

JAMES B. GOTTSTEIN, ABA # 7811100
jim.gottstein@psychrights.org
LAW PROJECT FOR PSYCHIATRIC RIGHTS, INC.
406 G Street, Suite 206
Anchorage, Alaska 99501
Tel: (907) 274-7686
Fax: (907) 274-9493

Attorney for Law Project for Psychiatric Rights

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

UNITED STATES OF AMERICA)	
<i>Ex rel.</i> Law Project for Psychiatric)	Case No. 3:09-CV-00080-TMB
Rights, an Alaskan non-profit)	
corporation,)	
)	
Plaintiff,)	
)	
vs.)	
)	
OSAMU H. MATSUTANI, MD, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**WITHDRAWAL OF
MOTION TO REQUIRE DEFENDANT THOMSON REUTERS
(HEALTHCARE) TO PROVIDE PSYCHRIGHTS WITH DRUGDEX
ENTRIES**

Qui tam relator Law Project for Psychiatric Rights (PsychRights®) withdraws its motion at Dkt. No. 80 and for shortened time at Dkt. No. 81, for an order requiring defendant Thomson Reuters (Healthcare) Inc. (Thomson), to provide PsychRights with full, current, electronic copies of the following DRUGDEX entries:

- | | |
|---|----------------------------------|
| 1. Abilify (Aripiprazole) | 4. Cymbalta (duloxetine) |
| 2. Adderall
(amphetamine/dextroamphetamine) | 5. Depakote (valproic acid) |
| 3. Concerta (methylphenidate) | 6. Desyrel (trazadone) |
| | 7. Dexadrine (dextroamphetamine) |

- | | |
|-------------------------------|--|
| 8. Effexor (venlafaxine) | 16. Seroquel (quetiapine) |
| 9. Haldol (haloperidol) | 17. Symbyax (fluoxetine
hydrochloride/olanzapine) - |
| 10. Invega (paliperidone) | 18. Tegretol (carbamazepine) |
| 11. Lamictal (lamotrigine) | 19. Tofranil (imipramine) |
| 12. Lexapro (escitalopram) | 20. Trileptal (oxcarbazepine) |
| 13. Neurontin (gabapentin) | 21. Vyvanse (lisdexamfetamine) |
| 14. Risperdal (risperidone) | 22. Zyprexa (olanzapine) |
| 15. Ritalin (methylphenidate) | |

(Motion).

In its Opposition, Thomson represents to the Court that PsychRights was trying to get this Court to give it free access to information Thomson "sells for a nominal fee." Dkt. No. 85, p.1. This is not true. After the Motion was filed, Thomson informed PsychRights DRUGDEX was available on Westlaw, and PsychRights immediately attempted to learn how to access it and the cost. Ex A, p 2. As demonstrated by Ex A, p. 1, however, Thomson decided not to advise PsychRights as to pricing and how to access DRUGDEX on Westlaw until the afternoon of April 1, 2010, after PsychRights pressed it for the information.

In any event, as a result of the Motion,¹ Thomson has reversed its position and is providing DRUGDEX to PsychRights by advising it how to access it through Westlaw. Therefore, the Motion is moot and PsychRights withdraws it.

RESPECTFULLY SUBMITTED this 3rd day of April, 2010.

Law Project for Psychiatric Rights, an Alaskan non-profit corporation

By: /s/ James B. Gottstein
406 G Street, Suite 206
Anchorage, Alaska 99501
Tel: (907) 274-7686
Fax: (907) 274-9493
E-mail: jim.gottstein@psychrights.org
Alaska Bar No. 7811100

¹ See, Dkt. No. 80-2, p3 (Thomson doesn't want to give PsychRights anything).

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 3, 2010, a true and correct copy of this document and accompanying proposed order was served electronically on all parties of record by electronic means through the ECF system as indicated on the Notice of Electronic Filing, or if not confirmed by ECF, by first class regular mail.

 /s/ James B. Gottstein

JAMES B. GOTTSTEIN, ABA
#7811100
Law Project for Psychiatric Rights

Subject: Fwd: RE: DrugDex Entries
From: Jim Gottstein <jim.gottstein@psychrights.org>
Date: Fri, 02 Apr 2010 06:02:28 -0800
To: "Torgerson, James E." <JETORGERSON@stoel.com>
CC: Jim Gottstein <jim.gottstein@psychrights.org>

Hi Jim,

Thomson has apparently changed its mind on telling me how to access DRUGDEX through Westlaw.

----- Original Message -----

Subject: RE: DrugDex Entries
Date: Thu, 1 Apr 2010 14:17:14 -0500
From: <jamie.mcgrady@thomsonreuters.com>
To: <jim.gottstein@psychrights.org>

Jim, I am not going to be able to get you this information. I'm really sorry that I can't be more helpful.

Jamie McGrady, J.D.
Legal Research Consultant-Alaska
West, a Thomson Reuters Business
CELL (907) 632-5024
FAX 1-866-566-4655
Email: jamie.mcgrady@thomsonreuters.com



THOMSON REUTERS

Westlaw.

From: Jim Gottstein [<mailto:jim.gottstein@psychrights.org>]
Sent: Thursday, April 01, 2010 9:45 AM
To: McGrady, Jamie (Legal)
Subject: Re: DrugDex Entries

Hi Jamie,

How are you coming on getting me the pricing and find information? I'd like to be able to work on this this weekend.

On 3/30/2010 1:11 PM, jamie.mcgrady@thomsonreuters.com wrote:

Hi Jim. I can't give you a temporary password to access these materials, for obvious reasons, but they are looking into locating the list of DrugDex evaluations and their assigned numbers in Westlaw so that you can use the "find" feature to locate those documents. That is beyond my expertise, so I have an account manager looking into this issue.

Jamie McGrady, J.D.
Legal Research Consultant-Alaska
West, a Thomson Reuters Business

CELL (907) 632-5024

FAX 1-866-566-4655

Email: jamie.mcgrady@thomsonreuters.com

THOMSON REUTERS

Westlaw.

From: Jim Gottstein [<mailto:jim.gottstein@psychrights.org>]**Sent:** Monday, March 29, 2010 2:43 PM**To:** McGrady, Jamie (Legal)**Subject:** DrugDex Entries

Hi Jamie,

It was a pleasure speaking with you, as always. I have (hopefully) attached a copy of what I call a DRUGDEX entry, for the drug Geodon (ziprasidone). What I am looking for are the similar entries for the following drugs:

1. Abilify (Aripiprazole)
2. Adderall (amphetamine/dextroamphetamine)
3. Concerta (methylphenidate)
4. Cymbalta (duloxetine)
5. Depakote (valproic acid)
6. Desyrel (trazadone)
7. Dexadrine (dextroamphetamine)
8. Effexor (venlafaxine)
9. Haldol (haloperidol)
10. Invega (paliperidone)
11. Lamictal (lamotrigine)
12. Lexapro (escitalopram)
13. Neurontin (gabapentin)
14. Risperdal (risperidone)
15. Ritalin (methylphenidate)
16. Seroquel (quetiapine)
17. Symbyax (fluoxetine hydrochloride/olanzapine) -
18. Tegretol (carbamazepine)
19. Tofranil (imipramine)
20. Trileptal (oxcarbazepine)
21. Vyvanse (lisdexamfetamine)
22. Zyprexa (olanzapine)

I am also interested in potentially getting others, such as

- alprazolam (Xanax[®])
- Clonazepam (Klonopin[®])
- clorazepate (Tranxene[®])

- diazepam (Valium[®])
- flurazepam (Dalmane[®])
- lorazepam (Ativan[®])
- temazepam (Restoril[®])
- zaleplon (Sonata[®])
- Zolpidem (Ambien[®])

The big problem is that the ones I had were cut off on the right and the court denied PsychRights' Motion for Preliminary Injunction without prejudice to refile with complete exhibits so I need them to be complete and fit on a regular 8.5 x 11 PDF page.

--

James B. (Jim) Gottstein, Esq.
President/CEO

Law Project for Psychiatric Rights
406 G Street, Suite 206
Anchorage, Alaska 99501
USA
Phone: (907) 274-7686 Fax: (907) 274-9493
jim.gottstein[at]psychrights.org
<http://psychrights.org/>

PsychRights[®]
Law Project for
Psychiatric Rights

The Law Project for Psychiatric Rights is a public interest law firm devoted to the defense of people facing the horrors of forced psychiatric drugging. We are further dedicated to exposing the truth about these drugs and the courts being misled into ordering people to be drugged and subjected to other brain and body damaging interventions against their will. Extensive information about this is available on our web site,

Exhibit A, page 3

<http://psychrights.org/>. Please donate generously. Our work is fueled with your IRS 501(c) tax deductible donations. Thank you for your ongoing help and support.

--

James B. (Jim) Gottstein, Esq.
President/CEO

Law Project for Psychiatric Rights
406 G Street, Suite 206
Anchorage, Alaska 99501
USA
Phone: (907) 274-7686 Fax: (907) 274-9493
jim.gottstein[at]psychrights.org
<http://psychrights.org/>

PsychRights®
Law Project for
Psychiatric Rights

The Law Project for Psychiatric Rights is a public interest law firm devoted to the defense of people facing the horrors of forced psychiatric drugging. We are further dedicated to exposing the truth about these drugs and the courts being misled into ordering people to be drugged and subjected to other brain and body damaging interventions against their will. Extensive information about this is available on our web site, <http://psychrights.org/>. Please donate generously. Our work is fueled with your IRS 501(c) tax deductible donations. Thank you for your ongoing help and support.

Subject: DrugDex
From: <jamie.mcgrady@thomsonreuters.com>
Date: Fri, 2 Apr 2010 13:08:49 -0500
To: <jim.gottstein@psychrights.org>

Jim, you can't get access to the Medical Litigator package for less than a 12 month contract, but you can also access the DrugDex evaluations database and be charged on a (i) per search or (ii) time basis. For a charge of \$174, you can run one search of the DrugDex evaluations and include in that one search the names of each of the drugs for which you seek an evaluation. If you need help with this search, please contact the reference attorneys at 1-800-REF-ATTY.

Jamie McGrady, J.D.
Legal Research Consultant-Alaska
West, a Thomson Reuters Business
CELL (907) 632-5024
FAX 1-866-566-4655
Email: jamie.mcgrady@thomsonreuters.com



THOMSON REUTERS

Westlaw.