

## **EXHIBIT A**

(Plaintiffs' Response in Opposition to AstraZeneca's Motion in Limine to Exclude Evidence and Argument about Ghostwriting)

IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

- - -

IN RE: SEROQUEL :CASE NO.  
PRODUCTS LIABILITY :  
LITIGATION :6:06-md-01769-ACC-DAB  
:  
MDL Docket No. 1769:  
:

- - -

December 20, 2007  
CONFIDENTIAL

- - -

Oral deposition of WAYNE  
MACFADDEN, M.D. taken pursuant to notice,  
was held at the offices of Golkow  
Technologies, Inc., One Liberty Place,  
51st Floor, 1650 Market Street,  
Philadelphia, Pennsylvania, beginning at  
9:01 a.m., on the above date, before Ann  
Marie Mitchell, a Federally Approved  
Certified Realtime Reporter, Registered  
Diplomate Reporter and Notary Public for  
the Commonwealth of Pennsylvania.

- - -

GOLKOW TECHNOLOGIES, INC.  
One Liberty Place, 51st Floor  
1650 Market Street  
Philadelphia, Pennsylvania 19103  
877.370.3377

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1 yes, it does.  
2 BY MR. ALLEN:  
3 Q. Does it say that above any  
4 of the other columns on this page?  
5 A. No.  
6 Q. Okay. Mandatory, where I  
7 come from, means it's required.  
8 Is that your same definition  
9 of mandatory there at AstraZeneca?  
10 MR. McCONNELL: Objection to  
11 form.  
12 THE WITNESS: Mandatory are  
13 things that should be done, yes.  
14 BY MR. ALLEN:  
15 Q. Okay. We'll talk -- we are  
16 a not going to talk about all of them,  
17 but let's look at the second bullet  
18 point. It says, "In clinical trials  
19 there was no difference in mean change of  
20 random glucose measurements between  
21 Seroquel and placebo, or between Seroquel  
22 and other antipsychotics (if and when  
23 available)."  
24 Did I read that correctly?

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1 A. Yes.  
2 Q. Is that true?  
3 MR. McCONNELL: Objection,  
4 foundation as to time.  
5 THE WITNESS: I don't recall  
6 in the participation of this  
7 document, and I can't recall if  
8 that is an accurate statement when  
9 I was with AstraZeneca.  
10 BY MR. ALLEN:  
11 Q. Sir, I want to ask you, as  
12 of February the 14th, 2005, when this  
13 final version of the vocabulary was sent  
14 to you and many other people at  
15 AstraZeneca, was it true that in clinical  
16 trials there was no difference in mean  
17 change of random glucose measurements  
18 between Seroquel and placebo or between  
19 Seroquel and other antipsychotics if and  
20 when available? Was that true?  
21 A. To the best of my  
22 recollection, there were no significant  
23 differences between Seroquel and other  
24 arms of studies.

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1 MR. ALLEN: Objection,  
2 nonresponsive.  
3 We'll come back and ask that  
4 question after the break,  
5 contemplate it.  
6 VIDEOTAPE TECHNICIAN:  
7 Sorry.  
8 It's eight minutes after  
9 1:00. We're going off the record.  
10 This is the end of Tape Number 2.  
11 - - -  
12 (A luncheon recess  
13 occurred.)  
14 - - -  
15 VIDEOTAPE TECHNICIAN: The  
16 time is 56 minutes after 1:00.  
17 This is the beginning of Tape  
18 Number 3, and we're back on the  
19 record.  
20 BY MR. ALLEN:  
21 Q. Good afternoon, Doctor.  
22 How are you?  
23 A. Good.  
24 Q. Scott Allen, again. We're

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1 back from our lunch break.  
2 And just to refocus our  
3 attention, I put back on the board  
4 Exhibit 16, which is the vocabulary and  
5 descriptions final version dated February  
6 14, 2005.  
7 Are you with me?  
8 A. I have this document, yes.  
9 Q. Doctor, this is not the  
10 first time you have seen in your entire  
11 life the Seroquel vocabulary and  
12 descriptors documents, is it?  
13 A. I recall there was a  
14 document like this around, but I was not  
15 familiar with the specifics of it.  
16 Q. Well, in fact, Doctor,  
17 you -- there was one for every year,  
18 wasn't there?  
19 A. I don't recall that.  
20 Q. And in fact, Doctor, you're  
21 on the e-mail chain as one of the  
22 individuals who was asked to give  
23 feedback concerning the drafting of this  
24 document. True?

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1 A. It was requested I give -- I  
2 was one of the listed people to whom it  
3 was sent, asking for feedback, yes.  
4 Q. Right. And the initial  
5 request for feedback came from Parexel,  
6 who you worked with on the publications.  
7 Right?  
8 A. Evidently, Parexel was  
9 involved with organizing this document,  
10 yes.  
11 Q. And Parexel helped prepare  
12 and in fact sometimes prepared entire  
13 manuscripts on AstraZeneca's clinical  
14 trials. True?  
15 A. AstraZeneca -- excuse me.  
16 Parexel would often draft  
17 manuscripts for AstraZeneca to complete.  
18 Q. And Parexel would drafts  
19 manuscripts and then contact later  
20 authors, "authors," who would then be  
21 listed as the actual author of paper that  
22 was initially drafted by Parexel. True?  
23 A. Parexel was often engaged in  
24 providing first drafts of manuscripts.

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1 Q. Yes, sir.  
2 And then if we go --  
3 MR. McCONNELL: Excuse me.  
4 He didn't finish.  
5 BY MR. ALLEN:  
6 Q. Oh, I'm sorry.  
7 Anything else you'd like to  
8 say?  
9 A. These manuscripts were then  
10 circulated to authors for their comments  
11 and reviews.  
12 Q. Okay. Now, go to Bates page  
13 77, the last two names -- numbers, excuse  
14 me.  
15 Just so we know what we're  
16 talking about here, this is, "Recommended  
17 Seroquel Vocabulary & Descriptors for Use  
18 in all External Communications."  
19 Did I read that correctly?  
20 A. Yes.  
21 Q. And it says, "Guidance for  
22 usage: These terms were identified  
23 mainly for the context of publications."  
24 And publications again is

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1 what Parexel was involved in. True?  
2 A. That was one of their  
3 activities, yes.  
4 Q. Yes.  
5 Tell the jury the other  
6 activities, such as slide sets and  
7 PowerPoints, advisory committee meetings,  
8 preparing poster boards for conventions  
9 and abstracts.  
10 Are those the other  
11 activities?  
12 A. They would often help with  
13 development of slide sets. They would  
14 often be present and help organize  
15 advisory committees and provide minutes.  
16 They would often produce the posters that  
17 were presented by AstraZeneca at  
18 meetings.  
19 Q. Right. Those would be  
20 external communications. Correct?  
21 A. Yes.  
22 Q. Okay. "Guidance for usage:  
23 These terms were identified mainly for  
24 the context of publications and should

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1 therefore be used in all publication  
2 activities as much as possible." And  
3 then it goes on.  
4 Did I read that correctly?  
5 A. Yes.  
6 Q. Now, we got to diabetes,  
7 which is two pages back. And that if --  
8 three pages, 81, four pages. The last  
9 two numbers are 81.  
10 And we have mandatory  
11 vocabulary language surrounding the issue  
12 of diabetes, or at least that's what the  
13 document, the final version, says. True?  
14 A. What's the page, please?  
15 MR. McCONNELL: He said 81.  
16 THE WITNESS: There's a  
17 column that's entitled "Diabetes -  
18 Mandatory vocabulary."  
19 BY MR. ALLEN:  
20 Q. Right.  
21 A. And in the domain, it's  
22 listed as "Recommended."  
23 Q. So you're with me under the  
24 column that says "Diabetes - Mandatory"