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. RUFE**

PLAINTIFFS' NOTICE OF TAKING VIDEOTAPED DEPOSITION OF PFIZER INC.'S PERSON(S) MOST KNOWLEDGEABLE PURSUANT TO F.R.C.P. 30(b)(6) RE PHARMACOVIGILANCE AND REQUEST FOR PRODUCTION OF DOCUMENTS

TO DEFENDANT PFIZER, INC. 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 the Person(s) Most Knowledgeable re Pharmacovigilance of Defendants Pfizer, Inc. (hereinafter "Pfizer") pursuant to Fed. R. Civ. P. 30(b)(6) in the above action, on July 25, 2013, at 9:30 a.m. Eastern Standard Time, at Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, 22nd Floor, New York, NY 10010. The deposition, if not completed on the noticed date, shall be continued, if necessary, from day to day thereafter, excluding weekends and holidays, until completed, unless counsel for the noticing party wishes the deposition to be completed at a later date, in which case a mutually agreeable date shall be selected between counsel for the parties. 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), Defendant Pfizer 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 on Exhibit "A" 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 on Exhibit "B" within the next thirty (30) days or at the deposition, whichever is sooner.

Dated: June 8, 2013

Respectfully Submitted,

/s/ Mark P. Robinson, Jr.
Mark P. Robinson, Jr.
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PLAINTIFFS CO-LEAD COUNSEL

EXHIBIT "A"

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 subject matters listed below. For all issues, the Relevant Time is from the initial research and development of sertraline through trial:

1. The identity, staffing, and function of personnel, departments and groups within Pfizer who are responsible for risk assessment, pharmacovigilance and labeling pertaining to sertraline.

2. Pfizer's past and current clinical safety and pharmacovigilance practices, including signal detection and adverse event reporting to regulatory bodies.

3. The creation and location of all efficacy and safety information (including identification of all databases and document repositories during the Relevant Time) concerning sertraline, including, but not limited to, information regarding sertraline's pharmacokinetic properties, safe and effective duration of use of sertraline, safe and effective dosing of sertraline, safe and effective drug-drug interactions, safe and effective drug-disease relationships, all animal and human data, literature (whether published or not), observational data, adverse events, labels, case studies and case reports.

4. Pfizer's monitoring, collection, review, analysis, and reporting of human and animal data, literature, observational studies or data, case series, case reports, labels, and adverse events related to sertraline and other SSRIs and adverse pregnancy and/or birth outcomes.

5. Pfizer's decisions during the Relevant Time regarding the existence of a signal or lack of a signal for adverse pregnancy and/or birth outcomes related to sertraline use and Pfizer's internal and external communication of those decisions, including all information, literature, data, processes, studies, testing, focus groups, marketing studies, key opinion leaders communications, scientific information, and information generated by third parties that was reviewed by Pfizer in making and communicating its decisions.

6. Pfizer's decisions during the Relevant Time regarding the association or lack of association between sertraline and adverse pregnancy and/or birth outcomes and Pfizer's internal and external communication of those decisions,

including all information, literature, data, processes, studies, testing, focus groups, marketing studies, key opinion leaders communications, scientific information, and information generated by third parties that was reviewed by Pfizer in making and communicating its decisions.

7. Pfizer's decisions during the Relevant Time regarding the causal association or lack of causal association between sertraline and adverse pregnancy and/or birth outcomes and Pfizer's internal or external communication of those decisions, including all information, literature, data, processes, studies, testing, focus groups, marketing studies, key opinion leaders communications, scientific information, and information generated by third parties that was reviewed by Pfizer in making and communicating its decisions.

8. Pfizer's decisions during the Relevant Time regarding making a change to the sertraline label or choosing not to make a change to the sertraline label regarding adverse pregnancy and/or birth outcomes related to sertraline and Pfizer's internal or external communication of those decisions, including all information, literature, data, processes, studies, testing, focus groups, marketing studies, key opinion leaders communications, scientific information, and information generated by third parties that was reviewed by Pfizer in making and communicating its decisions.

9. Pfizer's choices regarding the classification, grouping, coding, and pooling of adverse events, and its internal and external communications of those choices, including all scientific and other bases supporting the methodologies chosen by Pfizer to do so.

10. Pfizer's decisions that the risks of sertraline use are outweighed by its benefits and Pfizer's internal or external communication of those decisions, including all information, literature, data, processes, studies, testing, focus groups, marketing studies, key opinion leaders communications, scientific information, and information generated by third parties that was reviewed by Pfizer in making and communicating its decisions.

11. Pfizer's choice of language to communicate the risks and benefits of sertraline, including all information, literature, data, processes, studies, testing, focus groups, marketing studies, key opinion leaders communications, scientific information, and information generated by third parties that was reviewed by Pfizer in choosing the language.

12. All scientific and data gathering activities relating to the detection, assessment, understanding, and prevention of adverse effects or any other product-related problems for sertraline.

13. Pfizer's efforts to reduce or manage risks of sertraline once the product was marketed.

14. Pfizer's evaluation and consideration of new safety information for sertraline that became available through the use of sertraline domestically or in other countries; through use of other drugs in the same class; from pharmacologic studies; and from controlled clinical trials.

15. Pfizer's implementation of a pharmacovigilance plan for the ongoing evaluation of safety signals identified with the use of sertraline.

16. Pfizer's efforts to identify, follow-up, influence, document, and acquire complete data from spontaneous adverse event reports involving sertraline, including adverse event details, baseline patient characteristics, therapy details, time to onset of signs or symptoms, dose-response, diagnosis of the event, clinical course of the event, outcomes, concomitant drug use, and laboratory data.

17. Pfizer's internal communication of pharmacovigilance and risk information, including, the identity of personnel who communicate and receive such information (including management, board members, executives, and other thought leaders at Pfizer), when the information is communicated, how the information is communicated and where the communications are stored.

18. The reporting of sertraline safety information, including adverse events and signals to the FDA and foreign regulatory bodies.

19. The evaluation and consideration of risk assessment limitations concerning sertraline including validity, accuracy, timeliness, representativeness, statistical significance, and biases.

20. U.S. and world-wide product labeling for sertraline, including the Core Data Sheet.

EXHIBIT "B"

REQUEST FOR DOCUMENTS

The items to be produced by the deponent at this deposition are as follows:

1. Current resume and curriculum vitae.

2. Complete copies of all professional or occupational licenses or credentials held in deponent's field(s) of specialization, or if unavailable, then listing thereof with all pertinent information.

3. Copy of all publications, books, articles, etc., authored by deponent, alone or in collaboration. Only if copies are not available, deponent then shall produce a bibliographic listing of all such publications, books and articles.

4. Deponent's complete custodial file (including all e-mail) related to Pfizer's review of data regarding the association or lack of association between sertraline and adverse pregnancy outcomes.

5. Deponent's complete custodial file (including all e-mail) related to adverse birth outcomes pertaining to Zoloft, including but not limited to all meeting minutes from any Risk Management Committee (RMC) meetings and any meetings regarding world-wide labeling for sertraline.

6. Deponent's complete custodial file (including all e-mail) related the collection and analysis of data related to pharmacovigilance regarding sertraline, pregnancy, and adverse birth outcomes.

7. Deponent's complete custodial file (including all e-mail) related the collection and reporting of adverse events related to the use of sertraline, including the use of sertraline during pregnancy.

8. Deponent's complete custodial file (including all e-mail) related to Pfizer's past and current clinical safety and pharmacovigilance practices, including adverse event reporting to regulatory bodies.

9. A copy of all documents reviewed by deponent in preparation for his deposition.

10. A copy of all documents prepared by deponent in preparation for his deposition.

11. Deponent's complete custodial file (including all e-mail) regarding or relating to Zoloft and Birth Defects and/or birth outcomes.

12. All Ad Hoc Safety reports related to sertraline.

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 June 8, 2013, I served the foregoing document described as:
PLAINTIFFS' NOTICE OF TAKING VIDEOTAPED DEPOSITION OF PFIZER INC.'S PERSON(S) MOST KNOWLEDGEABLE PURSUANT TO F.R.C.P. 30(b)(6) RE PHARMACOVIGILANCE AND REQUEST FOR PRODUCTION OF DOCUMENTS
on the following person(s) in the manner indicated:

SEE ATTACHED SERVICE LIST

[X] (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.

[X] (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 June 8, 2013, at Newport Beach, California.

Barbara Anderson

SERVICE LIST

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