

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

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	:	Case No.
IN RE: SEROQUEL PRODUCTS	:	6:06-MD-1769-ORL-ACC-22DAB
LIABILITY LITIGATION	:	
	:	
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	:	
THIS RELATES TO ALL CASES	:	
	:	
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**ASTRAZENECA PHARMACEUTICALS LP'S AND ASTRAZENECA LP'S NOTICE  
OF FILING**

Plaintiffs have served subpoenas on Planet Data Solutions, Inc. (hereinafter, "Planet Data") issued from the United States District Court for the Southern District of New York, and on Zantaz, Inc. (hereinafter, "Zantaz") issued from the United States District Court for the Northern District of California. Planet Data and Zantaz are both litigation support firms that assisted AstraZeneca Pharmaceuticals LP and AstraZeneca LP (hereinafter, "the AstraZeneca Defendants") with the production of electronically stored information ("ESI"). The subpoenas seek discovery into the litigation support work performed by these firms, apparently in connection with the sanctions hearing set for January 28, 2008.

In response, the AstraZeneca Defendants filed papers in the Southern District of New York and the Northern District of California to refer the matters to this Court for resolution or, in the alternative, to quash the subpoenas or issue protective orders. In their papers, the AstraZeneca Defendants noted that referral of these matters to this Court is unopposed by Plaintiffs.

This Court has indicated in status hearings that it will encourage other courts facing discovery motions relating to the Seroquel litigation to send them to the MDL for resolution. In addition, this Court has set a hearing on December 18, 2007 to specifically consider concerns relating to the discovery at issue here. *See* Order of November 20, 2007 Doc. No. 706 (“Matters as to . . . possible discovery needed for preparing for the Hearing [on sanctions issues] will be considered at the next Status Conference”).

Accordingly, in connection with the December 18, 2007 hearing, the AstraZeneca Defendants, by and through its undersigned counsel, hereby give Notice of Filing the following:

1. The AstraZeneca Defendants’ Notice of Motion to Refer Matter to Underlying MDL Court (Which Relief is Unopposed) or, in the Alternative, to Quash Subpoenas or Issue Protective Order filed in Miscellaneous Action No. M8-85 in the United States District Court for the Southern District of New York (Exhibit 1).

2. The AstraZeneca Defendants’ Memorandum of Law in Support of Motion to Refer Matter to Underlying MDL Court (Which Relief is Unopposed) or, in the Alternative, to Quash Subpoenas or Issue Protective Order filed in Miscellaneous Action No. M8-85 in the United States District Court for the Southern District of New York (Exhibit 2).

3. The Declaration of Robert L. Ciotti in Support of the AstraZeneca Defendants’ Motion to Refer Matter to Underlying MDL Court (Which Relief is Unopposed) or, in the Alternative, to Quash Subpoenas or Issue Protective Order filed in Miscellaneous Action No. M8-85 in the United States District Court for the Southern District of New York (Exhibit 3).

4. The AstraZeneca Defendants Notice of Motion and Motion to Refer Matter to Underlying MDL Court (Which Relief is Unopposed) or, in the Alternative, to Quash Subpoenas

or Issue Protective Order filed in the Miscellaneous Action in the United States District Court for the Northern District of California (Exhibit 4).

5. The Declaration of Chris S. Coutroulis in Support of Defendants' Notice of Motion and Motion to Refer Matter to Underlying MDL Court (Which Relief is Unopposed) or, in the Alternative, to Quash Subpoenas or Issue Protective Order filed in the Miscellaneous Action in the United States District Court for the Northern District of California (Exhibit 5).

6. The AstraZeneca Defendants' Proposed Order granting Motion to Refer Matter to the MDL filed in the Miscellaneous Action in the United States District Court for the Northern District of California (Exhibit 6).

7. A proof of service filed in the Miscellaneous Action in the United States District Court for the Northern District of California (Exhibit 7).

Dated: December 13, 2007

Respectfully submitted,

s/ Chris S. Coutroulis  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on the 13th of December, 2007, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I further certify that the foregoing document and the notice of electronic filing was served on Plaintiffs' Liaison Counsel in accordance with CMO No. 1.

s/ Chris S. Coutroulis  
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**SERVICE LIST**

**In Re: Seroquel Products Liability Litigation  
MDL Docket No. 1769**

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