

AstraZeneca Corporate Witness and Key Opinion Leader Deposition Exhibits

Barry Arnold (06/18-06/19/2008) - EU Qualified Person for Pharmacovigilance (January 2006 to present); VP Clinical Drug Safety (July 1999 – May 2006)

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Arnold 5	AZ/SER1568522-57	Presentation – “Patient Risk Management Plans”	The last page of this document is a cartoon of a man dreaming of a bag of money.	Misc.
Arnold 8	SQ1ED00431534	Email string – Weight gain and CPI Justification document (07/17/2001)	This is an email string between safety personnel at AZ describing a situation where the commercial side of the company of interfering with the SERM (Safety Evaluation and Review Meeting) body’s decision to remove “limited” as a qualifier to weight gain in the Seroquel Core Data Sheet.	Commercial Interference Weight Gain
Arnold 15	F339-E00209244	Review of All Pediatric Reports for Seroquel (12/14/2004)	This review of pediatric reports was likely prepared in response to a regulatory authority query. A description of 27 reports of glucose dysregulation begins on page 135. These include two deaths and several positive dechallenges.	Pediatric

Donald Beamish (04/22-04/23/2008) - Commercial Brand Executive Director

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Beamish 18	AZ/SER7598261	Schwartz Email Re: SIT Meeting Agenda (12/15/2003)	This is a Seroquel Issues Team Agenda that includes diabetes and label change issues just prior to the January 2004 addition of the Hyperglycemia and Diabetes Mellitus Warning to the Seroquel label.	Diabetes
Beamish 25	AZ/SER7016036	Email string – SR Trial 41 outcome (08/19/2002)	Email from the 41 Study Team indicating that the primary outcome of Seroquel SR (Sustained Release) Study 41 is “red,” which means Seroquel was no more effective than placebo in this study.	Efficacy Study 41
Beamish 27	AZ/SER3777919-20	Email string – URGENT ACTION – Trial 41 dissemination (09/10/2002) REDACTIONS	Email from Seroquel Global Brand Manager, Simon Hagger, on behalf of the Seroquel SR Communications Team advising that they are under clear instruction from the highest level in AZ not to discuss details surrounding Trial 41 with any external partners, which	Transparency/Concealing Data Efficacy

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
			would include study investigators.	Study 41
Beamish 43	AZ/SER3756506-08	Email string – Seroquel Weight Gain Story (11/08/2000)	Email string regarding the risks and benefits of the Seroquel marketing messages “weight neutral” verses “minimal weight gain”	Promotion- Weight Neutral Commercial/Sales
Beamish 44	AZ/SER3756617-18	Email string – Weight Neutral Effect Press Release (01/26/2001)	Email string regarding the adoption of “weight neutral” marketing message in the US and whether it has been approved by PRA (Promotional Regulatory Affairs)	Promotion- Weight Neutral Commercial/Sales
Beamish 45	AZ/SER4146953	O’Brien Email Re: Seroquel is Weight Neutral (02/15/2001)	Email with link to Weight Neutral press release	Promotion- Weight Neutral Commercial/Sales
Beamish 46	AZ/SER3817572-73	Holdsworth Email Re: Summary of weight information available (05/14/2001) REDACTIONS	Email differentiating “weight neutral” verses “weight neutral in the long term”	Promotion- Weight Neutral Commercial/Sales
Beamish 48	AZ/SER1250653	Seroquel and Diabetes: What We Know	Promotional piece that concludes: “To date, the available data has not established a causal link between diabetes and SEROQUEL.”	Diabetes
Beamish 49	AZ/SER4405766-68	Diabetes Sheet Draft Notes	Summary of the cost and complications associated with diabetes	Diabetes
Beamish 50	AZ/SER4144052-54	Email string – Urgent – WSJ article – Antipsychotic Induced Diabetes in Veteran Schizophrenic Patients (09/12/2003)	Email string discussing whether the company’s “party line” for a Goldman Sachs meeting remains: “There remains no reliable evidence suggesting a causal relationship between Seroquel and diabetes.”	Diabetes
Beamish 51	AZ/SER3801978-79	Email string – Seroquel Diabetes Japan (12/13/2002)	Email discussing reports of diabetes in Japan and confirming the company position that there is insufficient data for a causal relationship between diabetes or glucose dysregulation and Seroquel.	Japanese Label Change Diabetes
Beamish 59	S339-E00071844	Macfadden Email Re: JCP article (07/30/2004)	Email from Wayne MacFadden reacting to the Koller article published in the Journal of Clinical Psychiatry	Diabetes
Beamish 62	AZ/SER3781421	Owen Email Re: Seroquel Objection Handler – Koller et al abstract (08/06/2003)	Email from the Global Medical Affairs Manager for Seroquel forwarding an “Objection Handler” for use by the sales force re the Koller abstract on Seroquel and diabetes presented at the American Psychiatric	Diabetes

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
		REDACTIONS	Association	
Beamish 70	SQ1ED00493563	Email string – CNS IP Workshop (11/19/2002)	Email re trademarking certain promotional claims such as Weight Neutral	Promotion- Weight Neutral Commercial/Sales

Geoffrey Birkett (04/24-04/25/2008) – Former Vice-President Global Marketing

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Birkett 1	N/A	Documents Shown to Geoff Birkett Pre-Deposition		Misc.
Birkett 5	SQ1ED01329573	Minnick Email Re: Master Q&A – Diabetes (01/13/2004)	Email from Global Public Relations with Master Q&A concluding that the available data do not establish a causal link between Seroquel and diabetes	Commercial/Sales Diabetes
Birkett 9	SQ1ED00244314-16	Downes Email Re: Seroquel PR Plan 2001 (03/02/2001)	2001 communications will focus on increasing the existing off-label use of Seroquel	Off-label
Birkett 25	SQ1ED00127153	Email string – Field visit observations and follow ups (11/01/2004) REDACTIONS	Email re an upcoming Global Product Team meeting to “focus on risk log (metabolic and potentially others) which should include a worst case safety scenario a la Vioxx.”	Data Control
Birkett 39	SQ1ED00339384-85	Email string – More “Letters to Editor” on CATIE; weekend coverage (09/27/2005)	Email from Geoff Birkett re orchestrating coverage and steering the CATIE debate	Data Control
Birkett 40	SQ1ED00012288	Email string – CATIE Key Messages – Conference Call (09/16/2005)	Email from Geoff Birkett, former VP of Marketing, communicating the message that AZ is pleased with the outcome of CATIE	Data Control
Birkett 59	S339-E00012620	Email string – Brief Highlights (Seroquel) – Third Quarter Results (10/22/2004)	Email summarizing Seroquel media coverage and Geoff Birkett’s response that he never thought he could say Seroquel is AZ’s Megabrand.	Megabrand

Martin Brecher (05/28-05/30/2008) - Former Medical Science Director

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
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Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Brecher 5	SQ1ED02594936	Email string – Weight gain and CPI Justification document (07/19/2001)	This is an email string between safety personnel at AZ describing a situation where the commercial side of the company of interfering with the SERM (Safety Evaluation and Review Meeting) body's decision to remove "limited" as a qualifier to weight gain in the Seroquel Core Data Sheet. It is similar to Arnold 8.	Commercial Interference Weight Gain
Brecher 6	AZSER08465577-79	Email string – Study 15 Abstract for APA (12/15/1998)	Email string about whether to publish "failed" Study 15 as an abstract	Study 15
Brecher 7	AZSER06769612-13	Email string – Short Report on Weight Gain (03/02/2000)	Email string about how AZ intends to cut OLE (Open Label Extension) IIIb data in order to support its "weight neutral" promotional claim and questioning whether it could be damaging commercially to switch back to "minimal weight gain" claim	Promotion- Weight Neutral Commercial/Sales
Brecher 8	AZ/SER6769648-51	Email string – Brecher, Rak, Melvin & Jones Long-Term Seroquel Weight Article (03/19/2001)	Email string suggesting weight gain data do not support the promotional claim of "weight neutral." Includes a graph which shows a dramatic increase in weight gain after 52 weeks.	Promotion- Weight Neutral Commercial/Sales
Brecher 9	SQ1ED00099297	Email string – Weight Gain (03/08/2000)	More email exchanges about how AZ can support a "weight neutral" claim	Promotion- Weight Neutral Commercial/Sales
Brecher 10	SQ1ED00099305	Email string – Weight Gain (03/10/2000)	Email from Martin Brecher stating that the data is "more accurately characterized by minimal weight gain, but weight neutral is defensible."	Promotion- Weight Neutral Commercial/Sales
Brecher 12	AZSER06769645-47	Email string – Brecher, Rak, Melvin & Jones Long-Term Seroquel Weight Article (03/19/2001)	Martin Brecher's response to Brecher 8 email string	Promotion- Weight Neutral Commercial/Sales
Brecher 14	SQ1ED00604730	Holl Email Re: Expired items to destroy (06/08/2004)	Email instructing that the Brecher reprint carrier (which contained Brecher's weight paper which was previously unsealed) be destroyed	Promotion- Weight Neutral Commercial/Sales
Brecher 15	AZSER06769635-38	Email string – Brecher, Rak, Melvin & Jones Long-Term Seroquel Weight Article (03/20/2001)	Email from Martin Brecher stating that his paper supports "minimal weight gain" (as opposed to "weight neutral"). This email is part of the same string as Brecher 8 and 12.	Promotion- Weight Neutral Commercial/Sales
Brecher 16	AZSER06777548	Brecher Email Re: SERM	Email from Martin Brecher summarizing the decisions	Commercial Interference

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
		(06/22/2000)	of SERM (Safety Evaluation and Review Meeting), including the removal of the weight gain qualifier "limited" from the Seroquel CDS (Core Data Sheet).	Weight Gain
Brecher 20	AZSER07410458-59	Email string – Response to FDA Seroquel letter (05/11/2000)	Email discussing plan for responding to the FDA May 2000 inquiry re hyperglycemia and related metabolic issues and Seroquel	Diabetes
Brecher 27	AZ/SER7013363	Email string – Diabetes-related Deaths (07/11/2002)	Email between Martin Brecher and Wayne Geller re the number of Seroquel diabetes related deaths	Diabetes
Brecher 28	SQ1ED01932372-73	Sahl Email Re: Seroquel Borison Reserve Press Statement (06/29/1996)	Email forwarding AZ's press release on the involvement of convicted felons, Richard Borison, MD and Bruce Diamond, MC, in the Seroquel clinical trials	Borison/Diamond
Brecher 29	N/A	"Borison –Diamond: Systemic Failure, No Checks and Balances" (08/18/1997)	WSJ article on Borison and Diamond	Borison/Diamond
Brecher 31	F339-E01124901	Justification Document – Seroquel – Weight Gain	Justification Document prepared following a 2000 SERM (Safety Evaluation and Review Meeting) where it was decided the weight gain qualifier "limited" would be removed from the Seroquel Core Data Sheet. This is the document which justifies that decision.	Commercial Interference Weight Gain
Brecher 35	SQ1ED00360020	Manuscript – the long-term effect of quetiapine ("Seroquel") on weight in patients with schizophrenia (03/29/2000)	Draft of Brecher's 2000 weight paper	Promotion- Weight Neutral Weight Gain
Brecher 36	S339-E00627366	Email string – Brecher reprints (03/02/2002) REDACTIONS	Email indicating that Brecher's reprint carrier continues to move quickly	Promotion- Weight Neutral Weight Gain
Brecher 37	S339-E00632364	Email string – Brecher study (07/02/2002)	Email chain re Brecher's reprint being key on the topic of weight gain	Promotion- Weight Neutral Weight Gain
Brecher 42	AZ/SER4867379-80	Email string – Brecher Reprint Holder (03/04/2001)	Email from John Traver's re the problems with "pooling" data (including Brecher's paper)	Pooling/Dredging/Spinning/ Mining Data Weight Gain

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Brecher 43	SQ1ED01598630	Email string – Brecher weight manuscript (06/30/2006)	Email from Martin Brecher re spinning data and de-emphasizing weight gain	Pooling/Dredging/Spinning/ Mining Data Weight Gain
Brecher 44	AZSER15394318-22	Email string – Seroquel France Feedback from Prof Montgomery (02/07/2005)	Email re Study 50 “data mining” (p. 5 of the email string)	Pooling/Dredging/Spinning/ Mining Data

David Brennan (06/20/2008) - Chief Executive Officer, Chairman of the Senior Executive Team (SET)

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Brennan 8	AZSER10769859	Seroquel Strategy Summary (12/18/2000) REDACTIONS	Key Success Factors: Broaden Seroquel use on and off label	Off-label Pooling/Dredging/Spinning/ Mining Data Commercial/Sales
Brennan 12	AZ/SER4791302	Agenda – Ops Plan 2003 Meeting (05/30/2002)	Megabrand	Megabrand
Brennan 13	N/A	DuPont Country Club Website	Publically available document. Location of Ops Brand Meeting referred to in Brennan 13.	Misc.
Brennan 17	AZSER13112545	AstraZeneca Commitment to Responsible Sales and Marketing Practices (05/2004)	States that AZ does not promote off-label uses	Off-label
Brennan 18	N/A	Parexel Proposal/Budget – Trial 99, 104, 105 Abstract Preparation and Submission – USPMHC (09/16/2003) REDACTIONS	Parexel MMS (Medical Marketing Services) proposal which provides: “To ensure a successful launch of the Seroquel mania in bipolar indication, and continued growth of off-label use in bipolar disorders, AstraZeneca must continue to provide researchers and prescribers with data from pivotal trials . . . ”	Off-label
Brennan 19	N/A	Parexel Proposal/Budget – Abstract	Parexel MMS (Medical Marketing Services) proposal	Off-label

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
		Development and Submission: New Research – APA (10/24/2003) REDACTIONS	which provides: “To ensure a successful launch of the Seroquel mania in bipolar indication, and to continue to grown the market of off-label use in bipolar disorders, AstraZeneca must continue to provide researchers and prescribers with data from secondary analysis.”	
Brennan 20	AZ/SER0612843	Hess Email Re: Trial 49 slide set CME review changes (05/26/2004) REDACTIONS	“all off-label slides are financed outside of commercial for obvious legal reasons”	Off-label
Brennan 23	SQ1ED00477988-90	Email string – Dr. Reinstein (11/13/2001)	This a background on the letter sent from Michael Reinstein, MD to AZ CEO, David Brennan. “Reinstein could be worth as much as \$500 million dollars to AZ over his career.”	Reinstein
Brennan 26	N/A	Parexel Project Brief – AACAP (American Academy of Child & Adolescent Psychiatry) 2005 Abstract Submission (02/14/2005) REDACTIONS	Proposal for promoting Seroquel to adolescent psychiatrists	Off-label Pediatric
Brennan 28	AZ/SER4209846-47	Maurer Email Re: PCP Detailing Exploratory Focus Groups Report (10/02/2002)	Contains handwritten notes by Denise Campbell, Consumer Brand Director, including “grease the skids for dementia” and “turn on the DTC (Direct To Consumer) machine”	Off-label
Brennan 31	AZSER10772557-58	Draft Letter Re: AZ’s promotion of Seroquel	Email from David Brennan to Dan Huffman responding to his concerns about sales representatives promoting Seroquel to child and adolescent psychiatrists	Pediatric Off-label

Vikram Dev (06/02-06/03/2008) - VP of U.S. Drug Safety

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
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Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Dev 5	N/A	Biotech Science News – “2 nd Annual Post Approval Drug Safety Strategies”	Agenda for meeting at which Vikram Dev was a speaker.	Misc.
Dev 9	SQ1ED00442118	Minutes – Seroquel USPT Meeting (05/10/2000)	Lists the team who will be responsible for dealing with the FDA’s August 200 letter requesting information on Seroquel and diabetes	Diabetes
Dev 12	AZSER15426662-65	Email string – L. Bassin Drug Safety: accomplishments for performance evaluation (01/08/2004) REDACTIONS	Email re Drug Safety’s achievements on the Seroquel diabetes issue including “data dredging” and “protecting the compound” which resulted in \$1.5 billion in sales.	Pooling/Dredging/Spinning/ Mining Data
Dev 14	N/A	CDS Summary and Conclusions (08/27/2002)	Re removal of the weight gain qualifier “limited” from the Seroquel Core Data sheet	Commercial Interference Weight Gain
Dev 15	AZSER19852030-31	Email string – Proposed revision of decision on Wt Gain CDS wording (06/26/2002)	Email string re removal of the weight gain qualifier “limited” from the Seroquel Core Data sheet	Commercial Interference Weight Gain
Dev 19	AZ/SER1923902-04	Discussion Document – Seroquel – Weight Gain (06/22/2000)	Discussion Document prepared for the June 2000 SERM (Safety Evaluation and Review Meeting) at which it was decided the weight gain qualifier “limited” would be removed from the Seroquel Core Data sheet. This was not done until 2 years later.	Commercial Interference Weight Gain
Dev 25	AZ/SER6992706	Email string – Weight gain and SERM (07/20/2001)	Email from Russell Giddons, Head of Global Regulatory Affairs for Seroquel, questioning why “limited” would remain as a qualifier to weight gain in the Core Data Sheet even though SERM had decided otherwise.	Commercial Interference Weight Gain
Dev 44	AZ/SER6970938-40	Email string – Archive Access (07/06/2000)	SERM minutes are kept brief by virtue of legal request	Misc.
Dev 55	AZ/SER6976855	Meeting Notification – Ad Hoc SERM – Seroquel and Diabetes Mellitus (12/13/2000)	Meeting notification to discuss diabetes and the Dutch Health Authority. This relates to Wayne Geller’s submission of the Safety Position Paper to the Dutch authority that resulted in the label change.	Dutch Submission Diabetes

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Dev 56	AZ/SER6998283	Meeting Notification – Ad Hoc SERM – Seroquel (11/12/2001)	To discuss Liver Dysfunction	Misc.
Dev 57	AZ/SER2289784	Meeting Notification – March SERM (03/26/2002)	Topics of discussion are not identified – just “Seroquel”	Misc.
Dev 58	AZSER09665428	Meeting Notification – SERM – Seroquel (02/19/2004)	Topics of discussion are not identified	Misc.
Dev 59	SQ1ED01523066	Email string – SERM (06/02/2005) REDACTIONS	Topics of discussion are not identified – just “Seroquel”	Misc.
Dev 60	AZ/SER4756691	Meeting Notification – Seroquel SERM (06/01/2006)	Seroquel to be discussed	Misc.

Susanne Fors (10/31-11/01/2007) - Global Regulatory Affairs Director

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Fors 5	AZ/SER1561853-54	Email string – Invitation to Influencing Skills Workshop for Global & Regional RADs (08/26/2005)	Regulatory Affairs influencing workshop	Misc.
Fors 6	AZ/SER3992491	Slide – Seroquel Risk-Benefit Team	Provides a list of team members	Misc.

Wayne Geller (05/07-05/09/2008) – Former Global Drug Safety Physician (GDSP) for Seroquel

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Geller 15	AZSER12993791-803	Discussion Document – Seroquel – Weight Gain (06/22/2000)	Discussion Document prepared for the June 2000 SERM (Safety Evaluation and Review Meeting) at which it was decided the weight gain qualifier “limited” would be removed from the Seroquel Core Data sheet. This was not done until 2 years later. Similar to Dev 19.	Commercial Interference Weight Gain
Geller 16	SQ1ED00428635	Email string – Seroquel and Diabetes (10/31/2000)	Email chain regarding AZ’s efforts to withdraw the Safety Position Paper send by Wayne Geller to the	Dutch Submission

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
			Dutch regulatory authorities.	Diabetes
Geller 19	AZSER06773568-77	Justification Document – Seroquel – Weight Gain (04/05/2001)	Justification Document prepared following a 2001 SERM (Safety Evaluation and Review Meeting) where it was decided the weight gain qualifier “limited” would be removed from the Seroquel Core Data Sheet. This is the document which justifies that decision. The same decision was made following a June 2000 SERM but the Core Data Sheet was not actually changes until 2002.	Commercial Interference Weight Gain
Geller 20	SQ1ED00428297-98	Email string – Quetiapine and glucose metabolism disorders with Safety Position Paper attached (09/18/2000)	Email from Wayne Geller forwarding his Safety Position Paper on diabetes for submission to the Dutch regulatory authority. Similar emails have already been unsealed.	Dutch Submission Diabetes

Jeffrey Goldstein (06/04-06/05/2008) - Former Director of Clinical Science

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Goldstein 6	AZ/SER4235710-12	Email string – Thank you for your assistance (12/07/2004)	Email from Goldstein responding to Jack Schwartz's request for data to give to Dr. Jennings stating that AZ has not "systematically investigated the effects of quetiapine on glucose mechanisms because this was never flagged as a development issue with quetiapine"	Diabetes
Goldstein 7	AZ/SER4239852-54	Email string – Drug discrimination studies with Seroquel (11/17/1997)	Email string between Jeffrey Goldstein, Michael Czupryna (Global Team; development), and Andrew Goudie (UK researcher) regarding the funding for quetiapine research transitioned from the responsibility R&D to Sales and Marketing	Research Control Commercial/Sales
Goldstein 8	AZ/SER1529423	Dwyer Letter to AZ Re: Obtaining Research Support (12/14/1999)	Letter from Donald Dwyer requesting funds for studying the regulation of glucose transport as it related to diabetes and psychiatric disorders	Research Control Diabetes
Goldstein 9	AZ/SER1529424-25	Draft Abstract – Effects of	2-page summary of Dwyer's proposed glucose	Research Control

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
		Quetiapine on Glucose Metabolism in Cultured Neuronal Cells	transport study; handwritten notes by Goldstein questioning "not weight gain associated with hyperglycemia;" proposal was rejected by AZ	Diabetes
Goldstein 10	AZ/SER1520501	AZ Letter to Dwyer denying financial support (01/24/2000)	AZ letter to Dwyer rejecting Dwyer's proposal on the grounds of lack of funds	Research Control Diabetes
Goldstein 11	N/A	"Induction of hyperglycemia in mice with atypical antipsychotic drugs that inhibit glucose uptake" – Dwyer (2003)	Dwyer article on "Induction of hyperglycemia in mice with atypical antipsychotic drugs that inhibit glucose uptake."	Research Control Diabetes
Goldstein 14	AZ/SER4240795	Goldstein Email Re: Seroquel sample request (06/08/1998)	Email from Jeffrey Goldstein to Michael Czupryna re Goldstein's reluctance in "approving research involving Seroquel's receptor properties because we have been burned in the past;" he will approve research "provided [that] we see the data before publication and can exercise the right to withhold publication if it muddies that waters to much more"	Research control
Goldstein 15	AZ/SER4239783-86	Email string – Quetiapine Matters (02/23/2001)	Email from Jeffrey Goldstein to Andre Goudie denying pre-clinical proposal on weight gain citing shifting commercial priorities as a reason	Research Control Weight Gain Commercial/Sales
Goldstein 17	AZ/SER1529365	Goldstein Email Re: sample requests (07/18/2002) REDACTIONS	Proposal on the diabetogenic and hyperlipidemia side effects of quetiapine; concern about the potential risk and damage if the study had negative results.	Research Control Diabetes Commercial/Sales
Goldstein 31	AZ/SER2319265-68	Minutes – Seroquel BEST (11/24/2004) REDACTIONS	Trials 104 and 105 (bipolar mania trials) – "The team agreed from a commercial perspective that data must be published quickly in order to support key claims for the brand. Therefore, if the authors	Research Control Commercial/Sales

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
			recommend anything that will slow this process, AZ should consider asking them to step down from this project”	
Goldstein 33	AZ/SER1538492-94	Williams-Hughes Email Re: Letter to JAACAP quetiapine and hyperglycemia/hypertriglyceridemia (05/30/2002)	Letter to the Editor of the Journal of the American Academy of Child and Adolescent Psychiatry re Quetiapine-Associated Hyperglycemia and Hypertriglyceridemia	Pediatric Diabetes
Goldstein 35	SQ1ED00146181; AZ/SER1525213-15	Email string – Seroquel Objection Handler – Koller et al abstract (08/06/2003)	Koller et al. "Quetiapine associated diabetes mellitus" Objection Handler. Similar to Beamish 62.	Diabetes
Goldstein 37	N/A	Summation Printout for AZ/SER4237890-93	This document shows that another exhibit came from AZ’s document production in this litigation.	Misc
Goldstein 41	SQ1ED01340434	Goldstein Letter to Dr. Small Re: Recent manuscripts and posters on Seroquel (01/04/1999)		Misc.
Goldstein 44	AZSER10068202-04	Email string – IIT benchmarking report (08/07/2003) REDACTIONS	Email forwarding an IIT (Investigator Initiated Trials) benchmarking report that analyzes AZ’s competitors’ investments in IITs. The email summarizes many of the findings including Eli Lilly’s ability to keep negative data well hidden and spin data through an effective publications team, and how Janssen is able to control publications of its data and how it rewards investigators who publish favorable results. Recommendations from the report include “Publications should be more creative spinning the data (aka Lilly).”	Pooling/Dredging/Spinning/ Mining Data Research Control
Goldstein 46	AZSER07395889-905	Draft Sacchetti paper – Incidence of diabetes in patients taking haloperidol, olanzapine, risperidone, and quetiapine		Diabetes
Goldstein 48	N/A	Abstract – “Incidence of diabetes in a general practice population” – Sacchetti (01/2005)		Diabetes

Marianne Jackson (04/07-04/08/2008) - National Sales Director

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Jackson 3	AZ/SER4163293-94	Email string – KOL ASSET Presentation (08/18/2003)	Email from Johan Hoegstedt, who was the VP of specialty care at the time, re the benefit to the business of KOL and clinical trial control and management	Research Control
Jackson 18	AZSER08667462	Russo Email Re: Glucose for Trial 41 (12/20/2002)	"All 7 values for the clinically significant glucose are high"	Study 41 Diabetes
Jackson 23	AZ/SER3958123	Outline of Field Voicemail Re: WSJ article	Key points for sales force to communicate re the WSJ article on Seroquel and diabetes. Key points to remember – "No reliable evidence to suggest a causal relationship between Seroquel and diabetes"	Commercial/Sales Diabetes
Jackson 25	AZ/SER3593606-07	Email string – diabetes information (02/15/2006)	Email string re "neutralize" legal ads on diabetes and weight gain	Commercial/Sales Diabetes Weight Gain
Jackson 26	AZ/SER7894790-94	Email string – Phase II communication for Negative Legal Ads (05/05/2006)	Email chain re discussions with prescribers following the issuance of a Dear Healthcare Provider letter and how to deal with negative legal ads. Al Paulson suggests assigning doctors red, yellow or green lights depending on their knowledge of the subject matter and advising sales reps how to deal with those doctors.	Commercial/Sales Diabetes
Jackson 27	AZ/SER7736718-20	Email string – Negative Impact from Commercials (02/24/2006)	Email string re negative legal ads. Mentions educating KOLs (Key Opinion Leaders) on how to deal with the legal noise around Seroquel (especially the metabolic issues)	Commercial/Sales Diabetes
Jackson 28	AZ/SER3958957	Handwritten Notes	Notes by Marianne Jackson including "Seroquel will be the leading brand in the treatment of mental illness and improvement in patients lives."	Misc.
Jackson 33	AZSER10330928	Email string – Stretch Goal	Email string between Jackson and Thomas	Commercial/Sales

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
		Agreement (03/08/2004)	Viscount, an area sales director, re stretching the average daily dose of Seroquel. He writes: "We are finally on the same wavelength and I like to start tracking progress at the BC (business center) level and provide Marianne with updates on a regular basis." The stretch goals are how far the business centers should stretch the average daily does.	
Jackson 41	AZ/SER2844065-66	Gionta Email Re: KOLs & Diabetes Topics at AstraZeneca Programs (06/11/2004)	PSSs (Pharmaceutical Sales Specialists) are to focus on the efficacy and safety benefits of Seroquel (in promotion and programs) and not diabetes and related metabolic issues. In addition, PSSs should not proactively ask speakers to talk about diabetes or give the impression to potential attendees that diabetes will be addressed at the program.	Commercial/Sales Diabetes
Jackson 42	AZ/SER4298497	Hatzipavlidis Email Re: Summary of Actions in Response to WSJ Article (08/22/2003)	The WSJ article was on the Cunningham study that was not favorable to second generation antipsychotics like Seroquel on the diabetes issue.	Commercial/Sales Diabetes
Jackson 43	AZ/SER3958123	Outline of Field Voicemail Re: WSJ article	Same as Jackson 23	Diabetes
Jackson 53	N/A	AZ – Marketing & Sales Business Policies and Guidelines	Discusses AZ's commitment to operating its business in an ethical and legal manner	Misc.

Gerald Limp (05/20-05/21/2008) - U.S. Regulatory Affairs (Deceased)

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Limp 2	N/A	Documents Provided to Gerald Limp for Review in Preparation for Deposition		Misc.
Limp 3	N/A	Seroquel Clinical Trial report summaries	This is a print out of AZ's clinical trial summaries website. It is publically available.	Misc.
Limp 4	N/A	Handwritten Notes	This is a note by the examining attorney which emphasizes Limp's testimony that he had no involvement with the Seroquel Code Data Sheet.	Misc.

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Limp 6	N/A	Physician Desk Reference (2003)	Seroquel Product Label	Misc.
Limp 10	SQ1ED00367420	Email string – Updated Communications on Diabetes (09/30/2003)	Email string re the updates on correspondence sent out in the US on Seroquel and diabetes. Attached to the email are (1) a chart showing the deviations in product labels from country to country re Glucose Dysregulation, (2) a July 24, 2003 Position Paper on Seroquel and Glucose Dyregulation, (3) a June 2001 letter from the European PhVWP with agreed product label warnings for certain atypical antipsychotics, including Seroquel, and glucose intolerance and diabetes, and (4) and email from Marianne Jonsson re the June 2001 PhVWP letter and a brief background of communications with various countries on this issue.	Diabetes
Limp 12	N/A	Physician Desk Reference (2004)	Seroquel Product Label	Misc.
Limp 13	AZSER10376373-74	AZ Dear Health Care Provider Letter (01/30/2004)	Letter sent to physicians by AZ following the addition of a Hyperglycemia and Diabetes Mellitus Warning to the product label	Diabetes
Limp 16	N/A	Physician Desk Reference (2008)	Seroquel Product Label	Misc.
Limp 17	N/A	21 CFR 314.70	Excerpts from the Code of Federal Regulations re changes to product labeling	Misc.
Limp 19	N/A	21 CFR 99.201	Excerpts from the Code of Federal Regulations re changes to product labeling	Misc.
Limp 22	N/A	Seroquel – Clinical Overview: Glucose dysregulation in patients treated with Seroquel (06/2007)	This is AZ's analysis of clinical trial safety data, including that of Studies 125, 126 and 127, that was submitted to the FDA along with the company's Changes Being Effected letter that resulted in the addition of safety data to the Hyperglycemia subsection of the Adverse Reactions section of the Seroquel product label.	Diabetes
Limp 28	AZSER19781451-538	AZ Letter to FDA Re: Hyperglycemia Safety Information (08/31/2000)	Letter from AZ to FDA in response to the FDA's May 2000 request for data on the connection between Seroquel and glucose regulation. It encloses AZ's "Response to FDA request for further safety information to assess the possibility of a causal	Diabetes

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
			association between Seroquel treatment and disturbances in glucose regulation.”	
Limp 29	SQ1ED00098892	FDA Letter to Zeneca Requesting Safety Data (05/01/2000)	This is the May 2000 letter to AZ from the FDA requesting data on the connection between Seroquel and glucose regulation.	Diabetes
Limp 30	SQ1ED00098843	Witch Email Re: first draft of FDA response (07/05/2000)	This is a first draft of AZ’s August 2000 response to the FDA. It contains further possible areas of discussion.	Diabetes
Limp 36	SQ1ED00428297	Email string – Quetiapine and glucose metabolism disorders (09/18/2000)	Email from Wayne Geller forwarding his Safety Position Paper on diabetes for submission to the Dutch regulatory authority. Similar emails have already been unsealed.	Dutch Submission Diabetes
Limp 39	AZSER04237924-51	Replenski Email Re: Important Information on Label Changes to Seroquel in Japan (11/06/2002)	Email re Japan’s imposition of a diabetes warning to the Seroquel product label. Attachments to the email include (1) translated Japanese label, (2) translated Emergency Safety Information on Diabetic Ketoacidosis and Diabetic Coma due to Increase in Blood Glucose Level during Administration of Seroquel, Antipsychotic, (3) a draft Voicemail Script from Lisa Lloyd Washington, Brand Director for Seroquel, re the change to the Japanese label and reinforcing AZ’s message that no causal relationship have been established between Seroquel and diabetes related conditions, (4) translated Dear Doctor Provider letter disseminated in Japan, (5) Seroquel – Diabetes Q&A provided to pharmaceutical sales reps again reinforcing AZ’s message that no causal relationship have been established between Seroquel and diabetes related conditions, and (6) a Seroquel Publications Alert by Richard Olbrich, Global Medical Affairs Manager, Seroquel, re a study published in the Journal of Clinical Psychiatry on The effects of Novel Antipsychotics on Glucose and Lipid Levels.	Japanese Label Change Diabetes
Limp 41	SQ1ED00159118-20	Melville Email Re: Request for information on diabetic events	Email from Margaret Melville re a request from a product manager in New Zealand for information re Eli	Japanese Label Change

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
		(10/20/2002)	Lilly's promotional claim that Zyprexa is no different from other antipsychotics in terms of diabetic events. AZ apparently submitted a formal complaint re this claim. Attached to the email is an email from Linda Warner with a copy of AZ's October 2002 Assessment of Diabetes in Patients Treated with Seroquel (quetiapine fumarate): Response to Japanese MHLW.	Diabetes
Limp 49	SQ1ED00066960	Email string – Seroquel Diabetes Issues – Changes to Zyprexa PI in Australia (12/12/2002)	Email re Eli Lilly's proactive Australian Dear Doctor letter re the increased prevalence of diabetes in patients with schizophrenia. Margaret Melville notes that Lilly was able to put their findings in context with the first sentence – diabetes incidence is increased in schizophrenic patients.	Diabetes
Limp 51	SQ1ED00305833	McKenna Email Re: Wayne Pines REDACTIONS	Email from Kevin McKenna to Gerald Limp providing contact information for Wayne Pines and indicating he believes the confidentiality agreement from the diabetes/hyperglycemia work as well as his involvement in the 2004 ESA Regulatory Advisory Board would still be valid. Mr. Pines may have been hired by AZ as a consultant on the Seroquel diabetes issue.	Diabetes
Limp 52	N/A	APCO Worldwide – Bio – Wayne Pines	From the APCO Worldwide website	Diabetes

Wayne Macfadden (12/20-12/21/2007) - Former Director Clinical Research and U.S. Physician for Seroquel

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Macfadden 1	N/A	Curriculum Vitae – Wayne Macfadden, M.D.		Misc.
Macfadden 4	AZSER10376373-74	AZ Dear Health Care Provider Letter (01/30/2004)	Dear Doctor Letter re addition of hyperglycemia and diabetes warning to label	Diabetes
Macfadden 6	AZ/SER2703900-01	Email string – KOLs & Diabetes Topics at AZ (07/06/2004)	Email from Lynn Gionta, Strategic Internal Communications Manager for the Seroquel Brand Team, with an attached voicemail for sales	Commercial/Sales Diabetes

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
			representatives instructing them to steer clear of diabetes and related metabolic issues and not proactively ask speakers to talk about diabetes.	
Macfadden 12	AZ/SER4717728	Piano Email RE: Donna Casparro and Lauren Duby (08/02/2005)	Email from Parexel's Group Director, Client Services, Claudia Piano, announcing the promotions of two Parexel employees	Misc.
Macfadden 15	AZSER09954712	Ungerstedt Email Re: Delayed decision regarding Diabetes and Glucose Issue (03/17/2004)	Email from Martin Ungerstedt, Study Management Specialist Seroquel, identifying Wayne MacFadden as the physician who is leading the diabetes and glucose issue.	Misc.
Macfadden 19	N/A	Corporate Responsibility Summary Report (2006)	Page 11 of the documents provides: "As part of our commitment to proving information about our medicines to those who need it, we publish and provide open access via the Internet to the findings of our clinical trials, whether favorable or unfavorable."	Transparency/Concealing Data
Macfadden 20	N/A	Seroquel Clinical Trial report summaries	This was printed from AZ's Clinical Trials Website on December 5, 2007, approx. 15 days before the deposition of Dr. MacFadden. Studies 15 and 31 do not appear.	Transparency/Concealing Data
Macfadden 21	N/A	Seroquel Clinical Trial report summaries	This was printed from AZ's Clinical Trials Website during the deposition of Dr. MacFadden. Studies 15 and 31 still do not appear.	Transparency/Concealing Data
Macfadden 41	AZSER10114110	Email string – Trial 31 (10/07/2003)	Email from Wayne MacFadden to Ihor Rak indicating they are trying to "put SQL study #31 to bed." Study 31 was titled "A Multicenter, Double-Blind, Randomized, Comparison of Seroquel and Chlorprozamine in the Treatment of Subjects with Treatment-Resistant Schizophrenia." In MacFadden 45, MacFadden describes the results of the study: "In summary, SQL and CPZ both achieved similar low levels of response in this treatment refractory population. Total, and positive subscale BPRS change scores demonstrated a statistically significant	Transparency/Concealing Data Efficacy

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
			advantage for CPZ, negative BPRS subscale from SQL.”	
Macfadden 42	AZ/SER2562573-75	Email string – Quetiapine study (11/08/2004)	Email string beginning with an email from Nancy Ortiz, Sr. Medical Information Scientist – CNS, re a request from her Key Opinion Leader, for the results of Study 31 on which he was an investigator.	Transparency/Concealing Data
Macfadden 43	AZ/SER6387702-03	Email string – Quetiapine study (12/14/2004)	Continued email re Dr. Citrome’s request for the results of Study 31. Margaret Melville suggests MacFadden put together 3 or 4 sentences describing the results while the Senior Executive Team decides whether Study 31 will be published on the AZ Clinical Trials Register. She suggests MB (Martin Brecher) and MacFadden get it approved by commercial.	Transparency/Concealing Data
Macfadden 45	AZ/SER6319088-90	Email string – Trial 31 Position (12/17/2004)	Email from Wayne MacFadden summarizing the results of Study 31.	Transparency/Concealing Data
Macfadden 46	AZ/SER5500083-85	Email string – Trial 31 Position (12/18/2004)	Email from Martin Brecher indicating in bold the parts of MacFadden’s summary that he believes represents a “short, fair balanced summary.”	Transparency/Concealing Data
Macfadden 47	AZ/SER6694344-46	Email string – Trial 31 Position (12/20/2004)	Email from Martin Brecher advising that he, Jack Schwartz, Martin Jones and Eileen McCormack agreed they would “inform Dr. Citrome (a Lilly advocate) that the response rate on Seroquel was 8%; 7% on CPZ,” and that more results would be posted on the AZ clinical trial website. Study 31 was never posted on the website.	Transparency/Concealing Data
Macfadden 49	AZSER10129852	Email string – Message points (05/04/2004)	This email confirms MacFadden had media training.	Misc.
Macfadden 51	N/A	Letters to the Editor (03/2003)	American Journal of Psychiatry Letters to the Editor on Safety of Quetiapine During Pregnancy	Misc.
Macfadden 52	AZSER0987479-81	Seroquel – Use During Pregnancy and Nursing	Prescribing information – Seroquel Use During Pregnancy and Nursing. This references MacFadden 51.	Misc.
Macfadden 53	N/A	“The Maudsley Antipsychotic	Includes information on the pharmacology of	Misc.

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
		Medication Review Service Guidelines" by Ohlsen, Smith, Taylor and Pilowsky	atypical antipsychotic drugs and practical guidelines for switching from one antipsychotic drug to another.	
Macfadden 58	AZSER10375552	Email to Wayne MacFadden from [redacted] re: First Episode Psychosis (09/24/2003) REDACTIONS	Redacted email between Wayne MacFadden and the clinical researcher and author with whom he had an affair.	MacFadden Relationships
Macfadden 59	AZSER10376076-77	Email from Wayne MacFadden to [redacted]re:Movies, etc. (03/29/2002) REDACTIONS	Redacted email between Wayne MacFadden and the clinical researcher and author with whom he had an affair which includes his ideas for a Seroquel study design.	MacFadden Relationships
Macfadden 60	AZSER10375844	Email from Wayne MacFadden to [redacted]re: bipolar disorder (02/01/2006) REDACTIONS	Redacted email between Wayne MacFadden and the clinical researcher and author with whom he had an affair. In this email, MacFadden requests information from the clinical researcher re BMS's trials on bipolar depression in return for sexual favors.	MacFadden Relationships
Macfadden 61	AZSER10376068-69	Email string – bad dreams (05/06/2002) REDACTIONS	Redacted email between Wayne MacFadden and the clinical researcher and author with whom he had an affair.	MacFadden Relationships
Macfadden 63	AZSER10375875	Email string – hello (01/15/2006) REDACTIONS	Redacted email between Wayne MacFadden and the clinical researcher and author with whom he had an affair. The clinical researcher comments that she is frantically trying to finish her quetiapine paper.	MacFadden Relationships
Macfadden 64	AZSER10375545-46	Email string – Nov IIT mtg (08/01/2002) REDACTIONS	Redacted email between Wayne MacFadden and the clinical researcher and author with whom he had an affair.	MacFadden Relationships
Macfadden 65	AZSER10375549	Email string – AZ mtg invite (01/02/2003)	Redacted email between Wayne MacFadden and the clinical researcher and author with whom he had an affair.	MacFadden Relationships

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
		REDACTIONS		
Macfadden 66	AZSER10375588-89	Email string – WWS poster for ATP (01/26/2004) REDACTIONS	Redacted email between Wayne MacFadden and the clinical researcher and author with whom he had an affair. In this email, the clinical researcher's poster to be presented at the ATP which was approved by MacFadden.	MacFadden Relationships
Macfadden 68	AZSER10376057-61	Macfadden Email Re: Jan mtg (12/23/2003) REDACTIONS	Redacted email between Wayne MacFadden and the clinical researcher and author with whom he had an affair. The salacious material that has been redacted was disguised as a consent and authorization form.	MacFadden Relationships
Macfadden 69	AZSER10145798	Email Re: APA 2006 abstracts have been submitted (12/02/2005)	Email announcing the submission of 19 abstracts worked on by Parexel to the American Psychiatric Association, including those on the BOLDER bipolar depression trials.	Misc.
Macfadden 70	AZSER10375708	Email string – CINP: Poster number and presentation info needed (06/27/2006) REDACTIONS	Redacted email between Wayne MacFadden and the Parexel employer with whom he had an affair.	MacFadden Relationships
Macfadden 74	AZSER10375903-04	Email string – AstraZeneca project (12/22/2005) REDACTIONS	Redacted email between Wayne MacFadden and the Parexel employer with whom he had an affair. MacFadden forwarded an email he sent to a prospective author on a proposed suicidality publication for Seroquel.	MacFadden Relationships
Macfadden 75	AZSER10375876-79	Email string – last slide of this deck (01/12/2006) REDACTIONS	Redacted email between Wayne MacFadden and the Parexel employer with whom he had an affair.	MacFadden Relationships
Macfadden 76	AZSER10375604	Macfadden Email Re: Sunday hello (03/06/2005) REDACTIONS	Redacted email between Wayne MacFadden and the clinical researcher and author with whom he had an affair. In this email, MacFadden ridicules his colleagues.	MacFadden Relationships
Macfadden 77	AZSER10376063	Macfadden Email Re: Friday	Redacted email between Wayne MacFadden and the	MacFadden Relationships

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
		afternoon (12/05/2003) REDACTIONS	clinical researcher and author with whom he had an affair. In this email, MacFadden ridicules his colleagues.	
Macfadden 78	AZSER10375464	MacFadden Letter (undated) REDACTIONS	Redacted email between Wayne MacFadden and the clinical researcher and author with whom he had an affair discussing a crisis with some data in the bipolar depression manuscript which was to be published in the Am J Psych.	MacFadden Relationships

Kevin McKenna (05/15-05/16/2008) - VP, Regulatory Affairs, Neuroscience Therapeutic Area

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
McKenna 3	AZ/SER3778564; AZ/SER3778555-56	Email string – TALT Seroquel (10/23/2002)	Email string re a problem with the bipolar mania submission that McKenna claims not to recall. Email reads: "We're effing screwed!!!!"	Misc.
McKenna 16	SQ1ED00306039	Email string – Seroquel – John Patterson (01/03/2005)	Email from Gerald Limp that indicates Study 125 was designed for risk mitigation for the glucose utilization issue.	Diabetes
McKenna 17	SQ1P02656378	Discussion Document – Seroquel and Glucose dysregulation (06/2007)	This is a June 2007 Discussion Document prepared for a SERM meeting that led to the Changes Being Effected addition of safety data from Studies 125, 126 and 127 to the Adverse Reactions Hyperglycemia section of the Seroquel product label.	Diabetes
McKenna 18	F339-E10206690	Creation of Justification Documents to support CDS changes	This document addresses the issue of whether SERM Justification Documents should be used with regulatory authorities and the problems AZ has with the documents staying within the guidelines of the company's Standard Operating Procedures.	Misc.
McKenna 19	F339-E10206689	Email string – Format and content of Justification Documents (08/17/2005)	Email forwarding McKenna 10 to Kevin McKenna and others.	Misc.
McKenna 22		Seroquel Clinical Trial report summaries	List of clinical studies published on the AZ Clinical Trials website. At the time of the	Transparency/Concealing Data

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
			deposition, Studies 126 and 127 had not yet been posted to the website.	Diabetes
McKenna 24	SQ1ED01756187	Email string – Review of draft US Prescribing Information prior to the Rockville Meeting (11/16/2005)	Email string discussing the possibility of getting approval from the FDA to add to the Seroquel label that Seroquel reduces suicides. It includes the statement: “That said, we realize the data are not overwhelming and there is not a high likelihood of the acceptance by the FDA of this language. The team’s consensus, however, is to proceed, as we believe we a) pass the red-face test and are not making an unreasonable request to the FDA, b) are not trying to force any other data from any other secondary endpoint in the label and c) describing this in the label would be a major area of differentiation from other compounds used to treat bipolar d/o.”	Commercial/Sales
McKenna 25	N/A	Seroquel Package Insert	February 2008 Seroquel label	Misc.
McKenna 29	SQ1ED00164040	Presentation – “Seroquel and Glucose Dysregulation”	This presentation was made in Sweden in May of 2005. Pages 10 and 11 contain data from Studies 41 and 43 showing increases of mean and median plasma glucose above baseline. Pages 18 and 26 address Study 49 (BOLDER I) and suggest the glucose readings were not fasted.	Study 41 Diabetes
McKenna 30	SQ1ED00164042	Presentation – “Seroquel and Metabolic Syndrome”	This presentation was also made in Sweden in May of 2005.	Diabetes
McKenna 31	SQ1ED00164041	Presentation – “Weight change over 52 and 104 weeks – Schizophrenia Monotherapy”	This presentation was also made in Sweden in May of 2005.	Weight Gain
McKenna 32	SQ1ED00493270	McKenna Email Re: Draft TALT Meeting Minutes (10/30/2002)	Email forwarding McKenna 33	Misc.
McKenna 33	AZSER19853098-100	Minutes – CNS, P&I TALT Meeting (10/22/2002)	Minutes of the Therapeutic Area Leadership Team (TALT) where Jamie Mullen provided an	Misc.

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
			overview of the results of adjunct Trials 99 and 100 and monotherapy Trials 104 and 105 and proposed sNDA timelines.	
McKenna 36	SQ1ED00307053	Collated comments from global reviewers of CSR 49 draft (05/11/2005)	Comments on the Clinical Study Report for Study 49 (BOLDER I) in which Martin Brecher comments that the report portrays the safety profile for 300/d and 600/d in bipolar depression too favorably and that it is hard to say Seroquel is safe and well tolerated when 26% of the 600 mg group discontinued for adverse events.	Misc.

Jamie Mullen (11/01-11/02/2008) - Senior Director, Clinical Research

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Mullen 1	AZ/SER1270487	O'Brien Email Re: Seroquel Bipolar/Mania TAMT presentation (11/11/1999)	Email from Shawn O'Brien, Global Product Director, to the Therapeutic Area Management Team, advising that a bipolar mania indication could result in \$1 billion in sales.	Commercial/Sales
Mullen 3	AZ/SER7421644	Schwartz Email Re: Teleconference with Henry Nasrallah (11/17/2003)	Email re Schwartz's teleconference with Henry Nasrallah to seek his input on the Study 125 design/endpoints. Dr. Nasrallah suggested excluding patients who have a primary family member with diabetes.	Diabetes
Mullen 5	AZ/SER1683785	Email string – Reprints of Reinstein (01/25/2005)	Request for a "secret stash" of Reinstein reprints which are not supposed to be used anymore	Promotion – Weight Neutral Reinstein
Mullen 7	AZ/SER1721764-91	Presentation – "Seroquel study 125"	Clinical Development Team presentation on Study 125	Diabetes
Mullen 9	AZ/SER1158091-92	Trial 100 Global Commercial Strategy Summary (07/2003)	Data from Trial 99 and 100 cannot be used separately but must be pooled to attain	Pooling/Dredging/Spinning/ Mining Data

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
			certain efficacy claims	
Mullen 15	AZ/SER0582269-83	Presentation – “600 mg dose in Bipolar Depression” (06/01/2005)	This slide set describes different scenarios and evaluates their consequences for the brand (commercially) and for other ongoing clinical programs if the 600 mg dose of Seroquel fails to demonstrate an advantage of the 300 mg dose for bipolar depression.	Commercial/Sales Efficacy
Mullen 18	AZ/SER0745789	Stening Email Re: Target dose 600 mg (01/12/2005)	Email from Goran Stening, Leader of the Commercial Support Team, to AstraZeneca personnel regarding lack of evidence to support a target dose of 600 mg from Trial 43 (QUARTZ) which compared the safety, efficacy and tolerability of Seroquel and risperidone in patients with schizophrenia; "There is no evidence indicating that the high dose group performs better than the low dose group"	Efficacy
Mullen 30	N/A	Handwritten Chart – Influences on Doctor’s Knowledge	Attorney’s note attached as an exhibit during the deposition	Misc.
Mullen 33	N/A	“An Atypical Antipsychotic: Efficacy and Safety in a Multicenter, Placebo-Controlled Trial in Patients with Schizophrenia” – Borison (04/1996)	Publication of Study 12 by Richard Borison and Lisa Arvanitis	Borison/Diamond

Henry Nasrallah (06/04-06/05/2008) – Key Opinion Leader

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Nasrallah 6	N/A	“The Roles of Efficacy, Safety, and Tolerability in Antipsychotic Effectiveness” – Nasrallah (2007)	Nasrallah publication	Misc.
Nasrallah 11	N/A	“Impact of the CATIE Study in Clinical Practice” (07/2006)	Nasrallah publication	Misc.
Nasrallah 14	N/A	“Antipsychotic-Induced Type 2 Diabetes” – Gianfrancesco (08/2003)	Nasrallah publication	Misc.

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Nasrallah 18	N/A	"A review of the effect of atypical antipsychotics on weight" – Nasrallah (2003)	Nasrallah publication	Misc.
Nasrallah 19	N/A	"Efficacy, Safety & Tolerability of Quetiapine in Patients with Schizophrenia" – Nasrallah (2002)	Nasrallah publication	Misc.
Nasrallah 24	AZ/SER0638481-504	Atypical Antipsychotics: Patient Acceptance, Positive Outcomes	Nasrallah publication	Misc.

Alfred Paulson (06/20/2007) - Sales

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Paulson 6	AZ/SER3778912	Megabrand Voicemail	Announcing that Seroquel has become a "Megabrand" with over \$1 billion in sales	Megabrand

Charles Peipher (06/07/2007) - Marketing

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Peipher 15	N/A	AZ – Business Policies Partners in Policy		Business Policies
Peipher 16	N/A	AZ – Marketing & Sales Business Policies and Guidelines		Business Policies
Peipher 17	N/A	Policy on Promotional Activities REDACTIONS		Business Policies

Claudia Piano - Parexel (06/25/2008)

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Piano 17	AZ/SER4489971-72	Email string – Trial 104 Manuscript Ghaemi as co-author (02/19/2004)	Email re the request of Dr. Ghaemi, who was asked to be an author on the Trial 104 manuscript, for the study raw data. Ed Repp, the Seroquel Brand Leader, Life Cycle Product Manager, suggests dropping Dr. Ghaemi as an author.	Transparency/Concealing Data

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Piano 18	AZSER10145798	Email Re: APA 2006 abstracts have been submitted (12/02/2005)	Same as MacFadden 69.	Misc.
Piano 19	AZSER10375818	Email string – [redacted]'s picture (03/14/2006) REDACTIONS	Redacted email between Wayne MacFadden and the Parexel employer with whom he had an affair.	MacFadden relationships
Piano 20	SQ1ED02860927	Email string – NJ (08/17/2005) REDACTIONS	Redacted email between Wayne MacFadden and the Parexel employer with whom he had an affair.	MacFadden relationships
Piano 25	Parexel document	Goworek Email Re: REACH CME Meeting (04/13/2004)	REACH has been described as a steering committee of Key Opinion Leaders who would suggest educational programs to be funded by AZ.	Off Label
Piano 27	AZ/SER1610472-73	Hess Email Re: REACH Meeting Delegates (06/23/2003)	Suggests Seroquel is being marketed for the treatment of bipolar disorder before AZ received an indication for bipolar disorder.	Off Label

Michael Reinstein (05/28/2008; 11/05/2008) – Key Opinion Leader

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Reinstein 3	0129-0148	Reinstein Income from Zeneca/AZ	A list provided by Dr. Reinstein of payments made to him by AZ	Reinstein
Reinstein 7	N/A	FDA Clinical Investigator Inspection List – Reinstein	FDA website document showing Reinstein's clinical trial violations	Reinstein
Reinstein 8	N/A	Curriculum Vitae – Michael J. Reinstein, M.D. REDACTIONS	Current CV	Reinstein
Reinstein 20	F339-E05326923	Email string – Reinstein/Sonnenberg paper (12/12/2000)	Email re comparisons of high and low dose Seroquel	Reinstein
Reinstein 22	SQ1ED01256558	Email string – High Dose Seroquel Letter (12/16/2002)	Email string suggesting Reinstein deviated from a Seroquel study protocol making his results suspect	Reinstein
Reinstein 23	F339-E05326923	Email string – Reinstein/Sonnenberg paper	Email string suggesting Reinstein deviated	Reinstein

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
		(12/12/2000)	from a Seroquel study protocol making his results suspect	
Reinstein 26	SQ1ED00446381	Tugend Email Re: Reinstein Letter and my comments (10/30/2001)	Memo describing the background of Dr. Reinstein's letter to AZ CEO, David Brennan	Reinstein
Reinstein 36	AZ/SER6971518-28	Safety Position Paper – Seroquel – Diabetes Mellitus, Diabetic Ketoacidosis, Non-Ketotic Hyperosmolar Coma, and Hyperglycemia	This is the Geller Safety Position Paper that was sent to the Dutch regulatory authorities in 2000.	Dutch Submission Reinstein Diabetes
Reinstein 45	N/A	CD/DVD	CD of video clips on weight gain and diabetes. The transcript of the clips is Reinstein 46 which has not yet been de-designated by AZ as confidential.	Weight Gain Diabetes Reinstein

Athena Ruhl (11/07-11/08/2008) - Seroquel Senior Product Manager

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Ruhl 1		Curriculum Vitae – Athena M. Ruhl REDACTIONS		Misc.
Ruhl 2	AZSER10625287-90	Downes Memo Re: Seroquel Team List (07/04/1996)	List of various Seroquel team members	Misc.
Ruhl 10	AZSER10625683	Ruhl Memo Re: Seroquel Strike Force Meeting (06/11/1996)	Ruhl thanks Garren Foy, Market Research Manager, for putting together the Strike Force meeting on Seroquel and schizophrenia	Misc.
Ruhl 11	AZSER10615788	Email string – Brand classification (07/12/2002)	Mentions brand classifications. Slides are missing.	Megabrand
Ruhl 17	AZSER10612685-86	Sahl Email Re: Borison Reserve Press Statement (06/28/1996)	Press statement re Borison/Diamond	Borison/Diamond
Ruhl 19	AZSER10626757	Arvanitis Memo Re: US/Canada Investigator meeting and Study 15 (02/12/1997)	Memorandum from Lisa Arvanitis, Seroquel Project Physician, regarding the US/Canada	Study 15

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
			Investigator Meeting and Study 15	
Ruhl 21	AZSER10626028-36	Hancox Memo Re: Sercomed Minutes (08/21/1996)	Minutes of the 12th Serocomed Team Meeting; "We should only publish [Study 15] when the label is secure"	Study 15
Ruhl 33	AZSER10608285-306	Seroquel Strategic Plan 1997-2001 (07/01/1996) REDACTIONS	This document lists Opportunities including potential for use in adolescents and in the elderly on p. 14. It also describes Study 15 as a failed study on p. 17.	Off-label Pediatric Elderly Study 15 Commercial/Sales

Jack Schwartz (01/10-01/11/2008) - Executive Director, Seroquel Development

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Schwartz 7	AZSER10769859, 61	Seroquel Strategy Summary (12/18/2000) REDACTIONS	Key Success Factors: Broaden Seroquel use on and off label. Same as Brennan 8.	Off Label Pooling/Dredging/Spinning/ Mining Data Commercial/Sales
Schwartz 13	AZ/SER2562573-75	Email string – Quetiapine study (11/08/2004)	Email re Trial 31 investigator requesting study results	Transparency/Concealing Data
Schwartz 14	AZSER10258011-12	Email string – Trial 31 Position (12/15/2004)	Email re actions to be taken to respond to Trial 31 investigator's request	Transparency/Concealing Data
Schwartz 15	AZ/SER1592365-71	Email string – Trial 31 Position (12/17/2004)	Email string: (1) email from Jack Schwartz regarding the "trial 31 position" agenda item; (2) email from Margaret Melville regarding the development of AstraZeneca's Trial 31 position; (3) email from Wayne MacFadden, U.S. Medical Director for Seroquel, describing the results of Trial 31; and (4) email from Margaret Melville suggesting a shorter description of the Trial 31 results	Transparency/Concealing Data
Schwartz 16	AZ/SER6694344-46	Email string – Trial 31 Position	Email from Martin Brecher to Wayne	Transparency/Concealing Data

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
		(12/20/2004)	MacFadden, Margaret Melville, Jack Schwartz, Martin Jones, and others providing the abbreviated information to be given to the Trial 31 investigator Dr. Citrome, "a Lilly advocate"	
Schwartz 17	AZ/SER6496853-57	Melville Email Re: Seroquel Hyperglycaemia – proposed responses to MHLW (05/24/2002) REDACTIONS	Email string with Japanese marketing company re Seroquel and diabetes worldwide labeling history	Japanese Label Change Diabetes
Schwartz 18	N/A	Seroquel Clinical Trial report summaries	This is a print out of AZ's clinical trials website	Misc.
Schwartz 20	AZ/SER7015164-65	Email string – Effect of Seroquel on diabetes mellitus (07/29/2002)	Email to Japanese marketing company indicating the results from Trial 41 should be available at the end of August	Study 41 Japanese Label Change
Schwartz 21	AZ/SER7016902-03	Email string – Effect of Seroquel on diabetes mellitus (09/17/2002)	Email string between Martin Brecher and a member of the Japanese marketing company, Fujisawa, regarding Study 41 and the effect of Seroquel on diabetes mellitus	Study 41 Japanese Label Change
Schwartz 22	AZSER09580264-75	Melville Email Re: GPT delay in commenting to MHLW proposed JPI wording (10/23/2002) REDACTIONS	Email string between AZ and the Japanese marketing company about proposed diabetes labeling language	Study 41 Japanese Label
Schwartz 23	AZ/SER1601607-23	Presentation – “Labeling Change in Japan” (01/21/2003) REDACTIONS	Presentation providing the background on the label change	Japanese Label Change Diabetes
Schwartz 26	AZ/SER7301334-36	Email string – Puerto Rico Summary (01/02/2003)	Email re glucose monitoring requirements for Trial 125	Diabetes
Schwartz 27	AZ/SER3749959	Schwartz Email Re: Seroquel US Brand Team Concerns Regarding Trial 125 (06/03/2003)	Email from Jack Schwartz to Alex Oldham regarding US Brand Team concerns about Study 125 - "Brand Team doesn't understand the strategic drivers for study	Commercial/Sales Diabetes

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
			125."	
Schwartz 35	AZ/SER3673695	Schwartz Email Re: Trial 125 (08/06/2003)	Contemplating Study 125 endpoints based on potential adverse effects on US sales	Commercial/Sales Diabetes
Schwartz 40	AZ/SER3734140-41	Memo Re: Special Award for BOLDER Team (03/20/2004)	Announcing cash awards for the BOLDER team	Misc.
Schwartz 49	AZ/SER7231013; AZ/SER1080636-39	Duff Email Re: Rosenheck VA article #2 and objection handler (09/03/2002)	Objection Handler for the Leslie's VA study "which paints Seroquel in a negative light." The email and objection handler instructs sales reps not to proactively discuss the study with customers.	Commercial/ Sales Diabetes
Schwartz 51	AZ/SER5484344-45	Email string – Clinical Studies Opportunities (10/24/2004)	Email string wherein Jack Schwartz states that Study 125 is not a diabetes trial.	Diabetes

Tony Zook (06/06/2008) - President and CEO of AstraZeneca US (2006 to present); Senior VP, Commercial Operations (2001-2006); VP Marketing & Sales (1997-2001)

Exhibit	Bates/ Control Number	Document Description	Comments	Subject Matter
Zook 1		Curriculum Vitae – Tony P. Zook		Misc.