

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

**IN RE: Seroquel Products Liability Litigation**

**MDL DOCKET NO. 1769**

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**This Document Relates to ALL CASES**

**DECLARATION OF DARRYL DRAPER**

My name is Darryl Draper, and I declare:

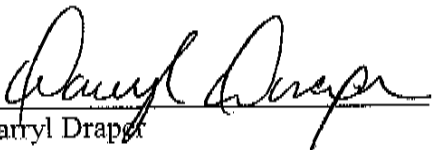
1. I am over the age of eighteen and am currently employed by AstraZeneca Pharmaceuticals, LP as a Service Performance Manager. I am familiar with the matters stated herein, based on my personal knowledge and experience at AstraZeneca, and could and would testify competently thereto under oath.
2. I submit this Declaration in support of the Objections of AstraZeneca LP and AstraZeneca Pharmaceuticals LP ("AstraZeneca") to the Special Master – ESI's Amended Third Status Report.
3. At issue is the preservation and production of documents contained in AstraZeneca's Global Electronic Library ("GEL") database.
4. GEL is a database designed to meet AstraZeneca's business need in responding to federal, foreign, and international regulatory requirements relating to all new and existing AstraZeneca drugs, not just Seroquel.
5. The primary purpose of the GEL database is to store final information for submission to those regulatory bodies.

6. The database was not designed to house permanently drafts, revisions, and comments relating to those documents. Under routine practice at AstraZeneca, once the submission was finalized, such “intermediate” materials were typically not retained in the GEL database in the ordinary course of business.
7. Thousands of AstraZeneca employees access GEL on a regular basis to create, review, edit, and comment on those regulatory documents.
8. AstraZeneca uses GEL at seventy-five sites in over fifty countries.
9. GEL contains approximately 1.75 million documents and currently contains approximately 128,000 documents (including drafts) relating to Seroquel.
10. GEL is a Documentum-based repository, which functions as a document management system.
11. One of the standard features of GEL – as with any Documentum repository – is that it has been configured to delete drafts and commentary regarding documents once they have been finalized. This is normal business practice and is achieved using standard functionality available within the Documentum product.
12. AstraZeneca employed this standard Documentum configuration for GEL to avoid the possibility of inadvertently submitting an incorrect prior version of a document to a regulatory body and to maintain a database free of obsolete drafts.
13. GEL has been operating in this manner since before the Seroquel product liability litigation commenced.

14. As a result of litigation, U.S. Clinical Document Management Specialists have routinely halted the default overwrite function to save drafts of Seroquel Clinical Development documents in GEL.
15. AstraZeneca has further developed a plan to preserve drafts of GEL documents and produce those that are responsive to legitimate discovery requests.
16. AstraZeneca has implemented a plan to retain drafts of Seroquel documents maintained in GEL going forward. As of December 21, 2007, AstraZeneca implemented a plan to export such drafts from GEL on a daily basis to be preserved in an alternative environment outside of GEL.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: January 2, 2008

  
Darryl Draper  
Service Performance Manager  
AstraZeneca Pharmaceuticals