

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

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

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**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 MOJGAN
MOGHADDASSI, PHARM.D., FORMER PFIZER INC. SENIOR MANAGER, U.S.
REGULATORY AFFAIRS, 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 Mojgan Moghaddassi, Pharm.D., former Pfizer Inc. Senior Manager, U.S. Regulatory Affairs, in the above action, to begin on October 8 and 9, 2013 at 9:30 am Eastern Standard Time, at Quinn Emanuel Urquhart & Sullivan, 51 Madison Avenue, 22nd Floor, New York, NY 10010. The deposition shall be taken stenographically, conducted under the supervision of an officer who is authorized to administer an oath, and be video recorded. Plaintiffs reserve the right to use at the trial of this action the deposition and videotape recording of the deposition of the deponents in accordance with Fed. R. Civ. P. 32.

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 in Exhibit “A” attached hereto within thirty (30) days prior to the deposition or at the deposition, whichever is sooner.

Dated: September 18, 2013

Respectfully Submitted,

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

EXHIBIT "A"

1. All documents reviewed by the deponent in preparing for this deposition.
2. The custodial file for the witness.
3. Any and all documents not previously produced relating to the deponent.
4. Any and all documents not previously produced that relate to whether prenatal exposure to Zoloft causes or increases the risk of birth defects and whether the labeling for Zoloft adequately warns of such risks.

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.

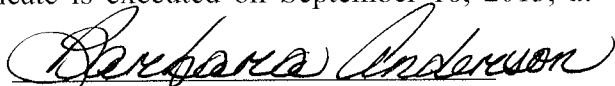
On September 18, 2013, I served the foregoing document described as:
Plaintiffs' Notice Of Taking Videotaped Deposition Of Mojgan Moghaddassi, Pharm.D., Former Pfizer Inc. Senior Manager, U.S. Regulatory Affairs, And Request For Production Of Documents on the following person(s) in the manner indicated:

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 September 18, 2013, at Newport Beach, California.


Barbara Anderson

SERVICE LIST

<p>Mark S. Cheffo, Esq. Quinn Emanuel Urquhart & Sullivan 51 Madison Avenue, 22nd Floor New York, NY 10010 Telephone: (212) 849-7000 Markcheffo@quinnemanuel.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 dnast@nastlaw.com</p> <p>Plaintiffs' Co-Lead Counsel</p>
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