

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

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<b>IN RE: ZOLOFT (SERTRALINE HYDROCHLORIDE) PRODUCTS LIABILITY LITIGATION</b>	:	<b>MDL No. 2342</b>
	:	
	:	<b>2:12-md-02342-CMR</b>
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	:	
<b>THIS DOCUMENT RELATES TO ALL ACTIONS</b>	:	<b>HON. CYNTHIA M. RUFE</b>
	:	
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**PLAINTIFFS' SUPPLEMENTAL NOTICE OF TAKING VIDEOTAPED DEPOSITION  
OF PIERRE RAILLARD AND REQUEST FOR PRODUCTION OF DOCUMENTS**

TO DEFENDANTS 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, supplement their deposition notice of Pierre Raillard in the above action, for the deposition to take place on September 18, 2013, at 9:00 a.m., Central European Time, at Quinn Emanuel Urquhart & Sullivan, LLP, 25 rue Balzac, 75008 Paris, France. 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.

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.

**DOCUMENT REQUESTS**

Please produce:

1. Copies of any and all documents reviewed or relied upon by the deponent in preparation for the deposition.
2. 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.
3. The custodial file for Pierre Raillard.
4. Pierre Raillard's CV.
5. Communications while he was a safety risk lead for Zoloft.

Dated: August 15, 2013

Respectfully Submitted,

/s/ Mark P. Robinson, Jr.  
Mark P. Robinson, Jr.  
ROBINSON CALCAGNIE ROBINSON  
SHAPIRO DAVIS, INC.  
19 Corporate Plaza Drive  
Newport Beach, CA 92660  
Tel.: 949-720-1288  
Fax: 949-720-1292  
[Beachlawyer51@hotmail.com](mailto:Beachlawyer51@hotmail.com)

/s/ Dianne M. Nast, Esq.  
Dianne M. Nast, Esq.  
NastLaw LLC  
1101 Market Street  
Aramark Tower  
Suite 2801  
Philadelphia, PA 19107  
Tele: 215-923-9300  
Fax: 215-923-9303  
dnast@rodanast.com

***PLAINTIFFS CO-LEAD COUNSEL***

**CERTIFICATE OF SERVICE**

I hereby certify that, on August 15, 2013, I served the foregoing **PLAINTIFFS' NOTICE OF TAKING VIDEOTAPED DEPOSITION OF PIERRE RAILLARD AND REQUEST FOR PRODUCTION OF DOCUMENTS** on the following counsel by electronic mail:

Mark Cheffo  
Katherine Armstrong  
Quinn Emanuel Urquhart & Sullivan, LLP  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
212-849-7099 Direct

/s/ Mark P. Robinson, Jr.  
Mark P. Robinson, Jr.  
ROBINSON CALCAGNIE ROBINSON  
SHAPIRO DAVIS, INC.  
19 Corporate Plaza Drive  
Newport Beach, CA 92660  
Tel.: 949-720-1288  
Fax: 949-720-1292  
[Beachlawyer51@hotmail.com](mailto:Beachlawyer51@hotmail.com)

/s/ Dianne M. Nast, Esq.  
Dianne M. Nast, Esq.  
NastLaw LLC  
1101 Market Street  
Aramark Tower  
Suite 2801  
Philadelphia, PA 19107  
Tele: 215-923-9300  
Fax: 215-923-9303  
dnast@rodanast.com