

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: ZOLOFT (SERTRALINE
HYDROCHLORIDE) PRODUCTS LIABILITY
LITIGATION**

MDL No. 2342

2:12-md-02342-CMR

**THIS DOCUMENT RELATES TO ALL
ACTIONS:**

HON. CYNTHIA M. RUFÉ

**PLAINTIFFS' NOTICE OF TAKING VIDEOTAPED DEPOSITION OF PFIZER,
INC.'s AND GREENSTONE LLC's PERSON(S) MOST KNOWLEDGEABLE
PURSUANT TO F.R.C.P. 30(b)(6)**

TO DEFENDANT PFIZER, INC. AND DEFENDANT GREENSTONE LLC AND
THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiffs, by and through their counsel of record, will take the deposition of Defendants Pfizer, Inc. (hereinafter "Pfizer") and Greenstone LLC (hereinafter "Greenstone"), pursuant to Fed. R. Civ. P. 30(b)(6) in the above action, to begin on December 19, 20 and 21, 2012, at 10:00 a.m. Eastern Standard Time, at Skadden, Arps, Slate, Meagher & Flom LLP, Four Times Square, New York, NY 10036. The deposition shall be taken stenographically, conducted under the supervision of an officer who is authorized to administer an oath, and be video recorded.

Pursuant to Fed. R. Civ. P. 30(b)(6), Defendants Pfizer and Greenstone must designate and produce at the deposition one or more "officers, directors, or managing agents, or other

persons who consent to testify” and who possess sufficient knowledge to testify as to the matters listed below for examination.

PLEASE TAKE FURTHER NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(3), Plaintiffs intend to utilize a stenographic method of recording which permits the “real time” instant visual display of testimony.

PLEASE ALSO TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(3)(A), the deposition testimony will be recorded by stenographic and audiovisual means. The deposition will be videotaped and Plaintiffs reserve the right to use at the trial of this action the video recording of the deposition.

PLEASE ALSO TAKE NOTICE that, pursuant to Fed. R. Civ. P. 34, Plaintiffs also request the documents set forth below within the next thirty (30) days or at the deposition, whichever is sooner.

DEFINITIONS AND INSTRUCTIONS

The following definitions apply to this Notice of Deposition and are deemed to be incorporated into each subject listed below:

1. “Pfizer,” “Pfizer, Inc.,” “You,” “Your,” or Defendant refers to Defendants Pfizer, Inc., and its subsidiaries, Pfizer LLC, Pfizer Pharmaceutical LLC and Pfizer International LLC (including Roerig) and Defendant Greenstone LLC, and all Defendants’ partners, directors, officers, employees, servants, agents, attorneys, joint ventures, or other representatives, including all corporations and entities affiliated with Pfizer. “Roerig” refers to defendant Roerig & Co. The terms shall also include all predecessor business entities, as well as any predecessor’s partners, directors, officers, employees, servants, agents, joint ventures, or others acting on their behalf. The terms shall also include all foreign subsidiaries or foreign

parent companies, as well as any foreign subsidiaries' or parent companies' partners, directors, officers, employees, servants, agents, joint ventures or others acting on their behalf.

2. "Zoloft" means the drug Zoloft, Sertraline Hydrochloride, and any predecessor or non-final derivation of the drug that later became Zoloft. Also included in the definition of Zoloft are any chemical equivalents marketed in foreign countries.

3. "Documents" as used herein is coextensive with the meaning of the term "documents" and "tangible things" and shall have the broadest possible meaning and interpretations ascribed to the terms "documents" and "tangible things." Consistent with the above definition, the terms shall include, without limitation, any written, printed, typed, photostatic, photographed, recorded, computer-generated, computer stored, or otherwise maintained or reproduced communication or representation, any data compilation in any form, whether comprised of letters, words, numbers, pictures, sounds, bytes, e-mails, electronic signals or impulses, electronic data, active files, deleted files, file fragments, or any combination thereof including, without limitation, all memoranda, notes, records, letters, envelopes, telegrams, messages, studies, analyses, contracts, agreements, projections, estimates, working papers, accounts, analytical records, reports and/or summaries of investigations, opinions or reports of consultants, opinions or reports of experts, opinions or reports of accountants, other reports, trade letters, press releases, comparisons, books, diaries, articles, magazines, newspapers, booklets, brochures, pamphlets, circulars, bulletins, notices, forecasts, drawings, diagrams, instructions, minutes of meetings or communications of any type, including inter- and intra-office communications, questionnaires, surveys, charts, graphs, all other compiled data, documents maintained on, stored in or generated on any electronic transfer or storage system, any preliminary versions, drafts, or revisions of any kind of the

foregoing now in the possession, custody or control of you, or the former or present directors, officers, counsel, agents, employees, partners, consultants, principles, and/or persons acting on your behalf.

4. “Electronically stored information” (hereinafter “ESI”) is used herein as it is defined under Federal Rules of Civil Procedure, Rules 26 and 34.

5. “Relating to,” “relate to,” “referring to,” “refer to,” “reflecting,” “reflect,” “concerning,” or “concern” shall mean evidencing, regarding, concerning, discussing, embodying, describing, summarizing, containing, constituting, showing, mentioning, reflecting, pertaining to, dealing with, relating to, referring to in any way or manner, or in any way logically or factually, connecting with the matter described in that paragraph, including documents attached to or used in the preparations of or concerning the preparation of the documents.

6. “You” and “your” mean Pfizer (including Roerig) and Greenstone and any of their subsidiaries, affiliates, officers, sales representatives, accountants, agents, attorneys, employees, representatives, or others acting on its behalf.

7. “Or” and “and” will be used interchangeably.

8. Unless otherwise indicated, the “relevant period” for the information sought is from 1975 or the date Pfizer and/or Greenstone first started developing Zoloft/sertraline hydrochloride (whichever is earlier) until the present. “Zoloft” shall refer to Zoloft and Sertraline Hydrochloride.

9. “Foreign pharmaceutical regulatory bodies” means any organization including, but are not limited to, the pharmaceutical regulatory bodies and agencies in countries other than the United States.

10. Each deponent is instructed to produce at the deposition: copies of any and all documents reviewed or read upon in preparation for the deposition; copies of any and all documents or tangible things related to or referring to the subjects listed in this notice contained in the deponent's files, papers, or other materials; and a copy of his/her resume or C.V.

11. "Native Electronic Format" shall mean and refer to the state of an electronic file as it originally existed or as it was originally created on any and all computers, electronic media devices, networks or any other locations where data may be stored (including back-up servers, deleted folders, hidden folders, etc.), with all of the file's original metadata intact, meaning that the metadata fields have not been altered, deleted, updated or modified in any way.

DEPOSITION SUBJECT MATTER

Pursuant to Federal Rules of Civil Procedure, Rule 30(b)(6), the deponent must have knowledge and shall be able to testify concerning the following subject matters:

1. The names and identities of the past and present organizational structures of Pfizer/Greenstone, including departments, divisions, subdivisions, teams, and individuals (excluding clerical personnel), relating to the Zolofit/sertraline hydrochloride electronically stored information/databases (ESI native with meta-data preservation); marketing/market research; sales/medical information; regulatory; safety (animal studies, clinical studies); labeling; corporate organization/corporate compliance; and pharmaco-vigilance (PSURs/post-marketing, AERs, publications) from the time first developed until the present.

DOCUMENT REQUESTS TO DEFENDANTS PFIZER AND GREENSTONE

Please produce:

1. All documents reviewed by the deponent in preparing for this deposition.
2. All documents concerning corporate, departmental, and employee organizational charts.
3. All documents concerning your protocol or standard operating procedures (SOP) regarding the following departments, divisions, subdivisions, teams and individuals:
 - a. Pfizer/Greenstone Interaction;
 - b. Electronically stored information/databases (ESI native with meta-data preservation);
 - c. Marketing/market research;
 - d. Sales/medical information;
 - e. Regulatory;
 - f. Safety (animal studies, clinical studies);
 - g. Labeling;
 - h. Corporate organization/corporate compliance;
 - i. Pharmaco-vigilance (PSURs/post-marketing, AERs, publications).

Dated: November 15, 2012

Respectfully Submitted,

/s/ Mark P. Robinson, Jr.
Mark P. Robinson, Jr.
ROBINSON CALCAGNIE ROBINSON
SHAPIRO DAVIS, INC.
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/s/ Dianne M. Nast, Esq.
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dnast@rodanast.com

PLAINTIFFS CO-LEAD COUNSEL

CERTIFICATE OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 19 Corporate Plaza Drive, Newport Beach, CA 92660.

On November 15, 2012, I served the foregoing document described as:

Plaintiffs' Notice Of Taking Videotaped Deposition Of Pfizer, Inc.'s and Greenstone LLC's Person(s)

Most Knowledgeable Pursuant To F.R.C.P. 30(b)(6)

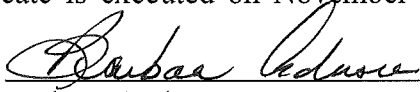
on the following person(s) in the manner indicated:

SEE ATTACHED SERVICE LIST

(BY ELECTRONIC TRANSMISSION) I served electronically from the electronic notification address of banderson@rcrlaw.net the document described above and a copy of this declaration to the person and at the electronic notification address set forth herein. The electronic transmission was reported as complete and without error.

(FEDERAL) I declare that I am employed in the offices of a member of this Court at whose direction the service was made.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Certificate is executed on November 15, 2012, at Newport Beach, California.



Barbara Anderson

SERVICE LIST

<p>Mark S. Cheffo, Esq. Skadden, Arps, Slate, Meagher & Flom LLP Four Times Square New York, NY 10036 Telephone: 212 735-3000 Facsimile: 212 735-2000 Mark.cheffo@skadden.com</p> <p>Attorney for Defendants Pfizer Inc. and Greenstone LLC</p> <p>Defendants' Liaison Counsel Defendants' Lead Counsel</p>	<p>Dianne M. Nast, Esq. NastLaw LLC 1101 Market Street Aramark Tower Suite 2801 Philadelphia, Pennsylvania 19107 Phone 215 923 9300 Fax 215 923 9303</p> <p>Plaintiffs' Co-Lead Counsel</p>
<p>Stephen A. Corr, Esq. 509 Starflower Street Warrington, PA 18976-1676 Tele: 610 482 4237 stevecorr20@verizon.net</p> <p>Plaintiffs' Liaison Counsel</p>	<p>Mark P. Robinson, Jr., Esq. Robinson Calcagnie Robinson Shapiro Davis, Inc. 19 Corporate Plaza Newport Beach, CA 92660 Tele: 949 720-1288 Fax: 949-720-1292 Beachlawyer51@hotmail.com</p>