

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 19, 2013

Respectfully Submitted,

/s/ 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 19, 2013, I served the foregoing document described as:
Plaintiffs' Notice Of Taking Videotaped Deposition Of Pfizer-Affiliated Witness Jigna Shah, Pharm.D.
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 19, 2013, at Newport Beach, California.


Barbara Anderson

SERVICE LIST

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