EXHIBIT C

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, AstraZeneca LP, AstraZeneca AB, AstraZeneca UK Limited and any entities foreign or domestic within 30 days serve written responses to the following requests for production 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 documnents 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.

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 intructions 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 has sent, shown, or copied on the document, or has had access to or 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 that exist in electronic form are to be produced in electronic form and in their native form or other searchable form, not in an electronic form that is merely a picture of a document such as a TIFF file, a TIF file, or a PDF file. All documents that do not exist in electronic form are to be produced in single page TIFF files with corresponding load files.

8. As to all the materials produced in response to the demands set forth below, the parties are meeting and confering on Wednesday, May 30, 2007 with respect to the nature of the electronic production.

9. 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 and sold under the brand names Seroquel, any chemical equivalents marketed in foreign countries, and any predecessor or non-final derivation of the drug.

7. "Antipyschotics" 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 antipyschotics" 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, Astrazeneca LP, AstraZeneca AB and AstraZeneca UK Limited 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, AstraZeneca AB, and AstraZeneca UK Limited 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 draft protocols, protocols and amendments to the protocols regarding clinical trials involving Seroquel, whether or not such clinical trials involving Seroquel were initiated, completed or are ongoing.

2. The custodial file for Ronald Krall, M.D. (former V.P. for Research and Development and Clinical Development).

3. All communications and drafts of communications between you and the FDA, not already contained within the IND or NDA, regarding any risk or adverse event associated with the use of Seroquel.

4. All communications and drafts of communications of Dear Doctor/Healthcare Provider Letters disseminated to doctors and/or healthcare providers regarding Seroquel, not already contained within the IND and NDA.

5. All documents that were ever in your possession, custody or control related to any risk or adverse event associated with the use of Seroquel which you did not provide to the FDA prior to January 2004, not already contained within the IND and NDA.

6. All documents that were ever in your possession, custody or control related to any risk or adverse event associated with the use of Seroquel which you have not provided to the FDA.

7. All communications and drafts of communications between you and the FDA, not already contained within the IND or NDA, regarding the efficacy of Seroquel.

8. All written comments or recordings of verbal comments received from the FDA regarding a Seroquel Dear Doctor/Healthcare Provider Letter.

9. All drafts and amendments to Dear Doctor/Healthcare Provider Letters pertaining to Seroquel.

10. All patient information sheets regarding Seroquel submitted to the FDA, not already contained within the IND or NDA.

11. All written comments or recordings of verbal comments received from the FDA regarding any and all Seroquel patient information sheets.

12. All drafts and amendments to patient information sheets pertaining to Seroquel.

13. All final patient information sheets regarding Seroquel intended for dissemination to patients.

14. All approved advertising, sales and marketing materials, print and broadcast advertisements, sales aids, visuals, sales scripts, sales guides, reminder pieces and any other materials referenced in 21 C.F.R. 202.1, subdivisions (1)(1) and (1)(2) regarding or relating to Seroquel that was given or communicated to doctors or healthcare providers.

15. All drafts and any amendments to any of the material requested in request 14.

16. All corporate organizational charts that show the legal and business relationship between AstraZeneca PLC and ICI American Holdings and any corporate entities that are related to and/or affiliated with the previously identified companies.

17. All corporate organizational charts for the non-U.S. business entities that were involved in the research and development, regulatory, marketing, production, and sales of Seroquel.

18. A list of all current and past employees who held senior leadership positions from Vice President on up for the non-U.S. business entities who were involved in the research and development, clinical studies, drug safety, regulatory, risk management, marketing, production, and sales of Seroquel from its initial development to the present.

19. All e-mails and internal memorandum from current and former employees within the non-U.S. business entities concerning Seroquel.

20. All e-mails and internal memorandum from current and former employees which represent communications between the non-U.S. business entities and the U.S. business entities concerning Seroquel.

21. All preclinical studies and the underlying data conducted by all non-U.S. business entities concerning Seroquel and/or the development of Seroquel, not yet, provided in the IND or NDA.

22. All clinical trials and the underlying data conducted by all non-U.S. business entities concerning Seroquel, not yet, provided in the IND or NDA.

23. All documents that summarize any completed, proposed, planned, considered or ongoing clinical trials conducted by the non-U.S. business entities that assess the association between Seroquel and diabetes, diabetic ketoacidosis, hypoglycemia, hyperglycemia, elevations of blood glucose, triglycerides, or Hba 1 c, pancreatitis, diabetic coma, diabetes-related deaths, and any other diabetes-related injuries.

24. All documents in your possession, custody, or control comprising or regarding all published and unpublished medical and scientific articles, abstracts, and

research papers created by, authored or written by current or former employees, contract personnel or third parties that were sponsored or paid for by the non-U.S. business entities pertaining to Seroquel.

25. A list of all current and previous Senior Executive Team (SET) members from the date of the merger between Astra AB and Zeneca Group PLC to the present.

26. All SET meeting minutes and/or agenda including video conference recordings and all documents prepared for the participants for such meetings regarding Seroquel, from the date of the merger between Astra AB and Zeneca Group PLC to the present.

27. All documents which relate to materials and agendas prepared for discussion prior to or during the SET members meetings related to Seroquel from the date of the merger between Astra AB and Zeneca Group PLC to the present.

28. All documents and communications between SET members related to Seroquel from the date of the merger between Astra AB and Zeneca Group PLC to the present.

29. A list of all current and previous United States Leadership Team (USLT) members from the teams inception to the present.

30. All documents which relate to meeting minutes and/or agenda of USLT members including video conference recordings and all documents prepared for the participants for such meetings regarding Seroquel, from the teams inception to the present.

31. All documents, materials and agendas prepared for discussion prior to or during the USLT members meetings related to Seroquel.

32. All documents relating to the filing of the patent for Seroquel and any amendments thereto.

33. All patient information sheets intended for dissemination in Japan, the United Kingdom, Australia, Canada, Sweden, and any other foreign country regarding Seroquel and any English translations that exist.

34. All Dear Doctor/Healthcare Provider Letters intended for dissemination in Japan, the United Kingdom, Australia, Canada, Sweden and any other foreign country regarding Seroquel and any English translations that exist.

35. All draft package inserts, patient information sheets, and Dear Doctor/Healthcare Provider letters pertaining to Seroquel that were prepared for any foreign country and any English translations that exist.

36. All documents and drafts of documents related to communications between you and any foreign regulatory agency or authority including but not limited to the European Agency for Medical Products, Medical Products Agency, Sweden, Medicines and Healthcare Products Regulatory Agency, UK and Ministry of Health Labor Welfare regarding any risk or adverse event associated with the use of Seroquel and any English translations that exist.

37. All correspondence to or from any foreign regulatory agency or authority including but not limited to the European Agency for Medical Products, Medical Products Agency, Sweden, Medicines and Healthcare Products Regulatory Agency, UK and Ministry of Health Labor Welfare, Japanese relating to Seroquel and any English translations that exist.

38. All documents in your possession, custody, or control comprising or regarding correspondence with any division of the Department of Health, United Kingdom and Japanese Ministry of Health, Labor, and Welfare pertaining to adverse events, problems, and complications regarding Seroquel, including, but not limited to, adverse event reports and responses thereto.

39. All documents in your possession, custody, or control comprising or regarding correspondence with any division of the Japanese Ministry of Health, Labor, and Welfare pertaining to adverse events, problems, and complications regarding Seroquel, including, but not limited to, adverse event reports and responses thereto and any English translations that exist.

40. All documents in your possession, custody, or control comprising or regarding correspondence with any foreign regulatory agency other than the Japanese Ministry of Health, Labor, and Welfare and the Department of Health, United Kingdom pertaining to adverse events, problems, and complications regarding Seroquel, including, but not limited to, adverse event reports and responses thereto and any English translations that exist.

41. All meeting minutes for all meetings, with any/all domestic and foreign regulatory agencies including but not limited to the European Agency for Medical Products, Medical Products Agency, Sweden, Medicines and Healthcare Products Regulatory Agency, UK, Ministry of Health Labor Welfare, Japan and all English translations that exist regarding:

(a) weight gain

(b) glucose dysregulation

(c) metabolic syndrome

(d) diabetes

(e) contemplated label changes

(f) pancreatitis

42. All documents and any slide or Power Point presentations made or submitted to both foreign and domestic regulatory agencies and government departments including, but limited to the European Agency for Medical Products, Medical Products Agency, Sweden, Medicines and Healthcare Products Regulatory Agency, UK, Ministry of Health Labor Welfare, Japan and the FDA, which is not already contained within the IND and NDA, and all English translations that exist regarding:

(a) weight gain

(b) glucose dysregulation

(c) metabolic syndrome

(d) diabetes

(e) contemplated label changes

(f) pancreatitis

43. All documents that set forth written procedures for the collection, evaluation or dissemination of adverse event reports concerning Seroquel.

44. All electronic databases, electronic spreadsheets, or other electronic programs in your possession, custody, or control concerning or comprising adverse event reports generated in the United Kingdom concerning the use of Seroquel. Responsive materials are to be produced in their native format.

45. All electronic databases, electronic spreadsheets, or other electronic programs in your possession, custody, or control concerning or comprising adverse event

reports generated in Japan concerning the use of Seroquel. Responsive materials are to be produced in their native format.

46. Any electronic database, electronic spreadsheet, or other electronic file or program in your possession, custody, or control concerning or comprising adverse event reports generated worldwide concerning the use of Seroquel. Responsive materials are to be produced in their native format.

47. All documents constituting or summarizing defendants' post marketing adverse event reports for Seroquel.

48. All MedWatch forms and updates that concern or reference Seroquel.

49. All documents in your possession, custody, or control comprising or regarding any communication with journals, authors, or publications about any articles or studies assessing a relationship or association between Seroquel and diabetes, diabetic ketoacidosis, hypoglycemia, hyperglycemia, elevations of blood glucose, triglycerides, or Hba 1 c, pancreatitis, diabetic coma, diabetes-related deaths, and any other diabetes-related injuries.

50. All documents in your possession, custody, or control comprising or regarding all published and unpublished medical and scientific articles, abstracts, and research papers created by, authored or written by current or former employees, contract personnel or third parties that were sponsored or paid for by Defendents pertaining to Seroquel.

51. All documents in your possession, custody or control containing any data or information relating to published studies (whether sponsored or non-sponsored) on Seroquel.

52. All documents in your possession, custody or control containing any data or information relating to unpublished and discontinued studies (whether sponsored or nonsponsored) on Seroquel.

53. All documents relating, referring to or embodying any epidemiological studies relating to Seroquel and the actual or possible effects of such drugs on humans.

54. All documents that summarize any completed, proposed, planned, considered or ongoing clinical trials that assess the association between Seroquel and diabetes, diabetic ketoacidosis, hypoglycemia, hyperglycemia, elevations of blood glucose, triglycerides, or Hba l c, pancreatitis, diabetic coma, diabetes-related deaths, and any other diabetes-related injuries.

55. All documents in your possession, custody or control related to pre-clinical testing conducted on Seroquel or similar derivatives or compounds during studies, including all data concerning animal studies, in vitro studies, competitive studies, scientific studies, head-to-head studies, same assay studies, parallel studies, and double blind studies.

56. All documents in your possession, custody, or control comprising or regarding your internal communications pertaining to Seroquel and its causal connection or association with diabetes, diabetic ketoacidosis, hypoglycemia, hyperglycemia, elevations of blood glucose, triglycerides, or Hba 1 c, pancreatitis, diabetic coma, diabetes-related deaths, and any other diabetes-related injuries.

57. All documents in your possession, custody, or control comprising or regarding your internal communications pertaining to Seroquel and the need for physician monitoring and/or testing to prevent the on-set or exacerbation of diabetes, diabetic ketoacidosis, hypoglycemia, hyperglycemia, elevations of blood glucose, triglycerides, or Hba 1 c, pancreatitis, diabetic coma, diabetes-related deaths, and any other diabetes-related injuries.

58. All documents in your possession, custody, or control that were provided to physicians or other treating physicians that were intended for distribution to doctor's or healthcare providers concerning the risk of Seroquel causing or being associated with diabetes, diabetic ketoacidosis, hypoglycemia, hyperglycemia, elevations of blood

glucose, triglycerides, or Hba l c, pancreatitis, diabetic coma, diabetes-related deaths, and any other diabetes-related injuries, including, but not limited to, approved informed consent forms.

59. All documents in your possession, custody, or control constituting minutes and agendas from meetings, summaries of the minutes of such meetings, or summaries of such meetings with any and all physicians and investigators involved with clinical and pre-clinical trials for Seroquel.

60. All documents in your possession, custody, or control from physicians and investigators concerning all Seroquel clinical or pre-clinical trials provided to you, whether provided to the FDA or not.

61. All documents in your possession, custody, or control intended to be provided to prescribing physicians regarding Seroquel and its intended use, contraindications, potential complications, dosage, and potential need for patient monitoring and/or testing.

62. All documents in your possession, custody or control regarding any post marketing (including Phase IV) studies, seeding studies, cohort studies, case control studies, randomized studies, protocols, or surveillance conducted in the United States and worldwide pertaining to Seroquel.

63. All documents in your possession, custody, or control comprising or regarding the retention and/or use of any third-parties who have analyzed or re-analyzed Seroquel and its causal connection or association with diabetes, diabetic ketoacidosis, hypoglycemia, hyperglycemia, elevations of blood glucose, triglycerides, or Hba 1 c, pancreatitis, diabetic coma, diabetes-related deaths, and any other diabetes-related injuries.

64. All documents in your possession, custody, or control relating to any SOP and policy and procedure manuals relating to the content and format of package inserts,

patient information sheets, and other information pertaining to or concerning Seroquel from 1996 to the present that were intended for physicians and patients.

65. All documents in your possession, custody, or control comprising or regarding your internal communications pertaining to Seroquel and any label changes and/or the decision whether to send Dear Doctor/Healthcare Provider Letters.

66. All documents which constitute evidence or relate to studies performed by third parties related to risks or adverse events associated with the use of Seroquel.

67. All documents which constitute evidence or relate to studies performed by third parties related to the efficacy of Seroquel.

68. All documents which constitute evidence or relate to consensus statements relevant to Seroquel.

69. All documents in your possession, custody, or control comprising or regarding communications to and from your sales force or detail persons who interacted with doctors or healthcare providers pertaining to Seroquel.

70. All documents that identify doctors and healthcare providers who receive payment from defendants for preparing articles or presentations regarding Seroquel that were given or communicated to doctors and healthcare providers.

71. All documents in your possession, custody, or control comprising or regarding compensation, honoraria, grants, scholarships, or gifts, offered or paid, to individuals or institutions for work associated with Seroquel, including, but not limited to, the promotion, marketing, research, pre-clinical and clinical trial investigation, and the authorship of articles related to or concerning Seroquel.

72. All documents in your possession, custody, or control comprising or regarding any committee, task force, or similar group you created or participated in to address or handle questions or concerns related to the association or causal connection between Seroquel and diabetes, diabetic ketoacidosis, hypoglycemia, hyperglycemia, elevations of blood glucose, triglycerides, or Hba 1 c, pancreatitis, diabetic coma, diabetes-related deaths, and any other diabetes-related injuries.

73. All documents in your possession, custody, or control, including, but not limited to, any agenda meeting minutes or summaries of meetings or meeting minutes, executive summaries, transcripts and videos pertaining to any Seroquel diabetes advisory group.

74. All documents produced by you during the course of all United States Attorney investigations related to Seroquel.

75. All documents in your possession related to any research or clinical trials in which Dr. Richard Borison had any involvement.

76. All documents in your possession related to any research or clinical trials in which Bruce Diamond had any involvement.

77. All documents in your possession related to any research or clinical trials in which Eric Poehlman had any involvement.

78. All documents in your possession related to any research or clinical trials in which Walter DeNino had any involvement.

79. All documents which relate to materials, agendas meeting minutes, summaries of meetings or meeting minutes, executive summaries, transcripts and videos prepared for Seroquel National, Regional and Specialty Advisory Board Meetings.

80. All documents which relate to Seroquel speaker training and peer

marketing.

81. All documents which constitute evidence or relate to qualitative or quantitative marketing surveys of doctors and/or patients related to Seroquel.

82. All video or audio recordings or transcripts related to any Seroquel launch meetings.

83. All video or audio recordings or transcripts related to any Seroquel sales meetings.

84. All documents which relate to Seroquel Product Strategic Plans from 1996 to date.

85. All documents and drafts of documents which constitute evidence or relate to "Standby Statements" related to Seroquel.

86. All documents which identify Seroquel "Speakers Bureau" or "Thought Leaders."

87. All documents and drafts of documents which constitute evidence or relate to the Seroquel "Global Label."

88. All documents and drafts of documents which constitute evidence or relate to the Seroquel "Publication Plan."

89. All documents which relate to CME programs sponsored by Defendants addressing the use of Seroquel.

90. All documents which relate to the use of Seroquel other than in the treatment of adult patients suffering from schizophrenia or bipolar mania.

91. All documents in your possession, custody, or control comprising or regarding your internal communications pertaining to Seroquel and any label changes and/or the decision whether to send Dear Doctor/Healthcare Provider Letters.

92. All blood test results, charts, graphs and databases relating to Defendant's use of QUICKI in their studies.

93. All communication whether drafts, final documents or amended documents submitted to any regulatory agency regarding whether the "Core Data Sheet" (CDS) should or should not be revised.

94. All draft protocols, protocols, and amendments to protocols related to Study 125.

95. All documents, drafts and any amendments to the Statistical Analysis Plan for Study 125.

96. All e-mails, and both internal and external communications regarding protocols to Study 125.

97. All drafts and amendments to the clinical study report of Study 125.

98. All underlying documents and communications for Study 125.

99. All case report forms relating to the adverse events as referenced in Defendants Discussion Document (AZSER4302750) on Seroquel.

100. All records for the 117 weight gain reports referenced to Seroquel in discussion document (AZSER2258529).

101. A complete inventory listing the Case Report Forms that the Defendants, Iron Mountain or any other entity under the control of Defendants has stored / archived with respect to all Seroquel related clinical trials sponsored by the Defendants.

102. A complete inventory listing the Case Report Forms that the Defendants, Iron Mountain or any other entity under the control of Defendants has stored / archived with respect to all Seroquel related clinical trials conducted under the Investigator Sponsored Study (ISS) program.

103. All "Keep Under Review" lists for Seroquel from the time Seroquel was introduced to the market to the present.

104. All Patient Risk Management Plans (PRMP) for Seroquel, or similar documents, from the time Seroquel was introduced to the market to the present.

105. All minutes from the Safety Evaluation and Review Meetings (SERM) and Pre-SERM meetings for Seroquel from the time Seroquel was introduced to the market to the present.

106. All discussion documents and agendas prepared for the Safety Evaluation and Review Meetings (SERM) and Pre-SERM meetings for Seroquel as described in the Patient Risk Management Plan (PRMP) (AZ/SER 3783050 – AZ/SER3783104) and Overview of Drug Safety (AZ/SER 0491060 – AZ/SER 0491069) from the time Seroquel was introduced to the market to the present.

107. All Justification Documents concerning Seroquel label changes prepared from the time Seroquel was introduced to the market to the present.

108. All Justification Documents concerning changes to the Seroquel Core Data Sheets (CDS) prepared from the time Seroquel was introduced to the market to the present.

109. All Position Papers concerning any safety or efficacy topic related to Seroquel prepared from the time Seroquel was introduced to the market to the present.

110. All Standard Operating Procedures (SOP) concerning pharmacovigilance and safety surveillance utilized by you from the time Seroquel was introduced to the market to the present.

111. All "Working Instructions" related to pharmacovigilance and safety surveillance utilized by you from the time Seroquel was introduced to the market to the present.

112. All reports concerning whether Standard Operating Procedures (SOP) related to pharmacovigilance and safety surveillance were complied with by you from the time Seroquel was introduced to the market to the present.

113. All Periodic Safety Update Reports (PSUR) for Seroquel from the time Seroquel was introduced to the market to the present.

114. All regulatory authority queries and any responses to regulatory authority queries as referenced in Overview of Drug Safety (AZ/SER 0491068-AZ/SER 0491069) regarding Seroquel from the time Seroquel was introduced to the market to the present.

115. All marketing company queries and responses to marketing company queries as referenced in Overview of Drug Safety (AZ/SER 0491068-AZ/SER 0491069) regarding Seroquel from the time Seroquel was introduced to the market to the present.

116. All reports of adverse events (AE), serious adverse events (SEA), adverse drug reactions (ADR), or Serious Unexpected Suspected Adverse Reactions (SUSAR) received by you concerning Seroquel.

117. All reports provided by you to the FDA, concerned member state authorities, or concerned ethics committees regarding adverse events (AE), serious adverse events (SEA), adverse drug reactions (ADR), or Serious Unexpected Suspected Adverse Reactions (SUSAR) for Seroquel from the time Seroquel was introduced to the market to the present. This request includes, but is not limited to, weekly listings of

SUSAR as referenced in the Patient Risk Management Plan (PRMP) for Seroquel (AZ/SER 3783076).

118. All laboratory abnormalities reflecting hyperglycemia and glycemic dysregulation reported to or by you in connection with Seroquel from the time Seroquel was introduced to the market to the present.

119. All Annual Safety Reports for Seroquel from the time Seroquel was introduced to the market to the present.

120. All Line Listings (LL), including Quarterly Line Listings (QLL), for Seroquel from the time Seroquel was introduced to the market to the present.

121. All quarterly reports prepared by Drug Safety Compliance, Support & Systems for Seroquel from the time Seroquel was introduced to the market to the present.

122. All documents describing the MedRa coding system, including the MedRa dictionary, from the time Seroquel was introduced to the market to the present.

123. All Investigative Brochures and Investigator Brochure updates for Seroquel from the time Seroquel was introduced to the market to the present.

124. All Core Data Sheets and Core Data Sheet updates for Seroquel from the time Seroquel was introduced to the market to the present.

125. All Good Clinical Practices utilized by you for Seroquel as referenced in the Patient Risk Management Plan (PRMP) for Seroquel (AZ/SER 3783077) from the time Seroquel was introduced to the market to the present.

126. All informed consent forms signed by patients prior to participating in any clinical trials involving Seroquel.

127. All materials prepared by or for Barry Arnold for all seminars, conferences and presentations on the subject of pharmacovigilance and safety surveillance from the time Seroquel was introduced to the market to the present.

128. All company clinical comments generated by you in connection with any Global Drug Safety Physician's (GDSP) review of reports for Seroquel with a fatal outcome, reports assessed as life threatening, and reports of topics that are classified as "Keep Under Review Topics," from the time Seroquel was introduced to the market to the present.

129. All minutes of meetings of Benefit/Risk Team for Seroquel from the time Seroquel was introduced to the market to the present.

130. All materials and agendas prepared for discussion prior to or during the meetings of Benefit/Risk Team for Seroquel from the time Seroquel was introduced to the market to the present.

131. All communications between members of the Benefit/Risk Team for Seroquel related to team issues from the time Seroquel was introduced to the market to the present.

132. All communications between attendees of the Safety Evaluation and Review Meetings (SERM) and Pre-SERM meetings related to safety issues concerning Seroquel from the time Seroquel was introduced to the market to the present

133. All Pharmacovigilance plans for Seroquel.

134. All minutes or notes of meetings of the Regulatory Core Team.

135. All minutes or notes of meetings of the Regulatory Project Team for Seroquel.

136. All minutes or notes of meetings of the Defense Team for Seroquel.

137. All minutes or notes of meetings of the Labeling Team for Seroquel.

138. All minutes or notes of meetings of the Executive Approved Team for Seroquel.

139. All Agency Contacts (FDA) for Seroquel, not yet provided in the IND or NDA.

140. All notes regarding contacts with any foreign regulatory authority about Seroquel.

141. All Risk Opportunity Logs for Seroquel.

142. All Regulatory Risk Assessments for Seroquel.

143. All warning letters from DDMAC, all responses to such letters and all follow-up responses from the FDA, not yet provided in the IND or NDA.

144. All documents related to "Seroquel Stride."

145. All documents related to "CNS Newsflash."

146. All documents related to "Seroquel Highlights."

147. All documents related to "Manager's Briefs."

148. All copies of the UK Marketing Authorization Application for Seroquel.

149. All drafts and amendments to Seroquel Product Strategic Plans as referenced to "Product Strategic Plans For Seroquel" (AZSER0589524) from 1996 to the present.

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
May 25, 2007.

PLAINTIFFS' STEERING COMMITTEE

By: /s/ Paul J. Pennock

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CERTIFICATION OF SERVICE

I HEREBY CERTIFY that on this 25th day of May, 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 Federal Express to the non-CM/ECF participants listed on the attached service list.

PLAINTIFFS' STEERING COMMITTEE

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