As I previously stated, it is difficult to further limit our requests without more information about *all* of the Seroquel projects/programs involving PAREXEL. For this reason, I suggested that PAREXEL present a representative for deposition. This did not appear to be an acceptable solution to you because you indicated there is not one person who could provide this information. I spent a few hours this afternoon searching the millions of pages of documents AstraZeneca has produced so far in this litigation in an effort to identify PAREXEL representatives who may be helpful in this regard. The PAREXEL representatives who appear to have had the most involvement with AstraZeneca and Seroquel are Aruna Seth, Lauren Duby, Claudia Piano, Donna Casparro and Anne Bright. Perhaps they can assist you and your client in more clearly identifying the Seroquel projects/programs involving PAREXEL that do not involve manuscript publication.

I also reviewed documents, communications and other materials suggesting PAREXEL's work on Seroquel went well beyond assisting in the publication of clinical trial manuscripts. Below is a sampling of the documents and other materials created by PAREXEL related to Seroquel that were included in AstraZeneca's production or were referenced in communications between AstraZeneca and PAREXEL:

- (1) Sleep Disorders and Mental Health Slide Kit
- (2) Bipolar Depression Slide Lecture Program
- (3) Seroquel Draft Publication Plans
- (4) Executive Summary, Seroquel Bipolar Disorder International Advisory Board Meeting, Miami, FL, January 7-8, 2004
- (5) Bipolar Execution and Strategy Team (BEST) meeting agendas, minutes, summaries, etc.
- (6) Seroquel U.S. Proposed 2005 Activities
- (7) Primary Care Physician Slide Kit
- (8) PAREXEL Final Honoria Lecture Program Slide
- (9) CATIE-SZ Strategy Planning Workshop Report Action Plan
- (10) ICOSR Gianfrancesco Slide Presentation (antipsychotic related diabetes risk)
- (11) Best in Class Slide Kit

This is merely a sampling of the documents and materials PAREXEL prepared or was involved in preparing that relate to Seroquel. Many of the emails I have reviewed between PAREXEL and AstraZeneca only reference the above items. We do not have all of these documents/materials themselves. We need all documents, communications between PAREXEL and AstraZeneca or between PAREXEL, and other materials that relate to the above projects/programs. If there are other projects/programs related to Seroquel that are not included in the above list, we need those materials as

well.

I hope this information is helpful. I will continue to review the AstraZeneca production as it comes in to try to get more information to you regarding PAREXEL's involvement with AstraZeneca and Seroquel.

As far as the costs go, this is an issue that will need to be addressed with the court. We have issued more than 20 third party subpoenas in this litigation so far. I am not authorized to compensate any third party for the time it will take to comply with the document requests.

Please let me know if you have any further questions or comments.

Holly

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**From:** Kurt S. Kusiak [mailto:ksk@sally-fitch.com]

**Sent:** Thursday, August 09, 2007 5:35 PM

**To:** Holly Wheeler

**Subject:** Re: PAREXEL MMS - Seroquel Subpoena

Holly,

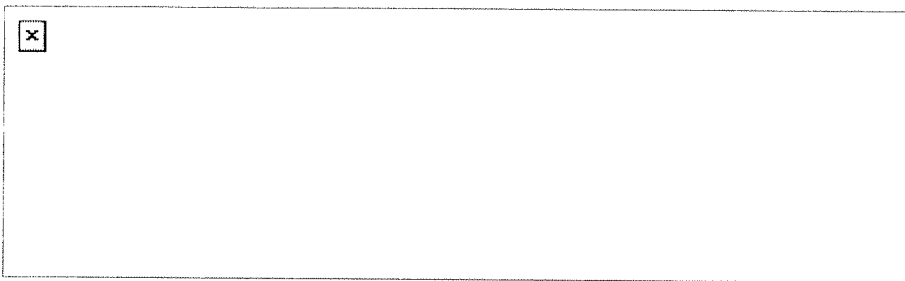
I am unaware of the personal relationship you describe. Even if it did exist, though, I'm not sure how it affects the scope of documents that are relevant to your claims.

If you need emails between the two people involved, we can discuss that. I also don't know what material services PAREXEL provided beyond those related to journal publication. What documents have led you to believe otherwise?

The scope of what you are now asking the people at PAREXEL to review is enormous and will cost them weeks of lost manhours. Paying for copying costs alone will not compensate for the losses you are asking them to incur for what you have conceded is essentially a fishing expedition; i.e. when you issued the subpoena you had little or no knowledge of what service PAREXEL performed for AstraZeneca and no plan or ideas as to what documents you might need to support your claims. PAREXEL is very willing to cooperate in a reasonable way, but you must realize the extent to which complying with what you are asking for will disrupt the company's operations. Perhaps we could agree to give you the manuscripts at this point. If review of the manuscripts leads you to reasonably believe there are other documents worth pursuing, we can proceed from there.

Let me know.

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\* on 8/9/07 6:15 PM, Holly Wheeler at hwheeler@blizzardlaw.com wrote:

Kurt,

It has come to my attention since we spoke on Tuesday that one of Parexel's project managers may have been involved in a personal relationship with AstraZeneca's Medical Director. The MDL court was apparently made aware of this relationship at the last status conference on July 27th and has been asked to perform an *in camera* review of certain documents identified by AstraZeneca related to this issue including emails between the two. You indicated that you had spoken with Ken Friedman about the document subpoena. I'm sure he can also provide you with more information about this issue.

I was not aware that Parexel's main function was to assist in publishing journal articles related to Seroquel. As I explained on the phone, we have a limited understanding of Parexel's involvement with AstraZeneca and Seroquel; however, based on the few documents I have reviewed, it seems apparent that Parexel provided services beyond those just related to journal publication. I agreed to limit our request to documents *and* communications that relate to the use of Seroquel for various indications (approved and off-label) as well as any risks/warnings associated with the drug. Based on this new information, we obviously also need all documents related to any work Parexel did related to any journal publications on Seroquel, as well as any communications between the Parexel project manager and AstraZeneca's Medical Director. If Parexel intends to object to these requests, we will need to address those issues with the court.

We are working with defense counsel to come up with a plan to apportion the reasonable copying costs between the parties. The parties intend to submit a third party discovery plan to the court which will address this issue. I will keep you advised.

Thank you. Please feel free to contact me if you have any questions.

**Holly M. Wheeler**  
440 Louisiana, Suite 1710  
Houston, Texas 77002  
(713) 844-3750  
(713) 844-3755



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**From:** Kurt S. Kusiak [mailto:ksk@sally-fitch.com]  
**Sent:** Thursday, August 09, 2007 3:51 PM  
**To:** Holly Wheeler  
**Subject:** PAREXEL MMS - Seroquel Subpoena

Holly,

I have contacted the people at PAREXEL MMS and discovered that their main function in dealing with AstraZeneca was to help produce journal articles that were published giving the results of Seroquel trials.

Per our agreement regarding the scope of the subpoena, I have asked them to search their files and make copies of all these manuscripts discussing Seroquel, which should give you the information you are looking for. I have also asked them to provide information about the amounts paid by AstraZeneca to PAREXEL MMS for the Seroquel work.

I am told by the people at PAREXEL MMS that this will involve quite a bit of work, since there were many articles and the work goes back at least 5 years. We estimate the cost of producing all of this material to be between \$5,000 and \$10,000, which I assume you will be willing to pay. Please let me know.

