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January 15, 2007

Via Email and Facsimile

D. John McKay, Esquire
117 East Cook Avenue
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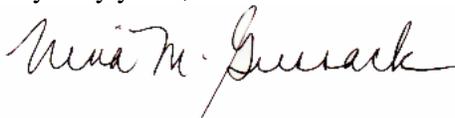
Re: In re Zyprexa Products Liability Litigation

Dear Mr. McKay:

I received your letters of January 13 addressed to Judge Weinstein and to me. Although Mr. Gottstein apparently intends to attend the hearing tomorrow in New York, we do not believe that Judge Weinstein expects to hear testimony from any witnesses regarding the Order to Show Cause. Instead, we understand that (i) Mr. Gottstein will file a response to the Order to Show Cause (as you state in your letter to Judge Weinstein) and (ii) Judge Weinstein will hear oral argument regarding whether, and under what circumstances, Mr. Gottstein's deposition may be taken. Accordingly, we do not intend to identify any documents we might use at Tuesday's hearing in addition to those that have been filed with the Court (and served on you or Mr. Gottstein) concerning our request for the Order to Show Cause.

We have been informed by Brewster Jamieson that the guardianship proceedings involving "B.B." are sealed. Thus, we do not have a copy of the petition mentioned in your letter to me or any other documents relating to that case, except for the subpoenas issued to Dr. Egilman. Because we will ask the Superior Court for permission to obtain and use documents relating to the guardianship case at Mr. Gottstein's deposition, we will be happy to discuss with you on Tuesday the position of Mr. Gottstein and his client on that question.

Very truly yours,



Nina M. Gussack

cc: Richard Meadow, Esquire
Peter Woodin, Esquire