

EXHIBIT K

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF FLORIDA

ORLANDO DIVISION

In Re: Seroquel Products Liability Litigation

MDL Docket No. 1769

DOCUMENT RELATES TO ALL CASES

Case No. 6:06-md-01769-ACC-DAB

**PLAINTIFFS' REQUEST FOR
PRODUCTION OF DOCUMENTS**

Pursuant to F.R.C.P. 34, plaintiffs request that defendants AstraZeneca Pharmaceuticals LP, and AstraZeneca LP and any other responding entities both foreign or domestic, within 30 days after the service of Plaintiffs' Request for Production of Documents, dated on June 26, 2007, serve written responses to the following Plaintiffs' Request for Production of Documents and produce the documents and things herein described at the law offices of Weitz & Luxenberg, 180 Maiden Lane, New York, NY 10038.

INSTRUCTIONS

1. In responding to this Request, you are required to produce all documents known or reasonably available to you, regardless of whether such documents are in your possession, custody, or control or in the possession, custody, or control of your agents, consignees, representatives or investigators, or your attorneys or their agents, employees, representatives, or investigators.

2. If any of the documents or information requested cannot be produced in full, please specify, to the extent possible, the reasons for your inability to produce the remainder, and the approximate date when you expect to produce such documents, if at all. In the event that responsive documents or information requested herein have already been produced, identify the location of such documents by specific Bates Number and identify the previous Custodial Files or other document productions where said documents or information can be found.

3. With respect to any document that has been lost, destroyed, or otherwise disposed of since its preparation or receipt, please provide the following information separately as to each such document:

- (a) A general description of the subject matter, author, recipient(s), date;
- (b) The identity of each person who has received a copy or had an opportunity to receive a copy;
- (c) The last custodian of the document or copies thereof;
- (d) The full particulars or circumstances whereby the document was disposed of, destroyed, or otherwise lost;
- (e) Copies of any document destruction instructions or directives; and
- (f) Copies of any document destruction acknowledgement forms or receipts for the destruction of documents.

4. With respect to any documents that have been deemed privileged or otherwise protected information or materials, you must provide the following information in a written response, designating and identifying those documents or information withheld from production on grounds of privilege:

- (a) The reason for withholding the document or information;
 - (b) A statement of the legal basis for the claim of privilege, work product or other ground for non-disclosure;
 - (c) A brief description of the document, including:
 - a. The date of the document;
 - b. The number of pages, attachments and appendices; and
 - c. The name(s) of its author(s) or preparer(s) and identification by employment and title of each such person.
 - (d) The name of each person who sent, received, was copied on, or had custody of the document, together with an identification of each such person;
 - (e) The present custodian; and,
 - (f) The subject matter of the document, and in the case of any document relating or referring to a meeting or conversation, identification of such meeting or conversation, in sufficient detail to enable the Court to determine the propriety of any claim of privilege.
5. All documents produced in response to this request shall be either:
- (a) Organized and labeled to correspond with the number of the specific demand to which the documents are responsive, or
 - (b) Produced in the order and in the manner that they are kept in the usual course of business.
6. All documents requested shall include all documents and information that relate in whole or in part to the relevant time period, or to events or circumstances during

such relevant time period, even though dated, prepared, generated or received prior to the relevant time period.

7. All documents should be produced in accordance to CMO2 and the agreed upon changes made between the parties on May 30, 2007 .

8. This Notice and Request imposes a continuing obligation upon you. If, after producing documents or information responsive to this request, additional information or documents become available to you, you are required to produce such additional documents or information.

DEFINITIONS

As used herein, the following terms have the following meanings:

1. "Documents" includes documents within the meaning of F.R.C.P. 34 as amended effective December 1, 2006, and particularly includes "electronically stored information."
2. "Related to" and "relating to" means constituting, pertaining to, in connection with, reflecting, respecting, regarding, concerning, referring to, based upon, stating, showing, evidencing, establishing, supporting, negating, contradicting, describing, recording, noting, embodying, memorializing, containing, mentioning, studying, analyzing, discussing, specifying, identifying or in any manner logically, factually, indirectly or directly, or in any other way connecting to the matter addressed in the request, in part of whole.
3. "Communications" means any manner or method in which information is passed from one human being or entity to another including (but not limited to) any written, oral or electronic contact, and/or discussion or exchange of information.

4. "Person" shall include an individual or entity, other than attorneys.
5. "Identify" or "identity" with respect to persons, means to give, to the extent known, the person's full name, present or last known address and phone number, and when referring to a natural person, additionally, the present or last known place of employment.
6. Seroquel" means "the antipsychotic drug quetiapine fumarate, in any form, including (but not limited to) the medication marketed in the United States and sold under the brand name Seroquel, any chemical equivalents, and any predecessor or non-final derivation of the drug marketed by any AstraZeneca entity in foreign countries.
7. "Antipsychotics" means any of the class of drugs or neuroleptics used for the treatment of the symptoms of psychoses including schizophrenia, bipolar mania or disorder, and other similar mental ailments and conditions.
8. "Atypical antipsychotics" means any of the class of drugs approved for the treatment of schizophrenia and Bipolar I that are primarily active on dopamine 2 receptors and ratio of serotonin (5-HT) receptor binding. Included, in this definition are the drugs Seroquel, Abilify (aripiprazole), Clozaril (clozapine), Risperdal (risperidone), Zyprexa (Olanzapine), and Geodon (ziprasidone).
9. "Or" and "and" will be used interchangeably.
10. Unless otherwise indicated, the "relevant period" for the information sought is 1986 to the present.
11. "You," "your," or "Astrazeneca" refers to Defendants Astrazeneca Pharmaceuticals LP and Astrazeneca LP as well as all partners, directors, officers, employees, servants, agents, attorneys, joint ventures, or other representatives, including all corporations and entities affiliated with, Astrazeneca Pharmaceuticals LP, Astrazeneca LP

and any other named Defendants in this lawsuit foreign and domestic. The terms “you” or “your” shall also include all predecessor business entities, as well as any predecessor’s partners, directors, officers, employees, servants, agents, joint ventures or other representatives. The terms “you” or “your” shall also include all foreign subsidiaries or foreign parent companies, as well as any foreign subsidiaries’ or parent companies’ partners, directors, officers, employees, servants, agents, joint ventures or other representatives.

12. “Injuries” shall refer to the development and/or exacerbation of endocrine or metabolic conditions or disorders, including pancreatitis, hyperprolactinemia, weight gain, and any and all diabetes-related symptoms or injuries including (without limitation) diabetes, diabetes mellitus, insulin dependent diabetes mellitus (IDDM), non-insulin dependent diabetes mellitus (NIDDM), type I diabetes, type II diabetes, hyperglycemia, glucose dysregulation, ketoacidosis, diabetic coma, and death.

13. “Warning” shall mean a statement advising plaintiffs and their treating physicians of an association between the use of SEROQUEL and the incidence of injuries.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. All minutes or notes from meetings of the following teams from the time Seroquel was introduced to the market to the present:
 - (a) Abilify Tracking Team
 - (b) AT Keating Team
 - (c) Bipolar Execution and Strategy Team
 - (d) Brand and Portfolio Management Team
 - (e) Commercial Leadership Team
 - (f) Consumer Marketing Team
 - (g) CNS Brand Team
 - (h) CNS Marketing Management Team

- (i) DRAD Labeling Team
- (j) Global Commercial Support Team
- (k) Global Development Leadership Team
- (l) Global Publications Team
- (m) Global Marketing Team
- (n) KOL/Investigator/Speaker (Knowledge Information Systems [KIS])
Newsletter Website Team
- (o) LTC Championship Team
- (p) Managed Care Business Group
- (q) Managed Care Marketing Team
- (r) Managed Markets and Pricing (MMaP) Leadership Team
- (s) Marketing Counsel
- (t) Operations and Portfolio Management Team
- (u) PAP Transition Team
- (v) Product Core Team
- (w) Professional Communications Team
- (x) Promotions Team
- (y) Publications Delivery Team
- (z) Public Relations Team
- (aa) Scientific Commercialization Team
- (bb) Seroquel Brand Team
- (cc) Seroquel Leadership Team
- (dd) Seroquel Value Team
- (ee) State as Customer Account Team
- (ff) State as Consumer Core Team
- (gg) State Market Assessment Steering Committee
- (hh) State Market Assessment Project Team
- (ii) State Strategy Response Team
- (jj) Therapeutic Area Leadership Team
- (kk) U.S. Advisory Board
- (ll) U.S. Communications Team
- (mm) U.S. Development Leadership Team
- (nn) U.S. Product Team
- (oo) Ziprasidone Defense Team

2. All discussion documents and agendas related to Seroquel prepared for the teams listed in Request No. 1.
3. All communications between members of the teams listed in Request No. 1 related to Seroquel from the time Seroquel was introduced to the market to the present.
4. All documents related to all integrated marketing campaigns for Seroquel including, but not limited to:
 - (a) All marketing plans;

- (b) All communications to consumers or doctors, including advertising, press releases, detail pieces (including e-detailing materials), promotional literature, Dear Doctor letters, Q and As, etc.;
 - (c) All testing, including copy testing, persuasion testing, market testing, and focus groups performed to determine or identify key messages to be sent to consumers or doctors;
 - (d) All tracking and message recall studies including, but not limited to, quarterly ATUs (attitudinal research understanding), used to determine the effectiveness of the key messages;
 - (e) All communications with third party vendors including, but not limited to those recognized by Charles Peipher during his June 7, 2007 (Satchi & Satchi Healthcare, ImpactRx, GFK, and Harris Interactive) regarding any aspect of the marketing campaigns; and
 - (f) All Media Plans or documents showing when or where print, radio or television advertising was disseminated.
5. All Mania Dosing Cards for Seroquel.
 6. All Mini Mono Sell Sheets for Seroquel.
 7. All Mood Sell Sheets for Seroquel.
 8. All Seroquel Scorecards.
 9. All Operational Plans that focus on or reference Seroquel.
 10. All Publication Plans for Seroquel.
 11. All Communication Plans for Seroquel.
 12. All Brand Strategic Summaries (BSS) for Seroquel.
 13. All Brand Total Forecasts for Seroquel.
 14. All Therapeutic Area Strategic Plans that focus on or reference Seroquel.
 15. All Target Product Profiles or Target Product Plans (TPP) that focus on or reference Seroquel.
 16. All U.S. and Global Therapeutic Area CNS Strategic Plans from the time Seroquel was introduced to the market to the present.

17. All SWOT (Strength, Weakness, Opportunity, and Threat) analyses for Seroquel.
18. All Seroquel Hotline transcriptions.
19. All corporate organizational charts for the U.S. and non-U.S. business entities that were involved in market research, marketing, and marketing message testing for Seroquel.
20. All Retailer Perspective Audits for Seroquel.
21. The Marketing and Sales Business Policies and Guidelines Manual and any updates thereto from the time Seroquel was introduced to the market to the present.
22. All Antipsychotic Side Effect Checklists for Seroquel.
23. All AstraZeneca University course materials relating to Seroquel from the time Seroquel was introduced to the market to the present.
24. All AstraZeneca Academy course materials, including all web-based virtual training materials, relating to Seroquel from the time Seroquel was introduced to the market to the present.
25. All VA Strategic Plans for Seroquel.
26. All documents and materials related to Project JANUS (State as Customer) including, but not limited to:
 - (a) Results of the 29-state survey/questionnaire referenced, for example, in AZ/SER 3656586;
 - (b) Documents concerning or summarizing State Government Affairs (SGA) manager interviews referenced, for example, in AZ/SER 3656586;
 - (c) "Deep dive" profiles of 29 states referenced, for example, in AZ/SER 3656586;
 - (d) Department of Corrections (DOC), Department of Health (DMH), and Medicaid Toolboxes;
 - (e) Case studies related to the use of the DOC, DMH, and Medicaid Toolboxes;
 - (f) Hospital-Retail Spillover studies;
 - (g) Political Spillover studies or analyses between key state segments;
 - (h) Organizational and Resource Audits;
 - (i) GAP Analysis;
 - (j) The Value-add Brochure and Training Binder and any updates thereto;
 - (k) List of all Advocacy Groups funded by you;

- (l) All contents of the “Current State Customer Toolkit” referenced in AZ/SER 1796064;
 - (m) Spectrum Study referenced, for example, in AZ/SER 1796068; and
 - (n) State profiles, evaluations and surveys referenced, for example, in AZ/SER 3656574.
27. The U.S. Compliance Program Overview referenced in AZ/SER 3743729.
28. The U.S. Communications Team publications booklet referenced in AZ/SER 3743729, and any updates to the booklet, from the time Seroquel was introduced to the market to the present.
29. The following materials referenced in “Growing to be the Best” (AZ/SER 2608245- AZ/SER 2608241:
- (a) Mood Disorder Questionnaire (MDQ), or any other questionnaire provided by you to assist physicians in screening patients for bipolar disorders or any other mental health disorder;
 - (b) Patient Health Questionnaire (PHQ) referenced in AZ/SER 2608246, or any other questionnaire provided by you to assist physicians in screening patients for depression or any other mental health disorder;
 - (c) Understanding Mental Illness: The Big Picture;
 - (d) Open Access Video;
 - (e) Improving Patient Outcomes with Atypical Antipsychotics;
 - (f) Open Access Sell Sheet;
 - (g) Key Facts to Know About Atypicals and the ADA Consensus Statement;
 - (h) Burden of Illness: Bipolar Disorder;
 - (i) HEOR Toolkit slide presentation;
 - (j) Treating Bipolar Disorder: A Counseling Guide flip chart;
 - (k) All COPE guides including (i) Assisting Younger Family Members, (ii) Elder, (iii) Employment, (iv) Family, and (v) Housing;
 - (l) Dialogue for Recovery Dr. Check List;
 - (m) Dialogue for Recovery Patient Brochure;
 - (n) Dialogue for Recovery Physician Sheet;
 - (o) Dialogue for Recovery Caregiver Piece;
 - (p) Dialogue for Recovery Intro. Fact Sheet;
 - (q) Dialogue for Recovery Program Kit;
 - (r) Formulary Kit;
 - (s) Sleep Disorders and Mental Health presentation;
 - (t) Polypharmacy in Mental Illness;
 - (u) Dosing Tool for Seroquel;
 - (v) Seroquel Flashcard;
 - (w) Seroquel Shelf Shouter w/ Managed Care Options;
 - (x) Seroquel Medi-Cal Stickers;
 - (y) Seroquel Medicaid Stickers;
 - (aa) Seroquel (quetiapine fumarate) NEC Label;

- (bb) Seroquel Post Card Mailer w/ Pull-Through Options;
 - (cc) Seroquel Outbound Calling Program;
 - (dd) Adherence Tool Kit;
 - (ee) All materials provided or used in the Bipolar Disease Awareness Education program; and
 - (ff) All materials provided or used in the Atypical Antipsychotics Treatment Guidelines Education program.
30. All materials created or purchased by you which demonstrate the difference in care provided by primary care physicians (PCPs) and psychiatrists, including secondary data reports purchased from third party vendors, and any other materials which address general diagnosis information, prescription habits, and prescribing patterns of PCPs and psychiatrists from the time Seroquel was introduced to the market to the present.
 31. All lists of Speakers on the Speakers Bureau from the time Seroquel was introduced to the market to the present.
 32. All training materials, including web-based materials, provided to, or used in the training of, healthcare professionals for speaker, educational or other related engagements including, but not limited to, Faculty Workshops, Tutorial Programs, Preceptorship Programs, Speaker/Faculty Update Meetings, and Media Training, from the time Seroquel was introduced to the market to the present.
 33. All Seroquel related materials prepared by you and provided to Speakers and Advocates including, but not limited to, visual aids, slide decks, PowerPoint presentations, and toolkits.
 34. All Seroquel related materials distributed to or by Health Care Professionals (HCPs), Speakers and Advocates at any meetings or other events including, but not limited to the following:
 - (a) Advisory Board Meetings;
 - (b) Speakers Consultants Meetings;
 - (c) Roundtable Programs; and
 - (d) Speaker Programs.
 35. All video and audio recordings of Speakers and Advocates for Seroquel.
 36. All documents reflecting payments to Speakers and Advocates for Seroquel.
 37. All Speaker Evaluation forms completed by you or any third party vendor including, but not limited to, Convene Pro and Peer Group, following any Seroquel speaker engagement, referenced in the AstraZeneca Business Policies (IV-44) marked as Exhibit 16 to the June 7, 2007 deposition of Charles Peipher.

38. All newsletters related to Seroquel including, but not limited to, OPMT news flash, Focus on Seroquel, e-newsletters, and Seroquel Publications Information & News (SPIN) from the time Seroquel was introduced to the market to the present.
39. All "CE Enduring Materials" related to Seroquel referenced in the AstraZeneca Business Policies (IV-48-51) marked as Exhibit 16 to the June 7, 2007 deposition of Charles Peipher.
40. All documents including, but not limited to, correspondence (including email), memorandum, notes, reports, and marketing materials relating to the following programs/projects:
 - (a) Brighter Beginnings of Mental Health;
 - (b) Celebration Recovery;
 - (c) AZ Outreach Program;
 - (d) Seroquel Breakthrough Project;
 - (e) Medicare Matters;
 - (f) Mental Health Flag Tour;
 - (g) All "value added" indigent programs; and
 - (h) Seroquel Takes Olanzapine Risperdal Market Share (STORM) program.
41. All business compliance policies utilized by you from the time Seroquel was introduced to the market to the present.
42. All "Call Reports" relating to promotional activities for Seroquel referenced in the AstraZeneca Business Policies (II-22) marked as Exhibit 16 to the June 7, 2007 deposition of Charles Peipher.
43. All expense reports relating to promotional activities for Seroquel referenced for example in the AstraZeneca Business Policies (II-22) marked as Exhibit 16 to the June 7, 2007 deposition of Charles Peipher.
44. All policy information pertaining to Advisory Boards on the AstraZeneca Intranet Policy site referenced in the AstraZeneca Business Policies marked as Exhibit 16 to the June 7, 2007 deposition of Charles Peipher.
45. All materials distributed during "Case Study Programs" for Seroquel referenced in the AstraZeneca Business Policies (IV-36-39) marked as Exhibit 16 to the June 7, 2007 deposition of Charles Peipher.
46. All documents including, but not limited to, agendas, minutes, discussion materials, and communications regarding the Seroquel Town Hall Meetings.

47. All documents including, but not limited to, correspondence (including email), memorandum, notes, and reports pertaining to the formation of the Medical Education & Grants Office (MEGO).
48. All correspondence and documents exchanged between you and the Office of Inspector General regarding your marketing activities and grant programs prior to the formation of MEGO.
49. The Seroquel ISS database referenced, for example, in AZ/SER 3831568.
50. The eSTaR database.
51. All documents including, but not limited to, results, correspondence (including email), memorandum, notes, and reports related to Health Economic & Outcomes Research (HEOR or HECON) studies related to Seroquel.
52. All documents provided to Pharmaceutical Sales Specialists or Professional Sales Specialist (PSS) to assist them in discussing the Seroquel package insert or Dear Doctor letters with physicians.
53. All Seroquel related training materials provided to, or used in the training of, sales representatives.
54. All documents provided to sales representatives in connection with the launch of Seroquel and for any new indications for Seroquel.
55. All obstacle handling materials for Seroquel.
56. All marketing materials for Seroquel submitted to the FDA for approval including, but not limited to, those materials submitted in a Form 2253, and any responsive documents and communications from the FDA.
57. All marketing materials for Seroquel submitted to the FDA for an advisory opinion, and any responsive documents and communications from the FDA.
58. All documents reflecting the amount of money spent by you on the integrated marketing campaigns for Seroquel.
59. All documents related to any CME program sponsored by you for Seroquel.
60. All documents related to the communication of the results of studies sponsored by you for Seroquel.
61. All communications with third party vendors and outside consultants regarding the marketing of Seroquel including, but not limited to, Klemptner, Satchi & Satchi Healthcare, ImpactRx, I3 Innovations, ZS Associates, CME

Inc., Edelman, Towers-Perrin, Complete Medical Communications, FYI Worldwide, Media Managed Care, Market Measures Interactive, GFK, and Harris Interactive.

62. All Dear Doctor/Healthcare Provider letters pertaining to Seroquel that were disseminated in the U.S.

Plaintiffs reserve the right to make additional request for production of documents upon further review of the documents provided and upon completion of depositions of defendants.

Dated: New York, New York
June 26, 2007.

PLAINTIFFS' STEERING COMMITTEE

By: /s/ Paul J. Pennock
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CERTIFICATION OF SERVICE

I HEREBY CERTIFY that on this 26th day of June, 2007, that I e-mailed the foregoing request for production of documents to the Defendants, along with a copy by e-mail to all participants in the CM/ECF system, and that I mailed the foregoing document by First Class Mail to the non-CM/ECF participants listed on the attached service list.

PLAINTIFFS' STEERING COMMITTEE

By: /s/ Paul J. Pennock

Paul J. Pennock

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