

Decker, Brian

From: craigball@gmail.com on behalf of Craig Ball [craig@ball.net]
Sent: Wednesday, December 12, 2007 11:58 AM
To: Adupre@mccarter.com
Cc: lgornick@lsg-law.com; dcanty@lsg-law.com; Jaffe, Jonathan; Jim Freebery; rpass@carltonfields.com; cfield@daylightforensic.com; Bill.Adams@fticonsulting.com; Kerns, Kevin; McConnell, Stephen
Subject: Re: SEROQUEL: Certain Database Agreements from NY Conference
Attachments: SEROQUEL_Database Agreements_1.pdf

Ladies and Gentlemen:

I herewith transmit a document detailing the agreements reached at the New York meeting last week. Please promptly advise if you have any objection to my renditions; else, these will be the terms of the agreements that bind the parties respecting these databases.

Craig Ball

On Dec 12, 2007 10:18 AM, Dupre, Andrew <ADupre@mccarter.com> wrote:

Hello all:

Bob has invited us to use his number for the 12:00 EDT call today. Best-
Call in number: 888 839 7356 Passcode: 850 513 3608

Andrew S. Dupre, Esq.
McCarter & English, LLP
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12/28/2007

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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

IN RE: Seroquel Products Liability
Litigation

Case No. 6:06-md-1769-Orl-22DAB

This Document Relates to ALL CASES

Agreements Respecting Scope and Form of Production for Certain AstraZeneca Databases
Concluded During Mediated Conferences between the Parties in NYC on December 4-5, 2007

Narrative Defining Obligation **Text on Flip Chart at 12/4-5/07 Conference**

Sales Insite

AstraZeneca will produce all Seroquel-related content in native forms (as maintained) with tables and metadata produced in XML

Sales Insite
Will Produce All Seroquel-Related
CONTENT IN NATIVE FORMS (AS
MAINTAINED) WITH TABLES &
METADATA produced IN XML

Viewpoint

AstraZeneca will produce all Seroquel-related content in native forms (as maintained) with tables and metadata produced in XML

Sales Insite
Will Produce All Seroquel-Related
CONTENT IN NATIVE FORMS (AS
MAINTAINED) WITH TABLES &
METADATA produced IN XML

Viewpoint
SAME AS ABOVE FOR
ALL SEROQUEL-RELATED DATA
IN THIS DATABASE

Seroquel Lifecycle Scientific Database

Astra Zeneca will produce the complete contents in native format without redaction. AstraZeneca will additionally produce in native format, with metadata and without redaction, all documents linked to from within the spreadsheet.

SEROQUEL LIFECYCLE SCIENTIFIC DATABASE
Will Produce Complete CONTENTS IN
NATIVE FORMAT W/O REDACTION
PLUS All Documents Linked w/i
The Spreadsheet, ALSO IN NATIVE
FORMAT, UNREDACTED WITH METADATA.

Planet

AstraZeneca will produce, without redaction, all Seroquel-related content (i.e., article abstracts, metadata and comments).

PLANET
AZ will produce Complete, Unredacted
SEROQUEL-related CONTENT
(i.e. ARTICLE ABSTRACTS,
METADATA & COMMENTS)

Webstir

Without affecting objections, duties and agreements attendant to Case Specific Discovery, and without objections, duties and agreements in Case Specific Discovery affecting this agreement, AstraZeneca shall produce all Seroquel-related professional inquiry requests (PIRs) and all standard responses in native format. AstraZeneca shall further produce the complete Paris_Inquiry table in XML (including the standard response coding identifier). Voluntary reporting physician identifiers may be redacted from reports flagged as adverse event reports.

WebSTIR
WITHOUT AFFECTING OBJECTIONS, DUTIES AND
AGREEMENTS ATTENDANT TO CASE SPECIFIC DISCOVERY
(AND VICE-VERSA), AZ SHALL PRODUCE ALL SEROQUEL-
RELATED PROFESSIONAL INQUIRY REQUESTS (PIRS)
AND ALL STANDARD RESPONSES IN NATIVE FORMAT.
AZ SHALL FURTHER PRODUCE THE COMPLETE
PARIS_Inquiry Table IN ~~XML~~ XML
(INCLUDING THE STANDARD RESPONSE
CODING IDENTIFIER). VOLUNTARY
REPORTING PHYSICIAN IDENTIFIERS
MAY REDACTED FROM REPORTS
FLAGGED AS ADVERSE EVENT REPORTS.

Clintrace

- 1) AstraZeneca will identify fields and tables that are not reflected in the 2.10 Reference Guide.
- 2) Mr. Draper will detail table relationships for plaintiffs' technical staff via a written response.
- 3) AstraZeneca will produce the query or queries to be used to generate responsive material from the database.
- 4) AstraZeneca intends to redact certain privileged data and will produce the data after redaction as XML formatted information.

SAM

- 1) Within ten (10) business days after production of the Clintrace production (in the manner described above, and to be complete by January 2, 2008), Plaintiffs may designate up to five hundred (500) SAM records by their corresponding Clintrace identifiers and AstraZeneca shall produce these designated records to Plaintiffs within ten (10) business days.
- 2) AstraZeneca has announced its intention to redact from these SAM records the information that identifies the patient, voluntary reporter and other AstraZeneca drug identifiers and Plaintiffs reserve all rights to contest such redaction.
- 3) If Plaintiffs establish to the satisfaction of the Special Master for ESI that the SAM records establish a material and relevant pattern of omission or mischaracterization, the Special Master may direct AstraZeneca to furnish another five hundred (500) SAM records for production to Plaintiffs within ten (10) business days of such designation. Plaintiffs agree to conclude their demands for SAM records by receipt of a total of one thousand (1,000) such records.

Clintrace

- 1) ID Fields/tables NOT reflected in the 2.10 REFERENCE GUIDE
- 1a) DD to Detail Table Relationships - (written response)
- 2) PRODUCE Query/ies USED TO GENERATE RESPONSE
- 3) REDACT & PRODUCE REDACTED DATA AS XML

Clintrace

- 1) ID Fields/tables NOT reflected in the 2.10 REFERENCE GUIDE
- 1a) DD to Detail Table Relationships - (written response)
- 2) PRODUCE Query/ies USED TO GENERATE RESPONSE
- 3) REDACT & PRODUCE REDACTED DATA AS XML

SAM

- 1) W/i 10 Biz Days AFTER Clintrace Production (Per Above) (by Clintrace IDs)
- 2) IT To Designate up to 500 SAM RECORDS FOR PRODUCTION AND WHICH SHALL BE PRODUCED WITHIN 10 Biz Days
w/ REDACTION OF PATIENT, Voluntary Reporter & OTHER AZ Drug DATA IDENTIFIERS. IT'S RESERVE ALL RIGHTS TO CONTEST REDACTION.
- 3) IF IT'S ESTABLISH TO COURT/BI's SATISFACTION THAT THE SAM RECORDS ESTABLISH A MATERIAL & RELEVANT PATTERN OF OMISSION OR MISCHARACTERIZATION, IT'S MAY DESIGNATE ANOTHER 500 SAM RECORDS FOR PRODUCTION AND WHICH SHALL BE PRODUCED TO CONCLUDE DEMANDS FOR SAM FOR

Touchstone Interactive

AstraZeneca will produce all Seroquel-related content with associated metadata, current to the time of collection, and will deliver such ESI in the form of an operating environment and application software providing data access and functionality identical to that of AstraZeneca's users, plus access to all available versions of content. The deliverable for this ESI will be either a laptop computer or a virtual machine/virtual PC, the latter being the preferred format.

TOUCHSTONE INTERACTIVE

Will Produce All Seroquel-Related
CONTENT W/ ASSOCIATED METADATA
CURRENT TO THE TIME OF COLLECTION
AND WILL DELIVER IN THE FORM OF
AN OPERATING ENVIRONMENT &
APPLICATION SOFTWARE PROVIDING
DATA ACCESS & FUNCTIONALITY
IDENTICAL TO THAT OF AZ
USERS plus ACCESS TO ~~Multiple~~ ^{All Available}
VERSIONS OF CONTENT.
FORMAT IS LAPTOP OR (Preferred) VM/VPC