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Larry Gornick, Esquire
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44 Montgomery Street, 36th floor
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Dear Larry:

This letter responds to Mr. Jaffe's email below.

As you know, we made the following agreement in New York with respect to Planet: "AstraZeneca will produce, without redaction, all Seroquel-related content (i.e. article abstracts, metadata and comments)."

AstraZeneca has honored this agreement, and produced the Seroquel-related content in the exact format in which it is extractable by AstraZeneca employees (which is more than what Rule 34 requires). Consistent with our agreement, with AstraZeneca's guidance, FTI extracted the Seroquel-related content from PLANET in its native format, based on search terms provided by AstraZeneca personnel in order to capture all of the Seroquel-related content. FTI searched using the front-end of Planet, which is what is available to all AstraZeneca business users. We extracted and produced data in the exact way that AstraZeneca analysts query and extract the data. That is, the text files that were produced are what AstraZeneca employees receive when they query this database. These files are text searchable. Extracts also include the "AZ Comments" field.

Contrary to Mr. Jaffe's assertion, PLANET does not produce results in XML by default; nor did we agree to produce the PLANET database in XML. Results from the front-end extraction tool that are available to AstraZeneca's employees are either in the format of Word or ASCII.
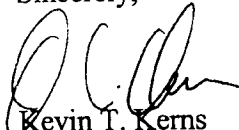
Mr. Jaffe also raises an issue regarding the number of fields included in the extract. To prepare the data extracts, FTI selected all possible fields from the Planet front-end interface. There was a maximum of 64 fields that were able to be selected, and FTI selected all of these fields. Using the Seroquel search criteria, all of the 'hits' resulted and those results were exported to

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ASCII unformatted text files. If a data field had a null value for a particular record, then that field was not populated in the text results because there was no value to report. That is a function of PLANET and not a modification in FTI's data production.

In the interest of getting you this production as soon as possible, only the front-end extraction tool was utilized to search the database for Seroquel-related information. FTI is still in the process of obtaining an exact replication of the SQL back-end database that has all data tables, including those tables that may not contain Seroquel-related content. Although our production of PLANET is more than reasonable and sufficient, if there are additional populated fields that contain Seroquel content from the back end, we will produce them. If there is such content, Plaintiffs will have received *more* than that which is available to AstraZeneca business users.

Larry, going forward we hope that we can discuss these types of issues less formally. PLANET is a very straightforward database, yet Mr. Jaffe sent me an email of five printed pages regarding our production. Please call me next time there is an issue, and hopefully we can resolve any issues before email and letter writing becomes necessary.

Sincerely,

Kevin T. Kerns

KTK/dt