

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. “You,” “Your,” or Defendant refers to 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 Greenstone LLC. 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” means Greenstone LLC and any of its 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, Inc. 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 past and present organizational structures of Greenstone LLC, including departments, divisions, subdivisions, teams, and individuals (excluding clerical personnel).
2. The names, job titles, job descriptions and responsibilities of all present and former Greenstone LLC employees involved in the development, production, marketing or sale of Zoloft or Sertraline Hydrochloride.
3. The existence and location of any documents, records or writings relating to the development, production, marketing or sale of Zoloft or Sertraline Hydrochloride, and the manner in which such documents, records or writings are prepared, received, recorded and kept in the usual course of business including, but not limited to, 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 pharmacovigilance (PSURs/post-marketing, AERs, publications) from the time first developed until the present.

4. The relationship between Pfizer, Inc and Greenstone LLC including, but not limited to, all communications between Pfizer, Inc and Greenstone LLC which in any way relate to the development, production, marketing or sale of generic versions of Pfizer products.

5. All communications between Pfizer, Inc and Greenstone LLC which in any way relate to the development, production, marketing or sale of Zoloft or Sertraline Hydrochloride.

6. Any NDA or ANDA submitted or prepared by Greenstone LLC at any time relating to Zoloft or Sertraline Hydrochloride including, but not limited to, all submissions to, and correspondence with, the FDA.

7. The manufacture and development of Zoloft or Sertraline Hydrochloride including, but not limited to, any correspondence, memoranda, tests, notes, communications, articles, abstracts, reports, or any other records relating to development, manufacturing specifications, safety analysis or research, alternatives considered, standards utilized or considered, or risks and benefits considered.

8. The use, intended uses, foreseeable uses and misuses of Zoloft or Sertraline Hydrochloride including, but not limited to, the development, production or provision of any instructions, labels, package inserts, warnings or any other written material provided to sales personnel, physicians, pharmacists, users or purchasers of Zoloft or Sertraline Hydrochloride.

9. Any studies, testing, research, analysis, inquiries, articles, literature or any other information from any source regarding actual or potential adverse reactions, events or

experiences involving the use of Zoloft or Sertraline Hydrochloride including, but not limited to, cardiac defects, neural-tube defects, persistent pulmonary hypertension, limb defects, craniosynostosis, abdominal birth defects, cleft lip or palate, fluid and electrolyte disturbances, musculoskeletal, gastrointestinal, dermatologic, neurological, endocrine, ophthalmic or metabolic reactions.

10. Any studies, testing, research, analysis, inquiries, articles, literature or any other information from any source which relates to interactions of Zoloft or Sertraline Hydrochloride with other drugs, or relating to enhanced effects caused by use of other drugs in conjunction with Zoloft or Sertraline Hydrochloride .

11. Any testing, studies, research or analysis performed by anyone for the purpose of evaluating the effects of, adverse reactions to, or drug interactions involving, the use of Zoloft or Sertraline Hydrochloride, including, but not limited to, animal testing, testing in human beings, laboratory testing, or any other type of studies, research or analysis.

12. Any correspondence or communication between Greenstone LLC and Pfizer, the FDA or any other foreign or domestic government agency relating to the production, sale or marketing of Zoloft or Sertraline Hydrochloride including, but not limited to, any communications relating to safety, efficacy, or adverse events or experiences.

13. All information and data from any source utilized or relied upon by anyone in the preparation and development of all Physician's Desk Reference entries for Zoloft or Sertraline Hydrochloride or any product containing Zoloft or Sertraline Hydrochloride from 1991 to the present including, but not limited to, product description, actions, indications, contraindications, warnings, precautions, adverse reactions, dosage and administration.

14. Any complaint, communication, information or notification of any type from any source concerning any alleged adverse reaction or injury actually or allegedly caused by the use of any product containing Zoloft or Sertraline Hydrochloride including, but not limited to, results of studies, research, tests, articles, literature, lawsuits, alleged injuries, injury claims, or any other documents, records, correspondence or communications.

15. All changes made to any Physician's Desk Reference entries for any product containing Zoloft or Sertraline Hydrochloride from 1991 to the present including, but not limited to, product description, actions, indications, contraindications, warnings, precautions, adverse reactions, dosage and administration, any communications or correspondence between anyone concerning same, and all reasons for any such changes.

16. All changes made to instructions, labels, package inserts, warnings or any other written material provided to physicians, pharmacists, users or purchasers of any product containing Zoloft or Sertraline Hydrochloride, between 1991 and the present.

17. The sale or marketing of any product containing Zoloft or Sertraline Hydrochloride including, but not limited to, advertisements in any form, brochures, marketing programs, sales records, marketing surveys, market research, articles, printed sales materials, instructions or information provided to anyone, physicians or the public, and any correspondence, communications, notes, memoranda or records.

18. Any communication, correspondence, discussion, documentation or information relating to Zoloft or Sertraline Hydrochloride including, but not limited to, any application to the FDA under 21 U. S. C. §355(j), the safety and efficacy of the drug, the accuracy and adequacy of safety and efficacy labeling, and the equivalence to any reference listed drug.

19. Any communication, correspondence, discussion, documentation or information relating to the adequacy, accuracy or effectiveness of the warnings, instructions and/or labeling for Zoloft or Sertraline Hydrochloride.

20. Any communication, correspondence, discussion, documentation or information relating to the adequacy or effectiveness of the means of communicating to physicians, consumers and the medical community the information contained in the warnings, instructions and/or labeling for Zoloft or Sertraline Hydrochloride.

21. Any communication, correspondence, discussion, documentation or information relating to any alternative means of communicating to physicians, consumers and the medical community any of the information contained in the warnings, instructions and/or labeling for Zoloft or Sertraline Hydrochloride including, but not limited to, DHCP letters consistent with 21 CFR §201.100(d)(1), or any other form of publication or notice.

DOCUMENT REQUESTS TO DEFENDANT GREENSTONE LLC

IT IS FURTHER REQUESTED, pursuant to F.R.C.P. Rule 34 and 30(b)(2), that said deponent produce at the time of deposition each and every document, record, writing, paper, book, account, letter, photograph, object or other tangible thing in your custody or control which relates to or reflects the following:

1. Each and every document, record or writing which relates to or reflects the past and present organizational structures of Greenstone LLC, including departments, divisions, subdivisions, teams, and individuals (excluding clerical personnel).

2. Each and every document, record or writing which relates to or reflects the names, job titles, job descriptions and responsibilities of all present and former Greenstone

employees involved in the development, production, marketing or sale of Zoloft or Sertraline Hydrochloride.

3. Each and every document, record or writing which relates to or reflects the existence and location of any documents, records or writings relating to the development, production, marketing or sale of Zoloft or Sertraline Hydrochloride, and the manner in which such documents, records or writings are prepared, received, recorded and kept in the usual course of business including, but not limited to, 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 pharmacovigilance (PSURs/post-marketing, AERs, publications) from the time first developed until the present.

4. Each and every document, record or writing which relates to or reflects the relationship between Pfizer, Inc and Greenstone LLC including, but not limited to, all communications between Pfizer, Inc and Greenstone LLC which in any way relate to the development, production, marketing or sale of generic versions of Pfizer products.

5. Each and every document, record or writing which relates to or reflects all communications between Pfizer, Inc and Greenstone LLC which in any way relate to the development, production, marketing or sale of Zoloft or Sertraline Hydrochloride.

6. Each and every document, record or writing which relates to or reflects any NDA or ANDA submitted or prepared by Greenstone LLC at any time relating to Zoloft or Sertraline Hydrochloride including, but not limited to, all submissions to, and correspondence with the FDA.

7. Each and every document, record or writing which relates to or reflects the manufacture and development of Zoloft or Sertraline Hydrochloride including, but not limited to, any correspondence, memoranda, tests, notes, communications, articles, abstracts, reports, or any other records relating to development, manufacturing specifications, safety analysis or research, alternatives considered, standards utilized or considered, or risks and benefits considered.

8. Each and every document, record or writing which relates to or reflects the use, intended uses, foreseeable uses and misuses of Zoloft or Sertraline Hydrochloride including, but not limited to, the development, production or provision of any instructions, labels, package inserts, warnings or any other written material provided to sales personnel, physicians, pharmacists, users or purchasers of Zoloft or Sertraline Hydrochloride.

9. Each and every document, record or writing which relates to or reflects any studies, testing, research, analysis, inquiries, articles, literature or any other information from any source regarding actual or potential adverse reactions, events or experiences involving the use of Zoloft or Sertraline Hydrochloride including, but not limited to, cardiac defects, neural-tube defects, persistent pulmonary hypertension, limb defects, craniosynostosis, abdominal birth defects, cleft lip or palate, fluid and electrolyte disturbances, musculoskeletal, gastrointestinal, dermatologic, neurological, endocrine, ophthalmic or metabolic reactions.

10. Each and every document, record or writing which relates to or reflects any studies, testing, research, analysis, inquiries, articles, literature or any other information from any source which relates to interactions of Zoloft or Sertraline Hydrochloride with other drugs, or relating to enhanced effects caused by use of other drugs in conjunction with Zoloft or Sertraline Hydrochloride .

11. Each and every document, record or writing which relates to or reflects any testing, studies, research or analysis performed by anyone for the purpose of evaluating the effects of, adverse reactions to, or drug interactions involving, the use of Zoloft or Sertraline Hydrochloride, including, but not limited to, animal testing, testing in human beings, laboratory testing, or any other type of studies, research or analysis.

12. Each and every document, record or writing which relates to or reflects any correspondence or communication between Greenstone LLC and Pfizer, the FDA or any other foreign or domestic government agency relating to the production, sale or marketing of Zoloft or Sertraline Hydrochloride including, but not limited to, any communications relating to safety, efficacy, or adverse events or experiences.

13. Each and every document, record or writing which relates to or reflects all information and data from any source utilized or relied upon by anyone in the preparation and development of all Physician's Desk Reference entries for Zoloft or Sertraline Hydrochloride or any product containing Zoloft or Sertraline Hydrochloride from 1991 to the present including, but not limited to, product description, actions, indications, contraindications, warnings, precautions, adverse reactions, dosage and administration.

14. Each and every document, record or writing which relates to or reflects any complaint, communication, information or notification of any type from any source concerning any alleged adverse reaction or injury actually or allegedly caused by the use of any product containing Zoloft or Sertraline Hydrochloride including, but not limited to, results of studies, research, tests, articles, literature, lawsuits, alleged injuries, injury claims, or any other documents, records, correspondence or communications.

15. Each and every document, record or writing which relates to or reflects all changes made to any Physician's Desk Reference entries for any product containing Zoloft or Sertraline Hydrochloride from 1991 to the present including, but not limited to, product description, actions, indications, contraindications, warnings, precautions, adverse reactions, dosage and administration, any communications or correspondence between anyone concerning same, and all reasons for any such changes.

16. Each and every document, record or writing which relates to or reflects all changes made to instructions, labels, package inserts, warnings or any other written material provided to physicians, pharmacists, users or purchasers of any product containing Zoloft or Sertraline Hydrochloride, between 1991 and the present.

17. Each and every document, record or writing which relates to or reflects the sale or marketing of any product containing Zoloft or Sertraline Hydrochloride including, but not limited to, advertisements in any form, brochures, marketing programs, sales records, marketing surveys, market research, articles, printed sales materials, instructions or information provided to anyone, physicians or the public, and any correspondence, communications, notes, memoranda or records.

18. Each and every document, record or writing which relates to or reflects any communication, correspondence, discussion, documentation or information relating to Zoloft or Sertraline Hydrochloride including, but not limited to, any application to the FDA under 21 U. S. C. §355(j), the safety and efficacy of the drug, the accuracy and adequacy of safety and efficacy labeling, and the equivalence to any reference listed drug.

19. Each and every document, record or writing which relates to or reflects any communication, correspondence, discussion, documentation or information relating to the

adequacy, accuracy or effectiveness of the warnings, instructions and/or labeling for Zoloft or Sertraline Hydrochloride.

20. Each and every document, record or writing which relates to or reflects any communication, correspondence, discussion, documentation or information relating to the adequacy or effectiveness of the means of communicating to physicians, consumers and the medical community the information contained in the warnings, instructions and/or labeling for Zoloft or Sertraline Hydrochloride.

21. Each and every document, record or writing which relates to or reflects any communication, correspondence, discussion, documentation or information relating to any alternative means of communicating to physicians, consumers and the medical community any of the information contained in the warnings, instructions and/or labeling for Zoloft or Sertraline Hydrochloride including, but not limited to, DHCP letters consistent with 21 CFR §201.100(d)(1), or any other form of publication or notice.

Dated: December 21, 2012

Respectfully Submitted,

/s/ Mark P. Robinson, Jr.
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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 December 21, 2012, I served the foregoing document described as:
Plaintiffs' Notice Of Taking Videotaped Deposition Of
Defendant Greenstone LLC 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 December 21, 2012, at Newport Beach, California.


Barbara Anderson
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, PA 19107 Telephone: (215) 923-9300 Fax: (215) 923-9303</p> <p>Plaintiffs' Co-Lead Counsel</p>
<p>Stephen A. Corr, Esq. Stark & Stark 777 Township Line Road, Suite 120 Yardley, PA 19067-5559 T: 267.759.9684 F: 267.907.9659 C: 215.450.5320 Assistant: Jensen Bucher E-mail: SCorr@Stark-Stark.com</p> <p>Plaintiffs' Liaison Counsel</p>	<p>Mark P. Robinson, Jr. Robinson Calcagnie Robinson Shapiro Davis Inc 19 Corporate Plaza Drive Newport Beach, CA 92660 Tele: (949) 720-1288 Fax: (949) 720-1292 Beachlawyer51@hotmail.com</p> <p>Plaintiffs' Co-Lead Counsel</p>