



and 5 Marketing 30(b)(6) deposition has resulted in a large request by the PSC for Marketing custodial files and Pfizer Marketing employee depositions to be accomplished in the first 3 or 4 months of 2014.

While Plaintiffs acknowledge that the October 22, 2013 Special Master order for additional discovery for additional medical records, employment records, and substance abuse records, together with an additional request for Plaintiffs' parents' emails and ESI has dramatically increased the amount of time and effort to gather Plaintiffs' discovery by Plaintiffs' counsel, Pfizer's failure to accept the October and November 2013 dates for Plaintiffs' depositions (even though Plaintiffs agreed to allow for a subsequent Plaintiffs' deposition based on later provided discovery) increased the burden to meet the scheduling deadlines agreed to by the parties and approved by the Court. The combination of the Pfizer Sales and Marketing discovery delay, the additional Plaintiffs' case specific discovery under the October 22, 2013 Special Master Order and ESI discovery, as well as Pfizer's rejection of the early proffered dates for Plaintiffs' depositions in October and November 2013 has together made 25 Discovery Pool cases unworkable. Currently, completing fact discovery on the 25 Discovery Pool cases within the dates set by the schedule and moving forward with the trial pool case selection process in a manner that is fair for both parties is unrealistic at this stage. Within the last two weeks, Plaintiffs' counsel have requested of Defense counsel that the parties agree to modify the Discovery Pool picks to 8 Plaintiff Discovery Pool picks and 8 Defense Discovery Pool picks. Pfizer's counsel rejected Plaintiffs' request. As such, Plaintiffs are simply asking this Court to re-work the trial pool case selection process to create a more manageable schedule for each of the parties, as discussed more fully below.

**The Current Discovery Pool Process is Unworkable**

Per PTO 24, the parties had chosen twenty-five (25) discovery pool cases. From that pool, there were to be six (6) cases chosen for the trial pool cases. Per PTO 23 and 39, the depositions of Plaintiffs and certain of Plaintiffs' treating physicians are to be taken in each of the twenty-five (25) discovery pool cases by January 24, 2014. In all, with up to seven (7) depositions per case to be taken, the parties are currently responsible for covering 125 - 175 depositions over the next few months, in addition to collection of the supplementary ESI discovery and additional pregnancy and mental health discovery of mother plaintiffs, and substance abuse and employment discovery for both mother and father plaintiffs, all of which will require thousands of pages of discovery to collect and produce for each plaintiff. During this time, the parties are also expected to complete Daubert presentations and expert depositions.

Because neither the lawyers nor their clients will generally be able to participate in depositions over the holidays, this means that between January 3 and January 24, approximately eleven depositions will have to be taken on each business day. This is simply unrealistic and frankly unworkable. As noted below, Plaintiffs have offered dates for depositions going back almost three months. Pfizer took the first Plaintiff depositions on December 17, months after the first dates for such depositions were proposed to Pfizer.

Because the current discovery schedule is extremely demanding, and in an effort to expedite the deposition process, in early October Plaintiffs offered Pfizer deposition dates for a number of the plaintiffs in the discovery pool cases, to be set in October and November. Pfizer ignored Plaintiffs' offer and failed to even respond. Plaintiffs continued to send Pfizer's counsel almost weekly emails through November 14, 2013, offering deposition dates for the discovery

pool plaintiffs and certain of the treating physicians, and pushing dates into December because of Pfizer's failure to respond to Plaintiffs' communications. (*See*, Robinson Decl., Exh. 3.)

Finally, on November 26, 2013, without consulting Plaintiffs' counsel, Pfizer unilaterally selected six (6) plaintiffs to depose in December, choosing dates which had not been offered by Plaintiffs' counsel and which had not been previously discussed between the parties to determine availability of either plaintiffs or their counsel. Plaintiffs have consistently agreed to dates offered by Pfizer in setting Pfizer's corporate witness depositions, yet did not receive the same courtesy from Pfizer. At this point, only two of the depositions required by the current schedule have been taken.

**Plaintiffs Suggest Modification of the Discovery Pool and Trial Selection Process to Maintain the Current Trial Date and Ensure a Fair and Realistic Result for Both Parties**

The first MDL trial is set to commence on November 3, 2014. In attempting to ensure that the MDL trial would be the first Zolofit trial in the country, Plaintiffs' PSC successfully persuaded counsel for plaintiffs in state court in Pennsylvania and St. Louis to move their trial dates to early 2015 in deference to this Court. However, with such a burdensome discovery schedule relating to the twenty-five (25) discovery pool cases, in addition to the parties' other responsibilities in preparing the trial pool cases for the November 3, 2014 trial date, the current case selection process is unworkable. Plaintiffs suggest that this Court reduce the discovery pool of cases to a more manageable number so that both parties can realistically prepare their cases for trial.

Under the current case selection process, Plaintiffs were allowed to choose twelve (12) discovery pool cases and Pfizer was to choose thirteen (13), ultimately to be pared down to six (6) cases as trial pool bellwether picks. The fundamental concept behind the bellwether selection process is to choose *representative* cases for core discovery and ultimately, trial. The ultimate

aim of establishing bellwether case selection procedures is not to pick “home-run” cases for either side, but rather to identify cases that will “serve their twin goals as informative indicators of future trends and catalysts for an ultimate resolution.” Fallon, Eldon E., *et al.*, *Bellwether Trials in Multidistrict Litigation*, 82 Tul. L. Rev. 2323, 2343 (June 2008).

Nevertheless, it seems that Pfizer has continuously selected non-representative cases to include as its discovery pool picks. As a result, Pfizer’s strategy has forced counsel for Plaintiffs to dismiss a number of its non-representative cases. Currently, out of Pfizer’s thirteen (13) discovery pool picks, three (3) were dismissed last week and another may be dismissed in the near future. Today, Pfizer has selected three additional cases.

Furthermore, per PTO 44, when Plaintiffs dismiss these non-representative cases, Pfizer is allowed to strike the same number of Plaintiffs’ discovery pool selections from being chosen for trial. Clearly, Pfizer’s strategy of routinely choosing non-representative cases to include in its discovery pool has provided Pfizer with the ultimate benefit of controlling the trial selection process through striking Plaintiffs’ potential trial picks. Pfizer’s exploitation of the trial selection process defeats the purpose of bellwether selection and puts Pfizer at a distinct and unfair advantage.

### **Conclusion**

To properly and fairly complete the trial selection process in this MDL, Plaintiffs request that this Court reduce the discovery pool to eight (8) Plaintiff picks and eight (8) Defense picks, or to a smaller number as this Court determines appropriate. In addition, Plaintiffs request that this Court prevent either side from striking any trial selection picks so that the ultimate pool for selection of trial pick cases is a fair balance of Plaintiffs’ and Pfizer’s representative choices. Plaintiffs ask that this Court determine which cases should ultimately be tried, as well as the

order in which those cases should be tried. Finally, Plaintiffs request that the Court hear this motion at the January 17, 2014 status conference.

Dated: December 27, 2013

Respectfully Submitted,

***PLAINTIFFS' EXECUTIVE COMMITTEE***

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4. Attached hereto as Exhibit 3 is a true and correct copy of a series of email correspondence offering Pfizer deposition dates for the discovery pool plaintiffs and certain of the treating physicians.

I declare under penalty of perjury in accordance with the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on December 27, 2013, at Newport Beach, California.

/s/ Mark P. Robinson, Jr.  
Mark P. Robinson, Jr.

# **EXHIBIT 1**

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

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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:

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HON. CYNTHIA M. RUFÉ

**PLAINTIFFS' NOTICE OF TAKING VIDEOTAPED DEPOSITION OF PFIZER,  
INC.'s AND GREENSTONE LLC's PERSON(S) MOST KNOWLEDGEABLE  
PURSUANT TO F.R.C.P. 30(b)(6)**

TO DEFENDANT PFIZER, INC. AND DEFENDANT GREENSTONE LLC 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 Defendants Pfizer, Inc. (hereinafter "Pfizer") and Greenstone LLC (hereinafter "Greenstone"), pursuant to Fed. R. Civ. P. 30(b)(6) in the above action, to begin on December 19, 20 and 21, 2012, at 10:00 a.m. Eastern Standard Time, at Skadden, Arps, Slate, Meagher & Flom LLP, Four Times Square, New York, NY 10036. 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), Defendants Pfizer and Greenstone 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 below 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 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. “Pfizer,” “Pfizer, Inc.,” “You,” “Your,” or Defendant refers to Defendants Pfizer, Inc., and its subsidiaries, Pfizer LLC, Pfizer Pharmaceutical LLC and Pfizer International LLC (including Roerig) and 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 Pfizer. “Roerig” refers to defendant Roerig & Co. 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" mean Pfizer (including Roerig) and Greenstone and any of their 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 and/or Greenstone 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 names and identities of the past and present organizational structures of Pfizer/Greenstone, including departments, divisions, subdivisions, teams, and individuals (excluding clerical personnel), relating to the Zolof/sertraline hydrochloride 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 pharmaco-vigilance (PSURs/post-marketing, AERs, publications) from the time first developed until the present.

**DOCUMENT REQUESTS TO DEFENDANTS PFIZER AND GREENSTONE**

Please produce:

1. All documents reviewed by the deponent in preparing for this deposition.
2. All documents concerning corporate, departmental, and employee organizational charts.
3. All documents concerning your protocol or standard operating procedures (SOP) regarding the following departments, divisions, subdivisions, teams and individuals:
  - a. Pfizer/Greenstone Interaction;
  - b. Electronically stored information/databases (ESI native with meta-data preservation);
  - c. Marketing/market research;
  - d. Sales/medical information;
  - e. Regulatory;
  - f. Safety (animal studies, clinical studies);
  - g. Labeling;
  - h. Corporate organization/corporate compliance;
  - i. Pharmaco-vigilance (PSURs/post-marketing, AERs, publications).

Dated: November 15, 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 November 15, 2012, I served the foregoing document described as:

Plaintiffs' Notice Of Taking Videotaped Deposition Of Pfizer, Inc.'s and Greenstone LLC's Person(s)

Most Knowledgeable Pursuant To F.R.C.P. 30(b)(6)

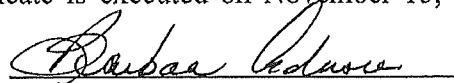
on the following person(s) in the manner indicated:

**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 November 15, 2012, at Newport Beach, California.

  
Barbara Anderson

**SERVICE LIST**

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# **EXHIBIT 2**

# ZOLOFT MDL 2342

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December 27, 2013

VIA EMAIL

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RE: Document Discovery Issues

Dear Special Master Chirls:

By this letter the Plaintiffs' Steering Committee requests an Order requiring Pfizer to produce 30(b)(6) witnesses for deposition on the topics of Sales and Marketing Research by January 15, 2014 and January 31, 2014 respectively.

The PSC served its first 30(b)(6) deposition notice on July 20, 2012. This notice included matters covering marketing, sales, and market research. After objections by Defendants, Plaintiffs served a revised notice on November 15, 2012 pursuant to Pretrial Order No. 15. In that same Order, Pfizer was ordered to provide Rule 30(b)(6) witnesses by March 1, 2013, and was later given an extension to April 1, 2013 to make the witnesses available.

Since that time, the PSC has engaged in an extensive dialogue with Pfizer regarding the scheduling of the Marketing, Sales and Marketing Research depositions. Following these discussions, the PSC was given the opportunity to take the deposition of Patrick Holmes on July 23, 2013, approximately 8 months after the Court's order. Mr. Holmes was offered as a limited Marketing 30(b)(6) witness related to the 2000 to 2006 time period and had never worked on Zolofit.

Following this deposition, on August 9, 2013, Pfizer said they would be providing November 2013 dates for the remainder of the Marketing 30(b)(6) deposition, as well as the Sales and Marketing Research depositions, and that these witnesses would be offered for substantive testimony as well as 30(b)(6). The PSC's position, both currently and at that time, was that Pfizer should produce the requested witnesses as true 30(b)(6) witnesses as soon as possible so that the necessary background information could be provided for further discovery. While, the PSC disputed that it should take three additional months for true 30(b)(6)

Andrew Chirls, Special Master  
December 27, 2013  
Page 2

witnesses to be produced (approximately one year from the Court's November 2012 Order), it acquiesced at the time after discussion to obtain definite dates for these depositions.

Pfizer ultimately offered November 5<sup>th</sup> and 6<sup>th</sup>, 2013 for the continuation of the 30(b)(6) Marketing deposition of Kristen Albright. Pfizer, however, did not provide dates for the Sales and Marketing Research depositions despite *at least ten* requests by Plaintiffs between August and November. Approximately ten days before Ms. Albright's deposition, Pfizer informed the PSC that there was a large supplementation to Ms. Albright's custodial file that would not be available prior to the deposition. As a result the deposition was pushed to December 4<sup>th</sup> and 5<sup>th</sup>, 2013. That supplementation ultimately entailed approximately 500 pages and was provided on November 21, 2013. Ms. Albright's deposition went forward in December, approximately 13 months after the Court's Order and approximately 8 months after the Court's deadline.

On December 4, 2013, having never received any proposed dates, the PSC again requested dates for the Sales and Marketing Research 30(b)(6) witnesses. In that communication, the PSC again said these witnesses should be as true, non-substantive 30(b)(6) witnesses, and they would be needed within 30 days in order to make sure Plaintiffs could pursue necessary discovery before trial. Pfizer replied back stating it could make a substantive Sales witness available on February 24<sup>th</sup> and 25<sup>th</sup>, 2014. No dates have ever been offered for the Marketing Research deposition.

In response to Pfizer's proposed dates, the PSC attempted to compromise, offering to extend its deadlines for the Sales and Marketing Research depositions to January 15, 2014 and January 31, 2014, respectively. Pfizer's reply (attached as Exhibit A) said the requested dates were "not reasonable" and Pfizer was "still working on identifying someone who can appropriately testify about the topics, and that person [would] need to go through the 30(b)(6) education process." Pfizer also commented in its response letter to the PSC that because no depositions of prescribing physicians has been taken, "there is no evidence in this case that even a single physician who prescribed Zoloft for one of the discovery group cases was even influenced by Pfizer's marketing."

Today we are over a year from the date of the Court's Order directing 30(b)(6) witnesses be produced by April 2013. These types of depositions are typically done at the beginning of a litigation so Plaintiffs can determine their course of discovery in a more educated and efficient way. The PSC has been more than accommodating in attempting to schedule the Sales and Marketing Research depositions, but it is now apparent that the Master's intervention is necessary to achieve that goal.

Trials begin in less than a year. The PSC needs the basic sales and marketing discovery described above. These depositions have been repeatedly requested and ordered by the Court to allow the PSC to determine the remainder of the witnesses that are necessary to complete depositions for trial. Accordingly, the PSC respectfully requests the Master enter an Order requiring Pfizer to produce a non-

Andrew Chirls, Special Master  
December 27, 2013  
Page 3

substantive 30(b)(6) witness on Sales by January 15, 2014 and a non-substantive 30(b)(6) witness on Marketing Research by January 31, 2014.

Sincerely,

/s/ Joseph J. Zonies

/s/ Mark P. Robinson, Jr.

/s/ Dianne M. Nast

/s/ Christopher Schnieders

cc: (via e-mail)  
Mark Cheffo, Esq.  
Katherine Armstrong, Esq.  
Mara Cusker-Gonzalez, Esq.  
Sean P. Tracey, Esq.  
Stephen A. Corr, Esq.

# EXHIBIT A

**From:** [Katherine Armstrong](#)  
**To:** [Beach Lawyer](#); [Mark Cheffo](#); [Paul LaFata](#)  
**Cc:** [dnast@nastlaw.com](#); [stracey@traceylawfirm.com](#); [jzonies@rplaw.com](#); [Karen Menzies](#); [eblizzard@blizzardlaw.com](#); [Scott Nabers](#); [Christopher L. Schnieders](#); [Bryan Aylstock](#); [ebraniff@weitzlux.com](#); [banderson@rcrlaw.net](#); [Jennifer Liakos](#)  
**Subject:** RE: Zoloft - 30(b)(6) Depositions  
**Date:** Monday, December 16, 2013 9:41:44 AM

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Mark,

As I have explained in the past, identifying sales and market research witnesses for a product that has not been actively marketed since 2006 is difficult and we are doing our best, but the dates that you propose are not reasonable. We are still working on identifying someone who can appropriately testify about the topics, and that person will need to go through the 30(b)(6) education process.

At the same time, you have taken a 30(b)(6) witness on marketing for two days, while we have not been able to take a single physician deposition due to the deficiencies in plaintiffs' discovery responses. As a result, there is no evidence in this case that even a single physician who prescribed Zoloft for one of the discovery group cases was even influenced by Pfizer's marketing.

---

**From:** Beach Lawyer [mailto:beachlawyer51@hotmail.com]  
**Sent:** Tuesday, December 10, 2013 7:32 PM  
**To:** Katherine Armstrong; Mark Cheffo; Paul LaFata  
**Cc:** dnast@nastlaw.com; stracey@traceylawfirm.com; jzonies@rplaw.com; Karen Menzies; eblizzard@blizzardlaw.com; Scott Nabers; cschnieders@wcllp.com; Bryan Aylstock; ebraniff@weitzlux.com; banderson@rcrlaw.net; Jennifer Liakos  
**Subject:** RE: Zoloft - 30(b)(6) Depositions

Katherine,

In November 2012, Judge Rufe ordered Pfizer to give us sales and marketing discovery. We have repeatedly requested dates during the last year for the sales and market research 30(b)(6) depositions. We need these depositions to send out additional requests for production and a notice of the sales and market research depositions for the Pfizer employees who are identified at these 30(b)(6) depositions. If we do not complete these 30(b)(6) depositions within the next 30-40 days, Plaintiffs will be forever prejudiced in our trial preparation. Time is of the essence for these depositions.

In my original email I requested both of these depositions be completed on or before January 4th. In the spirit of cooperation, I will extend this deadline. Plaintiffs must be allowed to complete the sales 30(b)(6) deposition on or before January 15, 2014 and the market research 30(b)(6) on or before January 31, 2014.

Otherwise you obviously will be forcing us to go back to Judge Rufe to seek some form of relief/sanctions.

Respectfully submitted,



Mark P. Robinson, Jr.

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From: [KatherineArmstrong@quinnemanuel.com](mailto:KatherineArmstrong@quinnemanuel.com)  
To: [beachlawyer51@hotmail.com](mailto:beachlawyer51@hotmail.com); [MarkCheffo@quinnemanuel.com](mailto:MarkCheffo@quinnemanuel.com);  
[PaulLaFata@quinnemanuel.com](mailto:PaulLaFata@quinnemanuel.com)  
CC: [dnast@nastlaw.com](mailto:dnast@nastlaw.com); [tracey@traceylawfirm.com](mailto:tracey@traceylawfirm.com); [jzonies@rplaw.com](mailto:jzonies@rplaw.com);  
[kbsmenzies@rcrlaw.net](mailto:kbsmenzies@rcrlaw.net); [ebizzard@blizzardlaw.com](mailto:ebizzard@blizzardlaw.com); [snabers@blizzardlaw.com](mailto:snabers@blizzardlaw.com);  
[cschnieders@wcllp.com](mailto:cschnieders@wcllp.com); [baylstock@awkolaw.com](mailto:baylstock@awkolaw.com); [ebrianiff@weitzlux.com](mailto:ebrianiff@weitzlux.com);  
[banderson@rcrlaw.net](mailto:banderson@rcrlaw.net)  
Date: Wed, 4 Dec 2013 13:27:30 -0800  
Subject: RE: Zoloft - 30(b)(6) Depositions

I think we need a point of clarification to begin with, because your use of the words “substantive” and “30(b)(6) only” are confusing different concepts. PTO 23 contemplates three types of fact depositions:

Non-substantive 30(b)(6) depositions: Hughes, Gramling and Holmes were non-substantive 30(b)(6) witnesses. We agreed that they would be high level depositions on organization and process, so as to require less preparation and would not count towards your witness limit.

Substantive 30(b)(6) depositions  
Fact witnesses.

PTO 23 gives us the right to designate any substantive 30(b)(6) witness as a fact witness to prevent that person from being deposed twice. It’s not your option to say that they are “30(b)(6) only.”

Pfizer’s 30(b)(6) witness on sales is available for deposition on February 25 and 26 in Los Angeles. We will supply the name later, but it is likely we will also designate him as a fact witness. He will testify about the Roerig sales organization, which had the primary responsibility for sales. We are also working on someone from the Pratt sales organization and someone from market research.

We have also obtained dates for the following additional witnesses requested by you:

John Price: February 5 & 6. Please confirm whether you need two days.

Jeanette Barrett: Early March. If you let us know whether you need one or two days and I can provide specific dates.

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**From:** Beach Lawyer [[mailto:beachlawyer51@hotmail.com](mailto:mailto:beachlawyer51@hotmail.com)]  
**Sent:** Wednesday, December 04, 2013 4:01 PM  
**To:** Mark Cheffo; Katherine Armstrong; Paul LaFata  
**Cc:** [dnast@nastlaw.com](mailto:dnast@nastlaw.com); [tracey@traceylawfirm.com](mailto:tracey@traceylawfirm.com); [jzonies@rplaw.com](mailto:jzonies@rplaw.com); Karen Menzies;  
[ebizzard@blizzardlaw.com](mailto:ebizzard@blizzardlaw.com); Scott Nabers; [cschnieders@wcllp.com](mailto:cschnieders@wcllp.com); Bryan Aylstock;  
[ebrianiff@weitzlux.com](mailto:ebrianiff@weitzlux.com); [banderson@rcrlaw.net](mailto:banderson@rcrlaw.net)  
**Subject:** RE: Zoloft - 30(b)(6) Depositions

Quick correction, just noticed, marketing 30(b)(6) should read market research 30(b)(6).

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From: [beachlawyer51@hotmail.com](mailto:beachlawyer51@hotmail.com)

To: [markcheffo@quinnemanuel.com](mailto:markcheffo@quinnemanuel.com); [katherinearmstrong@quinnemanuel.com](mailto:katherinearmstrong@quinnemanuel.com);  
[paullafata@quinnemanuel.com](mailto:paullafata@quinnemanuel.com)

CC: [dnast@nastlaw.com](mailto:dnast@nastlaw.com); [tracey@traceylawfirm.com](mailto:tracey@traceylawfirm.com); [jzonies@rplaw.com](mailto:jzonies@rplaw.com);  
[kbmenzies@rcrlaw.net](mailto:kbmenzies@rcrlaw.net); [ebizzard@blizzardlaw.com](mailto:ebizzard@blizzardlaw.com); [snabers@blizzardlaw.com](mailto:snabers@blizzardlaw.com);  
[cschnieders@wcllp.com](mailto:cschnieders@wcllp.com); [baylstock@awkolaw.com](mailto:baylstock@awkolaw.com); [ebraniff@weitzlux.com](mailto:ebraniff@weitzlux.com);  
[banderson@rcrlaw.net](mailto:banderson@rcrlaw.net)

Subject: Zoloft - 30(b)(6) Depositions

Date: Wed, 4 Dec 2013 12:32:55 -0800

Mark, Katherine and Paul,

It has been over 16 months since we sent out our 30(b)(6) notices. We desperately need a sales 30(b)(6) followed by a marketing 30(b)(6) set of depositions. We do not want them to be substantive depositions but rather 30(b)(6) only. We would like them to take place in the next 30 days. We suggest the first week in January in New York.

Mark Robinson and Dianne Nast

# **EXHIBIT 3**

**Barbara Anderson**

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**From:** Barbara Anderson  
**Sent:** Monday, October 07, 2013 2:59 PM  
**To:** 'Mark Cheffo'; Katherine Armstrong; 'Mara Cusker Gonzalez'  
**Cc:** beachlawyer51@hotmail.com; 'DNast@NastLaw.com'  
**Subject:** Zolof - Deposition Availability List  
**Attachments:** Deposition Availability 10.7.13.pdf

Attached is a list of available dates that Plaintiffs' counsel have provided for Plaintiffs' depositions. I will update the list as I receive more dates from Plaintiffs' firms.

Thank you.  
Barbara

**Barbara Anderson**  
Paralegal



19 Corporate Plaza Drive  
Newport Beach, California 92660  
tel: 949.720.1288  
fax: 949.720.1292

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ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

Case No.	Case Name	Deponent	City	State	Firm	Date Availability	Notes
13-cv-02197	Malek v. Pfizer	Malek, Lori	Stevens Point	Wisconsin	Meyerson & O'Neill	11/14/2013 11/19/2013 11/21/2013 11/26/2013	
13-cv-02272	Cooper v. Pfizer	Cooper, Lora	Laconia	New Hampshire	Sanders Law Firm	11/12/2013-11/15/2013 11/19/2013-11/22/2013	If you chose a date at the later end of those weeks we are free to do the prescribing physicians earlier in the week, or conversely can do the client early in the week and the doctors later in the week.
13-cv-02272	Cooper v. Pfizer	Prescribing Physicians	Laconia	New Hampshire	Sanders Law Firm	11/12/2013-11/15/2013 11/19/2013-11/22/2013	If you chose a date at the later end of those weeks we are free to do the prescribing physicians earlier in the week, or conversely can do the client early in the week and the doctors later in the week.
13-cv-02291	Breaux v. Pfizer	Breaux, Kathleen	Lake Charles	Louisiana	Sanders Law Firm	10/28/2013-11/01/2013 11/11/2013-11/22/2013	
12-cv-02595	Long v. Pfizer	Long, Diedra	Tuscaloosa	Alabama	Beasley Allen	11/18/2013 11/19/2013	

**Barbara Anderson**

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**From:** Barbara Anderson  
**Sent:** Tuesday, October 15, 2013 9:29 AM  
**To:** 'Mark Cheffo'; Katherine Armstrong; 'Mara Cusker Gonzalez'  
**Cc:** beachlawyer51@hotmail.com; 'dnast@nastlaw.com'  
**Subject:** Zoloft - Deposition Availability  
**Attachments:** Deposition Availability Schedule 10.15.13.pdf

Attached is a list of available dates that Plaintiffs' counsel have provided for Plaintiffs' depositions in Zoloft MDL 2342. I will update the list as I receive more dates from Plaintiffs' firms.

Thank you.  
Barbara

**Barbara Anderson**  
Paralegal



19 Corporate Plaza Drive  
Newport Beach, California 92660  
tel: 949.720.1288  
fax: 949.720.1292

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ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

Case No.	Case Name	Deponent	City	State	Firm	Date Availability	Notes
13-cv-02291	Breaux v. Pfizer Inc.	Breaux, Kathleen	Lake Charles	Louisiana	Sanders Law Firm	10/28/2013- 11/01/2013 11/11/2013- 11/22/2013	
13-cv-02272	Cooper v. Pfizer, Inc.	Cooper, Lora	Laconia	New Hampshire	Sanders Law Firm	11/12/2013- 11/15/2013 11/19/2013- 11/22/2013	If you chose a date at the later end of those weeks we are free to do the prescribing physicians earlier in the week, or conversely can do the client early in the week and the doctors later in the week.
13-cv-02272	Cooper v. Pfizer, Inc.	Prescribing Physicians	Laconia	New Hampshire	Sanders Law Firm	11/12/2013- 11/15/2013 11/19/2013- 11/22/2013	If you chose a date at the later end of those weeks we are free to do the prescribing physicians earlier in the week, or conversely can do the client early in the week and the doctors later in the week.
13-cv-00365	Crabtree, et al. v. Pfizer, Inc.	Crabtree, Susan	Scottsdale/Phoenix	Arizona	Motley Rice	11/14/2013	Beginning at 10:00 am
13-cv-00365	Crabtree, et al. v. Pfizer, Inc.	Crabtree, Barry	Scottsdale/Phoenix	Arizona	Motley Rice	11/15/2013	Beginning at 9:00 am
12-cv-02595	Long, et al. v. Wolters Kluwer Health, Inc., et al.	Long, Diedra	Tuscaloosa	Alabama	Beasley Allen	11/18/2013 11/19/2013	
13-cv-02197	Malek, et al. v. Pfizer, Inc., et al.	Malek, Lori	Stevens Point	Wisconsin	Meyerson & O'Neill	11/14/2013 11/19/2013 11/21/2013 11/26/2013	
13-cv-00166	Mary Saville, et al., v. Pfizer, Inc., et al.	Saville, Mary	Tampa	Florida	Blizzard & Nabers	11/6/2013	
13-cv-00166	Mary Saville, et al., v. Pfizer, Inc., et al.	Saville, Dave	Tampa	Florida	Blizzard & Nabers	11/7/2013	
12-cv-02683	Russell McGoun, III, et al. v. Wolters Kluwer Health, Inc., et al.	Beckwith, Kayla	Pittsburgh	Pennsylvania	Blizzard & Nabers	11/18/2013- 11/20/2013	
12-cv-02683	Russell McGoun, III, et al. v. Wolters Kluwer Health, Inc., et al.	McGoun, II, Russell	Pittsburgh	Pennsylvania	Blizzard & Nabers	11/18/2013- 11/20/2013	
13-cv-02036	Suzanne Cordero, et al. v. Greenstone LLC, et al.	Cordero, Suzanne	Shady Cove	Oregon	Sanders Law Firm	11/15/2013 11/22/2013 12/6/2013	The provider depositions would have to be before the mothers as she is only free on Fridays.

ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

12-cv-00247	Trenton V. Casl, et al. v. Wolters Kluwer Health Inc., et al.	Wietor, Kim	Milwaukee	Wisconsin	Blizzard & Nabers	11/14/2013 11/15/2013 11/19/2013	
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**Barbara Anderson**

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**From:** Barbara Anderson  
**Sent:** Tuesday, October 22, 2013 10:34 AM  
**To:** 'Mark Cheffo'; Katherine Armstrong; 'Mara Cusker Gonzalez'  
**Cc:** beachlawyer51@hotmail.com; 'dnast@nastlaw.com'  
**Subject:** Zoloft - Deposition Availability List  
**Attachments:** Deposition Availability Schedule 10.22.13.pdf

Attached is an updated list of available dates that Plaintiffs' counsel have provided for Plaintiffs' depositions in Zoloft MDL 2342. Beasley Allen has provided a date for the deposition of Dr. Rump in *Long v. Wolters Kluwer, et al.* and would like to confirm that as soon as possible. I will update the list as I receive more dates from Plaintiffs' firms.

Thank you.  
Barbara

**Barbara Anderson**  
Paralegal



19 Corporate Plaza Drive  
Newport Beach, California 92660  
tel: 949.720.1288  
fax: 949.720.1292

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ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

Case No.	Case Name	Deponent	City	State	Firm	Date Availability	Notes
13-cv-02291	Breaux v. Pfizer Inc.	Breaux, Kathleen	Lake Charles	Louisiana	Sanders Law Firm	10/28/2013- 11/01/2013 11/11/2013- 11/22/2013	
12-cv-04577	Byington et al. v. Pfizer Inc.	Jade Byington	Boise	Idaho	Simmons Browder Gianaris Angelides & Barnerd	11/6/2013 11/7/2013 11/13/2013 11/14/2013 11/20/2013 11/21/2013	
12-cv-04577	Byington et al. v. Pfizer Inc.	Jason Byington	Boise	Idaho	Simmons Browder Gianaris Angelides & Barnerd	11/6/2013 11/7/2013 11/13/2013 11/14/2013 11/20/2013	
13-cv-02272	Cooper v. Pfizer, Inc.	Cooper, Lora	Laconia	New Hampshire	Sanders Law Firm	11/12/2013- 11/15/2013 11/19/2013- 11/22/2013	If you chose a date at the later end of those weeks we are free to do the prescribing physicians earlier in the week, or conversely can do the client early in the week and the doctors later in the week.
13-cv-02272	Cooper v. Pfizer, Inc.	Prescribing Physicians	Laconia	New Hampshire	Sanders Law Firm	11/12/2013- 11/15/2013 11/19/2013- 11/22/2013	If you chose a date at the later end of those weeks we are free to do the prescribing physicians earlier in the week, or conversely can do the client early in the week and the doctors later in the week.
13-cv-00365	Crabtree, et al. v. Pfizer, Inc.	Crabtree, Susan	Scottsdale/Phoenix	Arizona	Motley Rice	11/14/2013	Beginning at 10:00 am
13-cv-00365	Crabtree, et al. v. Pfizer, Inc.	Crabtree, Barry	Scottsdale/Phoenix	Arizona	Motley Rice	11/15/2013	Beginning at 9:00 am
13-cv-02211	Harris v. Pfizer, Inc. et al.	Harris, Mya	Fort Wayne	Indiana	Andrews and Thornton Skikos Crawford	11/6/2013 11/13/2013 11/20/2013	
12-cv-02595	Long, et al.v. Wolters Kluwer Health, Inc., et al.	Long, Diedra	Tuscaloosa	Alabama	Beasley Allen	11/18/2013 11/19/2013	
12-cv-02595	Long, et al.v. Wolters Kluwer Health, Inc., et al.	Dr. Rump	Birmingham	Alabama	Beasley Allen	12/9/2013	12 noon

ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

13-cv-02197	Malek, et al. v. Pfizer, Inc., et al.	Malek, Lori	Stevens Point	Wisconsin	Meyerson & O'Neill	11/14/2013 11/19/2013 11/21/2013 11/26/2013 12/3/2013 12/5/2013 12/10/2013 12/12/2013	
13-cv-00166	Mary Saville, et al., v. Pfizer, Inc., et al.	Saville, Mary	Tampa	Florida	Blizzard & Nabers	11/6/2013	
13-cv-00166	Mary Saville, et al., v. Pfizer, Inc., et al.	Saville, Dave	Tampa	Florida	Blizzard & Nabers	11/7/2013	
12-cv-02683	Russell McGoun, III, et al. v. Wolters Kluwer Health, Inc., et al.	Beckwith, Kayla	Pittsburgh	Pennsylvania	Blizzard & Nabers	11/18/2013- 11/20/2013	
12-cv-02683	Russell McGoun, III, et al. v. Wolters Kluwer Health, Inc., et al.	McGoun, II, Russell	Pittsburgh	Pennsylvania	Blizzard & Nabers	11/18/2013- 11/20/2013	
12-cv-02711	Sarah Kate Moore, et al. v. Wolters Kluwer Health, Inc., et al.	Moore, Sarah Kate	Houston	Texas	Tracey Law Firm	12/9/2013 12/10/2013 12/11/2013 12/12/2013 12/13/2013	
13-cv-02036	Suzanne Cordero, et al. v. Greenstone LLC, et al.	Cordero, Suzanne	Shady Cove	Oregon	Sanders Law Firm	11/15/2013 11/22/2013 12/6/2013	The provider depositions would have to be before the mothers as she is only free on Fridays.
12-cv-00247	Trenton V. Casl, et al. v. Wolters Kluwer Health Inc., et al.	Wietor, Kim	Milwaukee	Wisconsin	Blizzard & Nabers	11/14/2013 11/15/2013 11/19/2013	

**Barbara Anderson**

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**From:** Barbara Anderson  
**Sent:** Monday, October 28, 2013 9:50 AM  
**To:** 'Mark Cheffo'; Katherine Armstrong; 'Mara Cusker Gonzalez'  
**Cc:** 'Beach Lawyer'; 'DNast@NastLaw.com'  
**Subject:** Zoloft - Deposition Availability Schedule  
**Attachments:** Deposition Availability Schedule 10.28.13.pdf

Attached is a list of available dates that Plaintiffs' counsel have provided for Plaintiffs' depositions in Zoloft MDL 2342. I will update the list as I receive more dates from Plaintiffs' firms. Plaintiffs' firms have requested that you confirm dates as soon as possible so that their clients can make arrangements with work, etc. and dates provided by physicians can be confirmed and scheduled.

Thank you.  
Barbara

**Barbara Anderson**  
**Paralegal**



**19 Corporate Plaza Drive**  
**Newport Beach, California 92660**  
**tel: 949.720.1288**  
**fax: 949.720.1292**

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ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

Case No.	Case Name	Deponent	City	State	Firm	Date Availability	Notes
13-cv-02291	Breaux v. Pfizer Inc.	Breaux, Kathleen	Lake Charles	Louisiana	Sanders Law Firm	10/28/2013- 11/01/2013 11/11/2013- 11/22/2013	
12-cv-04577	Byington et al. v. Pfizer Inc.	Jade Byington	Boise	Idaho	Simmons Browder Gianaris Angelides & Barnerd	11/6/2013 11/7/2013 11/13/2013 11/14/2013 11/20/2013 11/21/2013	
12-cv-04577	Byington et al. v. Pfizer Inc.	Jason Byington	Boise	Idaho	Simmons Browder Gianaris Angelides & Barnerd	11/6/2013 11/7/2013 11/13/2013 11/14/2013 11/20/2013	
13-cv-02272	Cooper v. Pfizer, Inc.	Cooper, Lora	Laconia	New Hampshire	Sanders Law Firm	11/12/2013- 11/15/2013 11/19/2013- 11/22/2013	If you chose a date at the later end of those weeks we are free to do the prescribing physicians earlier in the week, or conversely can do the client early in the week and the doctors later in the week.
13-cv-02272	Cooper v. Pfizer, Inc.	Prescribing Physicians	Laconia	New Hampshire	Sanders Law Firm	11/12/2013- 11/15/2013 11/19/2013- 11/22/2013	If you chose a date at the later end of those weeks we are free to do the prescribing physicians earlier in the week, or conversely can do the client early in the week and the doctors later in the week.
13-cv-00365	Crabtree, et al. v. Pfizer, Inc.	Crabtree, Susan	Scottsdale/Phoenix	Arizona	Motley Rice	11/14/13 10:00 AM	Beginning at 10:00 am
13-cv-00365	Crabtree, et al. v. Pfizer, Inc.	Crabtree, Barry	Scottsdale/Phoenix	Arizona	Motley Rice	11/15/13 9:00 AM	Beginning at 9:00 am
13-cv-00593	Dennison v. Pfizer	Dennison, Felice	Austin	Texas	Reilly Pozner	11/25/2013 11/26/2013	
13-cv-00593	Dennison v. Pfizer	Dennison, Keith	Austin	Texas	Reilly Pozner	11/25/2013 11/26/2013	
12-cv-00218	Goulet, et al v. Pfizer, Inc., et al.	Jessica Goulet	Houston	Texas	Tracey Law Firm	11/14/2013 11/15/2013	
12-cv-00218	Goulet, et al v. Pfizer, Inc., et al.	Dana Goulet	Houston	Texas	Tracey Law Firm	11/14/2013 11/15/2013	
13-cv-02211	Harris v. Pfizer, Inc. et al.	Harris, Mya	Fort Wayne	Indiana	Andrews and Thornton Skikos Crawford	11/6/2013 11/13/2013 11/20/2013	

ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

13-cv-02211	Harris v. Pfizer, Inc. et al.	Prescriber Chris Jackey CNM	Anderson	Indiana	Andrews and Thornton Skikos Crawford	11/6/2013 6:00 PM 11/20/2013 9:00 AM 12/2/2013 2:30 PM 12/3/2013 1:00 PM	Prescriber's office address is 1931 Brown St, Anderson, IN 46016, and she has indicated this is fine for the depo.
12-cv-02595	Long, et al.v. Wolters Kluwer Health, Inc., et al.	Long, Diedra	Tuscaloosa	Alabama	Beasley Allen	11/18/2013 11/19/2013	
12-cv-02595	Long, et al.v. Wolters Kluwer Health, Inc., et al.	Dr. Rump	Birmingham	Alabama	Beasley Allen	12/9/13 12:00 AM	12 noon
13-cv-02197	Malek, et al. v. Pfizer, Inc., et al.	Malek, Lori	Stevens Point	Wisconsin	Meyerson & O'Neill	11/14/2013 11/19/2013 11/21/2013 11/26/2013 12/3/2013 12/5/2013 12/10/2013 12/12/2013	
13-cv-00166	Mary Saville, et al., v. Pfizer, Inc., et al.	Saville, Mary	Tampa	Florida	Blizzard & Nabers	11/6/13 12:00 AM	
13-cv-00166	Mary Saville, et al., v. Pfizer, Inc., et al.	Saville, Dave	Tampa	Florida	Blizzard & Nabers	11/7/13 12:00 AM	
12-cv-02683	Russell McGoun, III, et al. v. Wolters Kluwer Health, Inc., et al.	Beckwith, Kayla	Pittsburgh	Pennsylvania	Blizzard & Nabers	11/18/2013- 11/20/2013	
12-cv-02683	Russell McGoun, III, et al. v. Wolters Kluwer Health, Inc., et al.	McGoun, II, Russell	Pittsburgh	Pennsylvania	Blizzard & Nabers	11/18/2013- 11/20/2013	
12-cv-02711	Sarah Kate Moore, et al. v. Wolters Kluwer Health, Inc., et al.	Moore, Sarah Kate	Houston	Texas	Tracey Law Firm	12/9/2013 12/10/2013 12/11/2013 12/12/2013 12/13/2013	
13-cv-02036	Suzanne Cordero, et al. v. Greenstone LLC, et al.	Cordero, Suzanne	Shady Cove	Oregon	Sanders Law Firm	11/15/2013 11/22/2013 12/6/2013	The provider depositions would have to be before the mothers as she is only free on Fridays.
12-cv-00247	Trenton V. Casl, et al. v. Wolters Kluwer Health Inc., et al.	Wietor, Kim	Milwaukee	Wisconsin	Blizzard & Nabers	11/14/2013 11/15/2013 11/19/2013	

**Barbara Anderson**

---

**From:** Barbara Anderson  
**Sent:** Thursday, November 07, 2013 10:31 AM  
**To:** 'Mark Cheffo'; Mara Cusker Gonzalez; Katherine Armstrong  
**Cc:** beachlawyer51@hotmail.com; 'dnast@nastlaw.com'  
**Subject:** Zoloff - Deposition Availability Schedule  
**Attachments:** Deposition Availability Schedule 11.7.13.pdf

Attached is a list of available dates that Plaintiffs' counsel have provided for Plaintiffs' depositions. I will update the list as I receive more dates from Plaintiffs' firms.

Thank you.  
Barbara

**Barbara Anderson**  
**Paralegal**



**19 Corporate Plaza Drive**  
**Newport Beach, California 92660**  
**tel: 949.720.1288**  
**fax: 949.720.1292**

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ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

Case No.	Case Name	Deponent	City	State	Firm	Date Availability	Notes
12-cv-6934	Amie Morgan, et al. v. Pfizer, Inc. (Dillard)	Dillard, Jennifer Leigh	Spartanburg	South Carolina	Napoli Bern	12/6/2013 9:00 AM EST	
12-cv-6934	Amie Morgan, et al. v. Pfizer, Inc. (Keel)	Keel, April Victoria	Clinton	Louisiana	Napoli Bern	12/4/2013 9:00 AM CST	
13-cv-00724	Berg v. Pfizer, et al.	Berg, Sarah	Round Rock	Texas	RCRSD	12/03/2013 12/05/2013	
13-cv-00724	Berg v. Pfizer, et al.	Berg, Zate	Round Rock	Texas	RCRSD	12/03/2013 12/05/2013	
13-cv-02291	Breaux v. Pfizer Inc.	Breaux, Kathleen	Lake Charles	Louisiana	Sanders Law Firm	10/28/2013- 11/01/2013 11/11/2013- 11/22/2013	
12-cv-04577	Byington et al. v. Pfizer Inc.	Jade Byington	Boise	Idaho	Simmons Browder Gianaris Angelides & Barnerd	11/6/2013 11/7/2013 11/13/2013 11/14/2013 11/20/2013 11/21/2013	
12-cv-04577	Byington et al. v. Pfizer Inc.	Jason Byington	Boise	Idaho	Simmons Browder Gianaris Angelides & Barnerd	11/6/2013 11/7/2013 11/13/2013 11/14/2013 11/20/2013	
13-cv-02272	Cooper v. Pfizer, Inc.	Cooper, Lora	Laconia	New Hampshire	Sanders Law Firm	11/12/2013- 11/15/2013 11/19/2013- 11/22/2013	If you chose a date at the later end of those weeks we are free to do the prescribing physicians earlier in the week, or conversely can do the client early in the week and the doctors later in the week.
13-cv-02272	Cooper v. Pfizer, Inc.	Prescribing Physicians	Laconia	New Hampshire	Sanders Law Firm	11/12/2013- 11/15/2013 11/19/2013- 11/22/2013	If you chose a date at the later end of those weeks we are free to do the prescribing physicians earlier in the week, or conversely can do the client early in the week and the doctors later in the week.
13-cv-00365	Crabtree, et al. v. Pfizer, Inc.	Crabtree, Susan	Phoenix	Arizona	Motley Rice	11/14/2013 10:00 AM 12/10/2013 10:00 AM	Beginning at 10:00 am
13-cv-00365	Crabtree, et al. v. Pfizer, Inc.	Crabtree, Barry	Phoenix	Arizona	Motley Rice	11/15/2013 9:00 AM 12/11/2013 9:00 AM	Beginning at 9:00 am



ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

13-cv-00593	Dennison v. Pfizer	Dennison, Felice	Austin	Texas	Reilly Pozner	11/25/2013 11/26/2013	
13-cv-00593	Dennison v. Pfizer	Dennison, Keith	Austin	Texas	Reilly Pozner	11/25/2013 11/26/2013	
12-cv-00218	Goulet, et al v. Pfizer, Inc., et al.	Jessica Goulet	Houston	Texas	Tracey Law Firm	11/14/2013 11/15/2013	
12-cv-00218	Goulet, et al v. Pfizer, Inc., et al.	Dana Goulet	Houston	Texas	Tracey Law Firm	11/14/2013 11/15/2013	
13-cv-02211	Harris v. Pfizer, Inc. et al.	Harris, Mya	Fort Wayne	Indiana	Andrews and Thornton Skikos Crawford	11/6/2013 11/13/2013 11/20/2013	
13-cv-02211	Harris v. Pfizer, Inc. et al.	Prescriber Chris Jackey CNM	Anderson	Indiana	Andrews and Thornton Skikos Crawford	11/6/2013 6:00 PM 11/20/2013 9:00 AM 12/2/2013 2:30 PM 12/3/2013 1:00 PM	Prescriber's office address is 1931 Brown St, Anderson, IN 46016, and she has indicated this is fine for the depo.
12-cv-02595	Long, et al.v. Wolters Kluwer Health, Inc., et al.	Long, Diedra	Tuscaloosa	Alabama	Beasley Allen	11/18/2013 11/19/2013	
12-cv-02595	Long, et al.v. Wolters Kluwer Health, Inc., et al.	Dr. Rump	Birmingham	Alabama	Beasley Allen	12/9/2013 12:00 PM (noon)	
13-cv-02197	Malek, et al. v. Pfizer, Inc., et al.	Malek, Lori	Stevens Point	Wisconsin	Meyerson & O'Neill	11/14/2013 11/19/2013 11/21/2013 11/26/2013 12/3/2013 12/5/2013 12/10/2013 12/12/2013	
13-cv-00166	Mary Saville, et al., v. Pfizer, Inc., et al.	Saville, Mary	Tampa	Florida	Blizzard & Nabers	11/6/13	
13-cv-00166	Mary Saville, et al., v. Pfizer, Inc., et al.	Saville, Dave	Tampa	Florida	Blizzard & Nabers	11/7/13	
12-cv-02683	Russell McGoun, III, et al. v. Wolters Kluwer Health, Inc., et al.	Beckwith, Kayla	Pittsburgh	Pennsylvania	Blizzard & Nabers	11/18/2013- 11/20/2013	Nov. 18th is the preferred date
12-cv-02683	Russell McGoun, III, et al. v. Wolters Kluwer Health, Inc., et al.	McGoun, II, Russell	Pittsburgh	Pennsylvania	Blizzard & Nabers	11/18/2013- 11/20/2013	Nov. 18th is the preferred date

ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

12-cv-02711	Sarah Kate Moore, et al. v. Wolters Kluwer Health, Inc., et al.	Moore, Sarah Kate	Houston	Texas	Tracey Law Firm	12/9/2013 12/10/2013 12/11/2013 12/12/2013 12/13/2013	
13-cv-02036	Suzanne Cordero, et al. v. Greenstone LLC, et al.	Cordero, Suzanne	Shady Cove	Oregon	Sanders Law Firm	11/15/2013 11/22/2013 12/6/2013	The provider depositions would have to be before the mother's as she is only free on Fridays.
12-cv-05123	Taylor v Pfizer (Conn)	Hawk, Julie	North Bend	Oregon	RCRSD	12/16/2013	
12-cv-02749	Thompson, et al. v. Wolters Kluwer Health, Inc., et al.	Thompson, Shawna Christine	Tigard	Oregon	RCRSD	12/9/2013 12/10/2013	
12-cv-00247	Trenton V. Casl, et al. v. Wolters Kluwer Health Inc., et al.	Wietor, Kim	Milwaukee	Wisconsin	Blizzard & Nabers	11/14/2013 11/15/2013 11/19/2013	

**Barbara Anderson**

---

**From:** Barbara Anderson  
**Sent:** Tuesday, November 12, 2013 7:16 PM  
**To:** 'Mark Cheffo'; Mara Cusker Gonzalez; Katherine Armstrong  
**Cc:** beachlawyer51@hotmail.com; 'dnast@nastlaw.com'  
**Subject:** Zoloft - Plaintiffs' Deposition Availability  
**Attachments:** Deposition Availability Schedule 11.12.13.pdf

Attached is a list of available dates that Plaintiffs' counsel have provided for Plaintiffs' depositions in Zoloft MDL 2342. I will update the list as I receive more dates from Plaintiffs' firms.

Thank you.  
Barbara

**Barbara Anderson**  
Paralegal



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Newport Beach, California 92660  
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ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

Case No.	Case Name	Deponent	City	State	Firm	Date Availability	Notes
12-cv-6934	Amie Morgan, et al. v. Pfizer, Inc. (Dillard)	Dillard, Jennifer Leigh	Spartanburg	South Carolina	Napoli Bern	12/6/2013 9:00 AM EST	
12-cv-6934	Amie Morgan, et al. v. Pfizer, Inc. (Keel)	Keel, April Victoria	Clinton	Louisiana	Napoli Bern	12/4/2013 9:00 AM CST	
13-cv-00724	Berg v. Pfizer, et al.	Berg, Sarah	Round Rock	Texas	RCRSD	12/03/2013 12/05/2013	
13-cv-00724	Berg v. Pfizer, et al.	Berg, Zate	Round Rock	Texas	RCRSD	12/03/2013 12/05/2013	
13-cv-02291	Breaux v. Pfizer Inc.	Breaux, Kathleen	Lake Charles	Louisiana	Sanders Law Firm	10/28/2013- 11/01/2013 11/11/2013- 11/22/2013	
12-cv-04577	Byington et al. v. Pfizer Inc.	Jade Byington	Boise	Idaho	Simmons Browder Gianaris Angelides & Barnerd	11/6/2013 11/7/2013 11/13/2013 11/14/2013 11/20/2013 11/21/2013	
12-cv-04577	Byington et al. v. Pfizer Inc.	Jason Byington	Boise	Idaho	Simmons Browder Gianaris Angelides & Barnerd	11/6/2013 11/7/2013 11/13/2013 11/14/2013 11/20/2013	
13-cv-02272	Cooper v. Pfizer, Inc.	Cooper, Lora	Laconia	New Hampshire	Sanders Law Firm	11/12/2013- 11/15/2013 11/19/2013- 11/22/2013	If you chose a date at the later end of those weeks we are free to do the prescribing physicians earlier in the week, or conversely can do the client early in the week and the doctors later in the week.
13-cv-02272	Cooper v. Pfizer, Inc.	Prescribing Physicians	Laconia	New Hampshire	Sanders Law Firm	11/12/2013- 11/15/2013 11/19/2013- 11/22/2013	If you chose a date at the later end of those weeks we are free to do the prescribing physicians earlier in the week, or conversely can do the client early in the week and the doctors later in the week.
13-cv-00365	Crabtree, et al. v. Pfizer, Inc.	Crabtree, Susan	Phoenix	Arizona	Motley Rice	11/14/2013 10:00 AM 12/10/2013 10:00 AM	Beginning at 10:00 am
13-cv-00365	Crabtree, et al. v. Pfizer, Inc.	Crabtree, Barry	Phoenix	Arizona	Motley Rice	11/15/2013 9:00 AM 12/11/2013 9:00 AM	Beginning at 9:00 am

ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

13-cv-00593	Dennison v. Pfizer	Dennison, Felice	Austin	Texas	Reilly Pozner	11/25/2013 11/26/2013 12/12/2013 12/13/2013	
13-cv-00593	Dennison v. Pfizer	Dennison, Keith	Austin	Texas	Reilly Pozner	11/25/2013 11/26/2013 12/12/2013 12/13/2013	
12-cv-00218	Goulet, et al v. Pfizer, Inc., et al.	Jessica Goulet	Nashua	New Hampshire	Tracey Law Firm	11/14/2013 11/15/2013 12/12/2013 12/13/2013	
12-cv-00218	Goulet, et al v. Pfizer, Inc., et al.	Dana Goulet	Nashua	New Hampshire	Tracey Law Firm	11/14/2013 11/15/2013 12/12/2013 12/13/2013	
13-cv-02211	Harris v. Pfizer, Inc. et al.	Harris, Mya	Fort Wayne	Indiana	Andrews and Thornton Skikos Crawford	11/6/2013 11/13/2013 11/20/2013 12/2/2013 12/6/2013 12/9/2013 12/13/2013	
	Harris v. Pfizer, Inc. et al.	Harris, Andrew	Fort Wayne	Indiana	Andrews and Thornton Skikos Crawford	12/2/2013 12/6/2013 12/9/2013 12/13/2013	
13-cv-02211	Harris v. Pfizer, Inc. et al.	Prescriber Chris Jackey CNM	Anderson	Indiana	Andrews and Thornton Skikos Crawford	12/5/2013 12/12/2013 12/16/2013	Prescriber's office address is 1931 Brown St, Anderson, IN 46016, and she has indicated this is fine for the depo.
12-cv-02595	Long, et al.v. Wolters Kluwer Health, Inc., et al.	Long, Diedra	Tuscaloosa	Alabama	Beasley Allen	11/18/2013 11/19/2013 12/12/2013 12/13/2013 12/16/2013 12/17/2013	
12-cv-02595	Long, et al.v. Wolters Kluwer Health, Inc., et al.	Dr. Rump	Birmingham	Alabama	Beasley Allen	12/9/2013 12:00 PM (noon)	

ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

13-cv-02197	Malek, et al. v. Pfizer, Inc., et al.	Malek, Lori	Stevens Point	Wisconsin	Meyerson & O'Neill	11/14/2013 11/19/2013 11/21/2013 11/26/2013 12/3/2013 12/5/2013 12/10/2013 12/12/2013	
13-cv-00166	Mary Saville, et al., v. Pfizer, Inc., et al.	Saville, Mary	Tampa	Florida	Blizzard & Nabers	11/6/2013 12/3/2013	
13-cv-00166	Mary Saville, et al., v. Pfizer, Inc., et al.	Saville, Dave	Tampa	Florida	Blizzard & Nabers	11/7/2013 12/4/2013	
12-cv-02683	Russell McGoun, III, et al. v. Wolters Kluwer Health, Inc., et al.	Beckwith, Kayla	Pittsburgh	Pennsylvania	Blizzard & Nabers	11/18/2013- 11/20/2013 12/9/2013	Nov. 18th is the preferred date
12-cv-02683	Russell McGoun, III, et al. v. Wolters Kluwer Health, Inc., et al.	McGoun, II, Russell	Pittsburgh	Pennsylvania	Blizzard & Nabers	11/18/2013- 11/20/2013 12/10/2013	Nov. 18th is the preferred date
12-cv-02711	Sarah Kate Moore, et al. v. Wolters Kluwer Health, Inc., et al.	Moore, Sarah Kate	Houston	Texas	Tracey Law Firm	12/12/2013 12/13/2013	
13-cv-02036	Suzanne Cordero, et al. v. Greenstone LLC, et al.	Cordero, Suzanne	Shady Cove	Oregon	Sanders Law Firm	11/15/2013 11/22/2013 12/6/2013	The provider depositions would have to be before the mother's as she is only free on Fridays.
12-cv-05123	Taylor v Pfizer (Conn)	Hawk, Julie	North Bend	Oregon	RCRSD	12/16/2013	
12-cv-02749	Thompson, et al. v. Wolters kluwer Health, Inc., et al.	Thompson, Shawna Christine	Tigard	Oregon	RCRSD	12/9/2013 12/10/2013	
12-cv-00247	Trenton V. Casl, et al. v. Wolters Kluwer Health Inc., et al.	Wietor, Kim	Milwaukee	Wisconsin	Blizzard & Nabers	11/14/2013 11/15/2013 11/19/2013 12/10/2013 12/11/2013 12/12/2013	

**Barbara Anderson**

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**From:** Barbara Anderson  
**Sent:** Thursday, November 14, 2013 7:13 PM  
**To:** 'Mark Cheffo'; Katherine Armstrong; Mara Cusker Gonzalez  
**Cc:** beachlawyer51@hotmail.com; 'Dianne Nast'  
**Subject:** Zoloft - Plaintiffs' Deposition Availability Schedule  
**Attachments:** Deposition Availability Schedule 11.14.13.pdf

Attached is a list of available dates that Plaintiffs' counsel have provided for Plaintiffs' depositions in Zoloft MDL 2342. I will update the list as I receive more dates from Plaintiffs' firms.

Thank you.  
Barbara

**Barbara Anderson**  
Paralegal



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ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

Case No.	Case Name	Deponent	City	State	Firm	Date Availability	Notes
13-cv-00724	Berg v. Pfizer, et al.	Berg, Sarah	Round Rock	Texas	RCRSD	12/03/2013 12/05/2013	
13-cv-00724	Berg v. Pfizer, et al.	Berg, Zate	Round Rock	Texas	RCRSD	12/03/2013 12/05/2013	
13-cv-02291	Breaux v. Pfizer Inc.	Breaux, Kathleen	Lake Charles	Louisiana	Sanders Law Firm	10/28/2013- 11/01/2013 11/11/2013- 11/22/2013	
12-cv-04577	Byington et al. v. Pfizer Inc.	Jade Byington	Boise	Idaho	Simmons Browder Gianaris Angelides & Barnerd	11/6/2013 11/7/2013 11/13/2013 11/14/2013 11/20/2013 11/21/2013	
12-cv-04577	Byington et al. v. Pfizer Inc.	Jason Byington	Boise	Idaho	Simmons Browder Gianaris Angelides & Barnerd	11/6/2013 11/7/2013 11/13/2013 11/14/2013 11/20/2013	
12-cv-00247	CasI, et al. v. Wolters Kluwer Health Inc., et al.	Wietor, Kim	Milwaukee	Wisconsin	Blizzard & Nabers	11/14/2013 11/15/2013 11/19/2013 12/10/2013 12/11/2013 12/12/2013	
13-cv-02272	Cooper v. Pfizer, Inc.	Cooper, Lora	Laconia	New Hampshire	Sanders Law Firm	11/12/2013- 11/15/2013 11/19/2013- 11/22/2013	If you chose a date at the later end of those weeks we are free to do the prescribing physicians earlier in the week, or conversely can do the client early in the week and the doctors later in the week.
13-cv-02272	Cooper v. Pfizer, Inc.	Prescribing Physicians	Laconia	New Hampshire	Sanders Law Firm	11/12/2013- 11/15/2013 11/19/2013- 11/22/2013	If you chose a date at the later end of those weeks we are free to do the prescribing physicians earlier in the week, or conversely can do the client early in the week and the doctors later in the week.
13-cv-02036	Cordero, et al. v. Greenstone LLC, et al.	Cordero, Suzanne	Shady Cove	Oregon	Sanders Law Firm	11/15/2013 11/22/2013 12/6/2013	The provider depositions would have to be before the mother's as she is only free on Fridays.



ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

13-cv-00365	Crabtree, et al. v. Pfizer, Inc.	Crabtree, Susan	Phoenix	Arizona	Motley Rice	11/14/2013 10:00 AM 12/10/2013 10:00 AM	Beginning at 10:00 am
13-cv-00365	Crabtree, et al. v. Pfizer, Inc.	Crabtree, Barry	Phoenix	Arizona	Motley Rice	11/15/2013 9:00 AM 12/11/2013 9:00 AM	Beginning at 9:00 am
13-cv-00593	Dennison v. Pfizer	Dennison, Felice	Austin	Texas	Reilly Pozner	11/25/2013 11/26/2013 12/12/2013 12/13/2013	
13-cv-00593	Dennison v. Pfizer	Dennison, Keith	Austin	Texas	Reilly Pozner	11/25/2013 11/26/2013 12/12/2013 12/13/2013	
13-cv-01224	DuBois, et al v. Pfizer, Inc.	Dubois, Nancy	Nashville	Tennessee	Bailey Perrin Bailey	12/11/2013- 12/20/2013	
12-cv-00218	Goulet, et al v. Pfizer, Inc., et al.	Jessica Goulet	Nashua	New Hampshire	Tracey Law Firm	11/14/2013 11/15/2013 12/12/2013 12/13/2013	
12-cv-00218	Goulet, et al v. Pfizer, Inc., et al.	Dana Goulet	Nashua	New Hampshire	Tracey Law Firm	11/14/2013 11/15/2013 12/12/2013 12/13/2013	
13-cv-02211	Harris v. Pfizer, Inc. et al.	Harris, Mya	Fort Wayne	Indiana	Andrews and Thornton Skikos Crawford	11/6/2013 11/13/2013 11/20/2013 12/2/2013 12/6/2013 12/9/2013 12/13/2013	
13-cv-02211	Harris v. Pfizer, Inc. et al.	Harris, Andrew	Fort Wayne	Indiana	Andrews and Thornton Skikos Crawford	12/2/2013 12/6/2013 12/9/2013 12/13/2013	
13-cv-02211	Harris v. Pfizer, Inc. et al.	Prescriber Chris Jackey CNM	Anderson	Indiana	Andrews and Thornton Skikos Crawford	12/5/2013 12/12/2013 12/16/2013	Prescriber's office address is 1931 Brown St, Anderson, IN 46016, and she has indicated this is fine for the depo.

ZOLOFT MDL 2342  
DEPOSITION AVAILABILITY

12-cv-02595	Long, et al. v. Wolters Kluwer Health, Inc., et al.	Long, Diedre	Tuscaloosa	Alabama	Beasley Allen	11/18/2013 11/19/2013 12/12/2013 12/13/2013 12/16/2013 12/17/2013	
12-cv-02595	Long, et al. v. Wolters Kluwer Health, Inc., et al.	Dr. Rump	Birmingham	Alabama	Beasley Allen	12/9/2013 12:00 PM (noon)	
13-cv-02197	Malek, et al. v. Pfizer, Inc., et al.	Malek, Lori	Stevens Point	Wisconsin	Meyerson & O'Neill	11/14/2013 11/19/2013 11/21/2013 11/26/2013 12/3/2013 12/5/2013 12/10/2013 12/12/2013	
12-cv-02683	McGoun, III, et al. v. Wolters Kluwer Health, Inc., et al.	Beckwith, Kayla	Pittsburgh	Pennsylvania	Blizzard & Nabers	11/18/2013- 11/20/2013 12/9/2013	Nov. 18th is the preferred date
12-cv-02683	McGoun, III, et al. v. Wolters Kluwer Health, Inc., et al.	McGoun, II, Russell	Pittsburgh	Pennsylvania	Blizzard & Nabers	11/18/2013- 11/20/2013 12/10/2013	Nov. 18th is the preferred date
12-cv-02711	Moore, et al. v. Wolters Kluwer Health, Inc., et al.	Moore, Sarah Kate	Houston	Texas	Tracey Law Firm	12/9/2013 - 12/13/2013	
12-cv-6934	Morgan, et al. v. Pfizer, Inc. (Dillard)	Dillard, Jennifer Leigh	Spartanburg	South Carolina	Napoli Bern	12/6/2013 9:00 AM EST	
12-cv-6934	Morgan, et al. v. Pfizer, Inc. (Keel)	Keel, April Victoria	Clinton	Louisiana	Napoli Bern	12/4/2013 9:00 AM CST	
12-cv-00241	Potts, et al. v. Pfizer, Inc.	Potts, Melissa Michelle	Post Falls	Idaho	Bailey Perrin Bailey	12/11/2013- 12/20/2013	
13-cv-00166	Saville, et al., v. Pfizer, Inc., et al.	Saville, Mary	Tampa	Florida	Blizzard & Nabers	11/6/2013 12/3/2013	
13-cv-00166	Saville, et al., v. Pfizer, Inc., et al.	Saville, Dave	Tampa	Florida	Blizzard & Nabers	11/7/2013 12/4/2013	
12-cv-05123	Taylor v Pfizer (Conn)	Hawk, Julie	North Bend	Oregon	RCRSD	12/16/2013	
12-cv-02749	Thompson, et al. v. Wolters Kluwer Health, Inc., et al.	Thompson, Shawna Christine	Tigard	Oregon	RCRSD	12/9/2013 12/10/2013	



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

<b>IN RE: ZOLOFT (SERTRALINE HYDROCHLORIDE) PRODUCTS LIABILITY LITIGATION</b>	:	<b>MDLNO. 2342 12-MD-2342</b>
<b>THIS DOCUMENT APPLIES TO: ALL ACTIONS</b>	:	<b>HON. CYNTHIA M. RUFÉ</b>
	:	
	:	
	:	
	:	
	:	

**CERTIFICATE OF SERVICE**

I, Mark P. Robinson, Jr., Esquire, hereby certify that a true and correct copy of Plaintiffs’ Motion to Modify the Trial Pool Case Selection Process and the Declaration of Mark P. Robinson, Jr. in Support of Plaintiffs’ Motion to Modify the Trial Pool Case Selection Process was filed electronically. Notice of this filing will be sent by operation of the Court’s electronic filing system as indicated on the electronic filing receipt. This document so filed is available for viewing and downloading on the Court’s electronic filing system.

I declare that I am a registered Filing User for this District of the United States District Court. 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 27, 2013, at Newport Beach, California.

/s/ Mark P. Robinson, Jr.  
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  
[mrobinson@rcrlaw.net](mailto:mrobinson@rcrlaw.net)