

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

GILDA HAGAN-BROWN

Plaintiff,

v.

ELI LILLY AND COMPANY, an Indiana
corporation,

Defendant.

CASE NO.: 1:14-CV-01614

**DEFENDANT’S RESPONSES TO PLAINTIFF’S FIRST SET OF REQUESTS FOR
PRODUCTION OF DOCUMENTS**

Defendant Eli Lilly and Company (“Defendant” or “Lilly”) hereby submits its responses to Plaintiff’s First Set of Requests for Production, as follows:

GENERAL STATEMENT

The following responses are subject to Lilly’s Objections to Plaintiff’s First Set of Requests for Production served on February 23, 2015 pursuant to Federal Rule of Civil Procedure 34 and Local Civil Rule 26 and, for the sake of brevity, not repeated herein. Lilly has not fully completed its investigation of the facts relating to this case, its discovery, or its preparation for trial. Both discovery and independent investigation are ongoing. Therefore, all responses contained herein are based solely upon such information and documents as are both presently available and specifically known to Lilly. Lilly reserves the right to supplement these responses as discovery and this investigation proceed. Lilly’s responses are in accordance with the requirements of the Federal Rules of Civil Procedure, the Local Rules, and any applicable Court Orders.

SPECIFIC RESPONSES TO REQUESTS FOR PRODUCTION

I. FDA DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

Please produce the Electronic Common Technical Document (eCTD) or equivalent electronic submission for all CYMBALTA indications, whether that indication was approved or denied, including but not limited to: Major Depressive Disorder (MDD), Generalized Anxiety Disorder (GAD), Neuropathic Pain from Diabetes, Chronic Pain, Chronic Musculoskeletal Pain, Fibromyalgia, MDD Maintenance, GAD Maintenance, and Stress Urinary Incontinence (SUI).

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that its Investigational New Drug ("IND") submission and New Drug Application ("NDA") submissions to FDA for Cymbalta indications can be found in Lilly's existing production at CYM-00000001 - CYM-01725262; CYM-01737200 - CYM-01737203; CYM-01737265 - CYM-01757110; and CYM-01757111 - CYM-01758619.

REQUEST FOR PRODUCTION NO. 2:

Please produce the Summary Basis of Approval for CYMBALTA for the following indications: Major Depressive Disorder (MDD), Generalized Anxiety Disorder (GAD), Neuropathic Pain from Diabetes, Chronic Pain, Chronic Musculoskeletal Pain, Fibromyalgia, MDD Maintenance, and GAD Maintenance.

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 3:

Please produce all Periodic Safety Updates regarding CYMBALTA for the following indications: Major Depressive Disorder (MDD), Generalized Anxiety Disorder (GAD), Neuropathic Pain from Diabetes, Chronic Pain, Chronic Musculoskeletal Pain, Fibromyalgia, MDD Maintenance, and GAD Maintenance.

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that its Periodic Safety Update Reports can be found in its existing production at CYM-00715114 - CYM-00717615; CYM-00719282 - CYM-01102877; CYM-00861952 - CYM-00862115; CYM-00857864 - CYM-00860751; CYM-00947704- CYM-00951649; CYM-00963610 - CYM-009674548; CYM-01103692 - CYM-001106656; CYM-01099044 - CYM-01102877; CYM-01117943 - CYM-01122174; CYM-00131805 - CYM-00140607; CYM-00289558 - CYM-00299778; CYM-00331576 - CYM-00342389; and CYM-00512955 - CYM-00525732.

REQUEST FOR PRODUCTION NO. 4:

Please produce all Annual Safety Updates regarding CYMBALTA for the following indications: Major Depressive Disorder (MDD), Generalized Anxiety Disorder (GAD), Neuropathic Pain from Diabetes, Chronic Pain, Chronic Musculoskeletal Pain, Fibromyalgia, MDD Maintenance, and GAD Maintenance.

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 3

REQUEST FOR PRODUCTION NO. 5:

Please produce the electronic Investigational New Drug (“IND”) file for CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

Subject to and without waiving its Objections to Plaintiff’s First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 1.

REQUEST FOR PRODUCTION NO. 6:

Please produce all warning letters sent to YOU from the FDA regarding CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

Subject to and without waiving its Objections to Plaintiff’s First Set of Requests for Production, Lilly responds that letters it received from FDA’s Division of Drug Marketing, Advertising, and Communications (“DDMAC”) regarding Cymbalta can be found in its existing production at CYM-01236531 - CYM-01236535; CYM-1250524 - CYM-01250531; and CYM-01735325 - CYM-01735329; CYM-01735321 - CYM-01735324. Additional letters are publicly available at

<http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/EnforcementActivitiesbyFDA/WarningLettersandNoticeofViolationLetterstoPharmaceuticalCompanies/default.htm>

REQUEST FOR PRODUCTION NO. 7:

Please produce YOUR responses to all warning letters sent to YOU from the FDA regarding CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

Subject to and without waiving its Objections to Plaintiff’s First Set of Requests for Production, Lilly responds that its responses to letters it received from FDA’s DDMAC

regarding Cymbalta can be found in its existing production at CYM-01737172; CYM-01258099 - CYM-01258103; CYM-01258154 - CYM-01258160; and CYM-01737181 - CYM-01737199; CYM-01737173 - CYM-01737177; CYM-01735315 - CYM-01735320; and CYM-01735309 - CYM-01735314.

REQUEST FOR PRODUCTION NO. 8:

Please produce the transcript of any FDA Advisory Committee meetings regarding CYMBALTA for any indication.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 9:

Please produce any DOCUMENTS submitted to the FDA as part of any Advisory Committee meeting related to CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9:

Lilly refers Plaintiff to its objections this Request.

REQUEST FOR PRODUCTION NO. 10:

Please produce any and all Form 483 and/or Warning Letters that YOU received from the FDA related to CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 10:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 6.

REQUEST FOR PRODUCTION NO. 11:

Please produce YOUR responses to all Form 483 and/or Warning Letters that YOU received from the FDA related to CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 11:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 7.

REQUEST FOR PRODUCTION NO. 12:

Please produce all DOCUMENTS reflecting any settlements, agreements, resolutions, fines, sanctions and/or additional regulatory actions that arose as a result of the Form 483 and/or Warning Letters that YOU received from the FDA related to CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 12:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its responses to Requests Nos. 6 and 7. Beyond the resolutions described therein, there were no additional regulatory actions that arose as a result of letters Lilly received from DDMAC related to Cymbalta.

REQUEST FOR PRODUCTION NO. 13:

Please produce all DOCUMENTS related to any COMMUNICATIONS with the FDA about CYMBALTA containing any of the following terms (or any derivative term): DEAE, withdrawal, discontinuation or discontinuing, dependence, habit-forming, addiction, quitting, tapering, brain zaps, electric shock, down regulation, half-life, missed dose, "greater than or equal to," Perahia, Rosenbaum, or Schatzberg.

RESPONSE TO REQUEST FOR PRODUCTION NO. 13:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 14:

Please produce all DOCUMENTS related to any COMMUNICATIONS with the FDA about Prozac or fluoxetine containing any of the following terms (or any derivative term): DEAE, withdrawal, discontinuation or discontinuing, dependence, habit-forming, addiction, quitting, tapering, brain zaps, electric shock, down regulation, half-life, missed dose, “greater than or equal to,” Perahia, Rosenbaum, or Schatzberg.

RESPONSE TO REQUEST FOR PRODUCTION NO. 14:

Subject to and without waiving its Objections to Plaintiff’s First Set of Requests for Production, Lilly responds that documents relating to Prozac can be found in its existing production at CYMPRO-0000000001 - CYMPRO-0000053299.

REQUEST FOR PRODUCTION NO. 15:

Please produce all DOCUMENTS related to any COMMUNICATIONS with the FDA about Zyprexa or olanzapine containing any of the following terms (or any derivative term): DEAE, withdrawal, discontinuation or discontinuing, dependence, habit-forming, addiction, quitting, tapering, brain zaps, electric shock, down regulation, half-life, missed dose, “greater than or equal to,” Perahia, Rosenbaum, or Schatzberg.

RESPONSE TO REQUEST FOR PRODUCTION NO. 15:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 16:

Please produce all DOCUMENTS reflecting COMMUNICATIONS with the FDA about the section of the US LABEL titled “Discontinuation of Treatment with Cymbalta.”

RESPONSE TO REQUEST FOR PRODUCTION NO. 16:

Subject to and without waiving its Objections to Plaintiff’s First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 1.

REQUEST FOR PRODUCTION NO. 17:

Please produce all DOCUMENTS reflecting COMMUNICATIONS with the FDA about the sections of the US LABEL titled “Dosage and Administration” or “Medication Administration” or “Information for Patients” (depending on year).

RESPONSE TO REQUEST FOR PRODUCTION NO. 17:

Subject to and without waiving its Objections to Plaintiff’s First Set of Requests for Production, Lilly refers Plaintiff to its responses to Requests Nos. 1 and 16.

REQUEST FOR PRODUCTION NO. 18:

Please produce all DOCUMENTS that reflect COMMUNICATIONS between LILLY and the FDA concerning LILLY’s Medical Information Letters, or similar letters, concerning the potential risk of withdrawal or discontinuation from CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 18:

Subject to and without waiving its Objections to Plaintiff’s First Set of Requests for Production, Lilly responds that medical information letters concerning Cymbalta and discontinuation-emergent adverse events can be found in its existing production at CYM-01727818 - CYM-01727884 and CYM-01766604 - CYM-01766611.

REQUEST FOR PRODUCTION NO. 19:

Please produce all COMMUNICATIONS between YOU and the FDA concerning the half-life of CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 19:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its responses to Requests Nos. 1, 16, and 17.

REQUEST FOR PRODUCTION NO. 20:

Please produce all COMMUNICATIONS between YOU and the FDA concerning the enteric coating of CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its responses to Requests Nos. 1, 16, 17, and 19.

REQUEST FOR PRODUCTION NO. 21:

Please produce a copy of each FDA-approved version of the package insert for CYMBALTA used by LILLY since it began marketing CYMBALTA in the United States.

RESPONSE TO REQUEST FOR PRODUCTION NO. 21:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds Lilly refers Plaintiff to Attachment E, which identifies the Bates numbers corresponding to each FDA-approved version of the Cymbalta package insert that could be located through a reasonably diligent search. Additional FDA-approved versions of the Cymbalta package insert are publicly available here:

<http://www.accessdata.fda.gov/scripts/cder/drugsatfda/index.cfm?fuseaction=Search.Overview&>

DrugName=CYMBALTA&CFID=7507737&CFTOKEN=e8433ca4c6d9e77f-EE76B6D9-D59C-F73B-4B4ACFD7754D8B36

REQUEST FOR PRODUCTION NO. 22:

Please produce a copy of each version of the LABEL for CYMBALTA in each foreign country wherein CYMBALTA was approved for marketing in that country.

RESPONSE TO REQUEST FOR PRODUCTION NO. 22:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that it will produce responsive documents that can be identified through a reasonably diligent search of its BLUE and REGULUS databases, which include approved labeling for Cymbalta submitted to the repositories by Lilly's global affiliates since November 2008.

REQUEST FOR PRODUCTION NO. 23:

Please produce the electronic Adverse Event Reporting database for CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to Attachment B, which provides the Bates numbers corresponding to reports made to FDA of adverse events potentially linked to Cymbalta, including so-called "MedWatch" forms. Lilly further refers Plaintiff to CYM-02055041-CYM-02055073, which constitutes Cymbalta postmarketing adverse event data from the Lilly Safety System for serious, unlisted events coded with at least one of the terms "drug withdrawal convulsions," "drug withdrawal headache," "drug withdrawal syndrome," "withdrawal hypertension," or "withdrawal syndrome."

II. INTERNAL COMMUNICATIONS ABOUT CYMBALTA

REQUEST FOR PRODUCTION NO. 24:

Please produce all DOCUMENTS reflecting LILLY's internal COMMUNICATIONS and/or deliberations concerning the section of the US CYMBALTA LABEL titled "Discontinuation of Treatment with Cymbalta," including not limited to all emails, memorandums, drafts, comments, edits, redlines, or discussions about those edits of those sections of the US CYMBALTA LABEL.

RESPONSE TO REQUEST FOR PRODUCTION NO. 24:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 25:

Please produce all DOCUMENTS reflecting LILLY's internal COMMUNICATIONS and/or deliberations concerning the section of the US CYMBALTA LABEL titled "Dosage and Administration" or "Medication Administration" or "Information for Patients" (depending on year), including not limited to all emails, memorandums, drafts, comments, edits, redlines, or discussions about those edits of the that section of the US CYMBALTA LABEL.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 26:

Please produce all DOCUMENTS reflecting LILLY's internal COMMUNICATIONS and/or deliberations concerning the following sentences in the US CYMBALTA LABEL as it was approved in 2004, including but not limited to all emails, memorandums, drafts, comments, edits, redlines, or discussions about those edits: "Duloxetine should be swallowed whole and

should not be chewed or crushed, nor should the contents be sprinkled on food or mixed with liquids. All of these might affect the enteric coating.”

RESPONSE TO REQUEST FOR PRODUCTION NO. 26:

Lilly refers Plaintiff to its objections this Request.

REQUEST FOR PRODUCTION NO. 27:

Please produce all DOCUMENTS that reflect LILLY’s reason for changing the US LABEL concerning “Discontinuation of Treatment with Cymbalta” in 2008 from “the following symptoms occurred at a rate greater than or equal to 2%” to “the following symptoms occurred at a rate greater than or equal to 1%.”

RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

Subject to and without waiving its Objections to Plaintiff’s First Set of Requests for Production, Lilly refers Plaintiff to its response to Interrogatory No. 14.

REQUEST FOR PRODUCTION NO. 28:

Please produce all DOCUMENTS that reflect LILLY’s reason for adding to the 2009 US CYMBALTA LABEL “or tapered” in the context of “Following abrupt ... discontinuation ...” in the section titled “Discontinuation of Treatment with Cymbalta.”

RESPONSE TO REQUEST FOR PRODUCTION NO. 28:

Subject to and without waiving its Objections to Plaintiff’s First Set of Requests for Production, Lilly refers Plaintiff to its response to Interrogatory No. 15.

REQUEST FOR PRODUCTION NO. 29:

Please produce all DOCUMENTS that reflect LILLY's reason for changing the US CYMBALTA LABEL in 2012 from "the following symptoms occurred at a rate greater than or equal to 1%" to "at 1% or greater" in the section titled "Discontinuation of Treatment with Cymbalta."

RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 30:

Please produce all DOCUMENTS that reflect LILLY's reason for creating CYMBALTA as capsules containing enteric-coated pellets of duloxetine hydrochloride.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 31:

Please produce all DOCUMENTS reflecting LILLY's internal COMMUNICATIONS and/or deliberations concerning the design of CYMBALTA as enteric-coated pellets contained within a capsule.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 32:

Please produce all DOCUMENTS reflecting LILLY's internal COMMUNICATIONS and/or deliberations concerning the development of a dosage of CYMBALTA below 20mg.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 33:

Please produce all DOCUMENTS reflecting LILLY's internal COMMUNICATIONS and/or deliberations concerning the development of CYMBALTA as a scored tablet.

RESPONSE TO REQUEST FOR PRODUCTION NO. 33:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 34:

Please produce all memoranda, presentations, and/or reports, whether prepared internally or provided to LILLY by a third-party, that discuss, in any way, CYMBALTA and WITHDRAWAL.

RESPONSE TO REQUEST FOR PRODUCTION NO. 34:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that it has already produced a significant amount of documents responsive to this request and such documents can be found in Lilly's existing production, and Lilly refers Plaintiff to the following documents as examples: CYM-01928754 - CYM-01928834; CYM-01952646 - CYM-01952676; CYM-02156153 - CYM-02156171; CYM-01952953 - CYM-01962959; CYM-01782498 - CYM-01782503

REQUEST FOR PRODUCTION NO. 35:

Please produce all electronic mail ("email") for the individuals identified in Interrogatory Nos. 1 & 3, whether internal or external and whether on LILLY's current computer operating

system, on individual employees' laptop computers, or archive systems, which contain at least one of the following terms:

Cy!, dulo!, Ariclaim, Xeristar, Yentreve, Duzela, Dulane, Cymgen, Prozac, Fluox!, Paxil, Parox!, Zoloft, Sertra!, Celexa, Citalop!, Lexapro, Escitalop!, Effexor, venlafa!, Pristiq, desvenlafax!, milnacipr!, levomilnacipr!, SSRI!, SNRI!, or anti!,

and at least one of the following terms:

DEAE!, discon!, withd!, taper!, cold w/1turkey, addict!, habit!, paresth!, zap!, electric w/4 shock, dizz!, Rosenbaum, Schatzberg, Glenmullen, half-life, "missed dose," downregu!, "greater than or equal to," Perahia, enteric, pellets, "delayed release."

RESPONSE TO REQUEST FOR PRODUCTION NO. 35:

Lilly refers Plaintiff to its objections to this Request and its objections to Interrogatories Nos. 1 and 3.

REQUEST FOR PRODUCTION NO. 36:

Please produce all DOCUMENTS that reflect LILLY's internal COMMUNICATIONS and/or deliberations concerning any and all letters used by LILLY to respond to inquiries regarding CYMBALTA and DEAEs, discontinuation, withdrawal, dependence, or addiction.

RESPONSE TO REQUEST FOR PRODUCTION NO. 36:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 37:

Please produce all DOCUMENTS that reflect LILLY's internal COMMUNICATIONS and/or deliberations concerning any of LILLY's Medical Information Letters, or similar letters, concerning the potential risk of withdrawal or discontinuation from CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 37:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 18.

REQUEST FOR PRODUCTION NO. 38:

Please produce all minutes of meetings of any LILLY committee, working group, department, board, etc. where CYMBALTA and WITHDRAWAL were discussed.

RESPONSE TO REQUEST FOR PRODUCTION NO. 38:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 39:

Please produce all DOCUMENTS that reflect LILLY's internal COMMUNICATIONS and/or deliberations concerning why the rate of WITHDRAWAL reflected in the PERAHIA article was not included in the US LABEL.

RESPONSE TO REQUEST FOR PRODUCTION NO. 39:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 40:

Please produce all DOCUMENTS that reflect LILLY's internal COMMUNICATIONS and/or deliberations concerning why the rate of WITHDRAWAL reflected in the PERAHIA article was included in the European LABEL.

RESPONSE TO REQUEST FOR PRODUCTION NO. 40:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to CYM-01865850 - CYM-01865854 and its response to Interrogatory No. 17.

REQUEST FOR PRODUCTION NO. 41:

Please produce all DOCUMENTS that reflect LILLY's internal COMMUNICATIONS concerning discontinuation or withdrawal symptoms upon discontinuation of Effexor, including but not limited to any discussion concerning the language contained in the US Effexor LABEL concerning WITHDRAWAL.

RESPONSE TO REQUEST FOR PRODUCTION NO. 41:

Lilly refers Plaintiff to its objections to this Request.

III. COMMUNICATIONS WITH MEDICAL PROFESSIONALS

REQUEST FOR PRODUCTION NO. 42:

Please produce any "Dear Healthcare Professional" or similar letters to doctors, pharmacies or other groups, organizations about CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 42:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that its Dear Healthcare Professional letter concerning Cymbalta can be found in its existing production at CYM-01737200 - CYM-01737201.

REQUEST FOR PRODUCTION NO. 43:

Please produce all DOCUMENTS that contain a record or description of COMMUNICATIONS to LILLY from MEDICAL PROFESSIONALS or the public, including but not limited to call logs, inquiring about CYMBALTA that mention DEAEs, withdrawal, discontinuation or discontinuing, dependence, habit-forming, addiction, quitting, tapering, brain zaps, electric shock, down regulation, half-life (or any related or derivative terms).

RESPONSE TO REQUEST FOR PRODUCTION NO. 43:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that documents reflecting communications from health care professionals and consumers can be found in Lilly's existing production at CYM-02777356 - CYM-02777616.

REQUEST FOR PRODUCTION NO. 44:

Please produce any and all letters used by LILLY to respond to inquiries regarding CYMBALTA and DEAEs, discontinuation, withdrawal, dependence, or addiction.

RESPONSE TO REQUEST FOR PRODUCTION NO. 44:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 18.

REQUEST FOR PRODUCTION NO. 45:

Please produce a copy of each and every version of LILLY's "Medical Information Letter" or similar letters to doctors, pharmacies or other groups, organizations or entities discussing the potential risk of withdrawal or discontinuation from CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 45:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its responses to Requests Nos. 18 and 44.

REQUEST FOR PRODUCTION NO. 46:

Please produce all DOCUMENTS that identify MEDICAL PROFESSIONALS to whom LILLY sent a Medical Information Letter concerning the potential risk of withdrawal or discontinuation from CYMBALTA (e.g., an Excel spreadsheet or Access spreadsheet).

RESPONSE TO REQUEST FOR PRODUCTION NO. 46:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 47:

Please produce any and all DOCUMENTS that reflect each inquiry from a MEDICAL PROFESSIONAL concerning Cymbalta and withdrawal or discontinuation, including but not limited to written letters, telephone calls, online requests, sales representative relay.

RESPONSE TO REQUEST FOR PRODUCTION NO. 47:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 43.

IV. MEDICAL LITERATURE AND CONTINUING MEDICAL EDUCATION

REQUEST FOR PRODUCTION NO. 48:

Please produce all publication plans for CYMBALTA, whether prepared internally or by a third-party.

RESPONSE TO REQUEST FOR PRODUCTION NO. 48:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that it will produce publication plans for Cymbalta that can be located through a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 49:

Please produce all DOCUMENTS reflecting LILLY's involvement in the drafting, editing, and publication the PERAHIA ARTICLE, including but not limited to all email communications, article drafts, and publication plans relating to the PERAHIA ARTICLE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 49:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 50:

Please produce the study protocol and final study reports for each of the CYMBALTA trials discussed in the PERAHIA ARTICLE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 50:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that the study protocols and final study reports for each of the Cymbalta trials discussed in the PERAHIA ARTICLE can be found in Lilly's existing production at CYM-01020818 - CYM-01033963; CYM-01054242 - CYM-01057304; CYM-01033964 - CYM-01035948; CYM-01028897 - CYM-01030817; CYM-01057305 - CYM-01059489; CYM-01026706 - CYM-01028896; CYM-01059490 - CYM-01078316; CYM-00870792 - CYM-00876204; that CYM-01493802 - CYM-01531668.

REQUEST FOR PRODUCTION NO. 51:

Please produce the raw data, including but not limited to the case report forms for each of the CYMBALTA trials discussed in the PERAHIA ARTICLE.

RESPONSE TO REQUEST FOR PRODUCTION NO. 51:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 52:

Please produce all DOCUMENTS reflecting the amount of compensation given to the authors of the PERAHIA ARTICLE, including but not limited to non-listed authors in the final publication.

RESPONSE TO REQUEST FOR PRODUCTION NO. 52:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 53:

Please produce a copy of the articles identified in Interrogatories Nos. 18 & 19.

RESPONSE TO REQUEST FOR PRODUCTION NO. 53:

Lilly refers Plaintiff to its objections to this Request and its objections to Interrogatories Nos. 18 and 19.

REQUEST FOR PRODUCTION NO. 54:

Please produce all DOCUMENTS reflecting LILLY's involvement in the drafting, editing, and publication of those articles identified in Interrogatories Nos. 18 & 19.

RESPONSE TO REQUEST FOR PRODUCTION NO. 54:

Lilly refers Plaintiff to its objections to this Request and its objections to Interrogatories Nos. 18 and 19.

REQUEST FOR PRODUCTION NO. 55:

Please produce all DOCUMENTS reflecting the amount of compensation given to the authors of those articles identified in Interrogatories Nos. 18 &19, including but not limited to compensation associated with the article's publication. In lieu of producing these documents, Plaintiff would accept an Excel chart listing each author and the total amount of compensation received by that author by LILLY, by year.

RESPONSE TO REQUEST FOR PRODUCTION NO. 55:

Lilly refers Plaintiff to its objections to this Request and its objections to Interrogatories Nos. 18 and 19.

REQUEST FOR PRODUCTION NO. 56:

Please produce all DOCUMENTS reflecting any communications between LILLY and the authors of the articles identified in Interrogatories Nos. 18 &19 concerning discontinuation or withdrawal symptoms upon discontinuation of any SSRI or SNRI, including but not limited to CYMBALTA, Effexor, Prozac, Paxil and Zoloft.

RESPONSE TO REQUEST FOR PRODUCTION NO. 56:

Lilly refers Plaintiff to its objections to this Request and its objections to Interrogatories Nos. 18 and 19.

REQUEST FOR PRODUCTION NO. 57:

Please produce all DOCUMENTS reflecting any COMMUNICATIONS between LILLY and Mario Fava concerning discontinuation or withdrawal symptoms upon discontinuation of any SSRI or SNRI, including but not limited to CYMBALTA, Effexor, Prozac, Paxil and Zoloft.

RESPONSE TO REQUEST FOR PRODUCTION NO. 57:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to Dr. Fava's third-party production: FAVA-001 - FAVA-144.

REQUEST FOR PRODUCTION NO. 58:

Please produce all DOCUMENTS reflecting any COMMUNICATIONS between LILLY and Jerrold Rosenbaum concerning discontinuation or withdrawal symptoms upon discontinuation of any SSRI or SNRI, including but not limited to CYMBALTA, Effexor, Prozac, Paxil and Zoloft.

RESPONSE TO REQUEST FOR PRODUCTION NO. 58:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to Dr. Rosenbaum's third-party production: ROSENBAUM-0001 - ROSENBAUM-0014.

REQUEST FOR PRODUCTION NO. 59:

Please produce all DOCUMENTS reflecting any COMMUNICATIONS between LILLY and Peter Haddad concerning discontinuation or withdrawal symptoms upon discontinuation of any SSRI or SNRI, including but not limited to CYMBALTA, Effexor, Prozac, Paxil and Zoloft.

RESPONSE TO REQUEST FOR PRODUCTION NO. 59:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 60:

Please produce all DOCUMENTS reflecting any communications between LILLY and Alan Schatzberg concerning discontinuation or withdrawal symptoms upon discontinuation of any SSRI or SNRI, including but not limited to CYMBALTA, Effexor, Prozac, Paxil and Zoloft.

RESPONSE TO REQUEST FOR PRODUCTION NO. 60:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 61:

Please produce all CYMBALTA clinical trials wherein DEAEs or withdrawal symptoms were measured, noted, calculated, or where data concerning DEAEs or withdrawal was obtained, regardless of whether measuring DEAEs or withdrawal symptoms was part of the trial's original protocol. Please note this request is not limited in time (i.e., pre-approval or post-approval), geography (i.e., location of the study or clinical trial), type (i.e., placebo-controlled, active-controlled, or open), authorship (i.e., LILLY-sponsored or conducted by a third-party), or whether the trial was FDA-sanctioned. This request seeks all DEAE or withdrawal clinical data within LILLY's possession.

RESPONSE TO REQUEST FOR PRODUCTION NO. 61:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to Attachment A, which identifies the Bates numbers corresponding to Cymbalta clinical trials located through a reasonably diligent search of Lilly's existing production. They are organized generally according to the NDA to which they relate and include, among others, clinical trials that measured discontinuation-emergent adverse events.

REQUEST FOR PRODUCTION NO. 62:

Please produce any presentations, PowerPoint presentations, memoranda, product brochures / marketing materials, and/or audio/video recordings, used by LILLY with regard to CYMBALTA that mention the potential risk of withdrawal or discontinuation from CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 62:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its responses to Requests Nos. 34 and 67. Lilly further responds that responsive materials can be found in Lilly's existing production and refers Plaintiff to the following documents as examples: CYM-01754727 - CYM-01754761; CYM-01726950 - CYM-01726961; CYM-01726905 - CYM-01726916; and CYM-01743625 - CYM-01743650.

REQUEST FOR PRODUCTION NO. 63:

Please produce all Continuing Medical Education ("CME") presentations or programs, including those DOCUMENTS given to attendees of CMEs, sponsored or created by YOU that mention DEAEs, withdrawal, discontinuation, dependence or addiction, whether related to CYMBALTA or not, including but not limited to presentations that reference Prozac / fluoxetine and/or Effexor / venlafaxine.

RESPONSE TO REQUEST FOR PRODUCTION NO. 63:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that materials from Lilly-sponsored Continuing Medical Education presentations or programs related to Cymbalta or Prozac can be found in Lilly's existing production and refers Plaintiff to the follow documents as examples: CYMPRO-0000053089 -

CYMPRO-0000053118; CYMPRO-0000053220 - CYMPRO-0000053253; CYMPRO-0000053254 - CYMPRO-0000053297; and CYM-02051103 - CYM-02051117.

REQUEST FOR PRODUCTION NO. 64:

Please produce DOCUMENTS which list, in whatever interval those lists were compiled, key opinion leaders / thought leaders related to CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 64:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that information about non-employee doctors associated with Lilly in relation to Cymbalta can be found in Faculty Reports, Contract Status Reports, and Activity Detail Reports that can be found within its existing production at CYM-02739356 - CYM-02777355.

REQUEST FOR PRODUCTION NO. 65:

Please produce all DOCUMENTS reflecting any agreement with a key opinion leader / thought leader related to CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 65:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 66:

Please produce all DOCUMENTS reflecting any compensation given to a key opinion leader / thought leader related to CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 66:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 64.

V. SALES AND MARKETING

REQUEST FOR PRODUCTION NO. 67:

Please produce all television commercials for CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 67:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to Attachment C, which identifies the Bates numbers corresponding to examples of Cymbalta advertisements, promotional materials, and related documents.

REQUEST FOR PRODUCTION NO. 68:

Please produce all radio commercials for CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 68:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 67.

REQUEST FOR PRODUCTION NO. 69:

Please produce all advertisements in magazines for CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 69:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 67.

REQUEST FOR PRODUCTION NO. 70:

Please produce all advertisements on the internet for CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 70:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 67.

REQUEST FOR PRODUCTION NO. 71:

Please produce all press releases ever issued by LILLY with regard to CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 71:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that Lilly press releases are publicly available at <http://lilly.mediaroom.com/>

REQUEST FOR PRODUCTION NO. 72:

Please produce all COMMUNICATIONS with WebMD regarding CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 72:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 73:

Please produce every marketing plan, including all drafts, for CYMBALTA, regardless of whether that plan was prepared internally or by a third-party.

RESPONSE TO REQUEST FOR PRODUCTION NO. 73:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that brand plans for Cymbalta can be found in Lilly's existing

production and refers to the following documents as examples: CYM-01725585 - CYM-01725610; CYM-01725697 - CYM-01725756; CYM-01726046 - CYM-01726052; CYM-02302344 - CYM-02302350.

REQUEST FOR PRODUCTION NO. 74:

Please produce any report or DOCUMENT reflecting the effectiveness of LILLY's marketing campaigns for CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 74:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 75:

Please produce every business plan, including all drafts, for CYMBALTA, regardless of whether that plan was prepared internally or by a third-party.

RESPONSE TO REQUEST FOR PRODUCTION NO. 75:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 73.

REQUEST FOR PRODUCTION NO. 76:

Please produce every launch plan, including all drafts, for CYMBALTA, regardless of whether that plan was prepared internally or by a third-party.

RESPONSE TO REQUEST FOR PRODUCTION NO. 76:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 77:

Please produce all COMMUNICATIONS between LILLY and any third-party marketing company or consultant concerning CYMBALTA's direct-to-consumer marketing that discusses, in any way, WITHDRAWAL.

RESPONSE TO REQUEST FOR PRODUCTION NO. 77:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 78:

Please produce all COMMUNICATIONS between LILLY and any third-party marketing company or consultant concerning CYMBALTA's direct-to-consumer marketing that discusses, in any way, once-a-day versus twice-a-day dosing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 78:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 79:

Please produce all DOCUMENTS reflecting any contract or agreement between LILLY and a third-party company or consultant related to CYMBALTA's direct-to-consumer marketing.

RESPONSE TO REQUEST FOR PRODUCTION NO. 79:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 80:

Please produce all market surveys and focus group results / summaries for CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 80:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that it will produce market surveys and related materials concerning Cymbalta and discontinuation-emergent adverse events, if any, that can be located through a reasonably diligent search.

REQUEST FOR PRODUCTION NO. 81:

Please produce all versions of materials and DOCUMENTS, including but not limited to videos or audio recordings, used to train LILLY pharmaceutical representatives about CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 81:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to Attachment D, which identifies the Bates numbers corresponding to Lilly's standard operating procedures ("SOPs"). Lilly further refers Plaintiff to training materials for sales representatives relating to Cymbalta, which can be found in its existing production at CYM-01728139- CYM-01732494.

REQUEST FOR PRODUCTION NO. 82:

Please produce DOCUMENTS reflecting LILLY's policies and practices regarding communicating with a MEDICAL PROFESSIONAL by a LILLY pharmaceutical representative.

RESPONSE TO REQUEST FOR PRODUCTION NO. 82:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 81.

REQUEST FOR PRODUCTION NO. 83:

Please produce exemplars of samples of CYMBALTA that were left with MEDICAL PROFESSIONALS by LILLY pharmaceutical representatives.

RESPONSE TO REQUEST FOR PRODUCTION NO. 83:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that it will produce exemplars of the packaging and accompanying materials for samples of Cymbalta.

REQUEST FOR PRODUCTION NO. 84:

Please produce all marketing or promotional materials used with MEDICAL PROFESSIONALS by LILLY pharmaceutical representatives, regardless of whether that material was left with the MEDICAL PROFESSIONAL or not.

RESPONSE TO REQUEST FOR PRODUCTION NO. 84:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 67.

REQUEST FOR PRODUCTION NO. 85:

Please produce DOCUMENTS reflecting LILLY's policies and practices regarding the showing of medical journal articles to MEDICAL PROFESSIONALS by a LILLY pharmaceutical representative.

RESPONSE TO REQUEST FOR PRODUCTION NO. 85:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 81.

REQUEST FOR PRODUCTION NO. 86:

Please produce all medical journal articles used by LILLY pharmaceutical representatives to promote CYMBALTA.

RESPONSE TO REQUEST FOR PRODUCTION NO. 86:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 81, which includes reprints of journal articles for use with medical professionals, for example CYM-01092327 - CYM-01092345 and CYM-01092356 - CYM-1092367.

REQUEST FOR PRODUCTION NO. 87:

Please produce all DOCUMENTS that reflect COMMUNICATIONS between LILLY and the media about CYMBALTA and WITHDRAWAL.

RESPONSE TO REQUEST FOR PRODUCTION NO. 87:

Lilly refers Plaintiff to its objections to this Request.

VI. CLIENT-SPECIFIC REQUESTS

REQUEST FOR PRODUCTION NO. 88:

Please produce all DOCUMENTS reflecting any COMMUNICATION between LILLY and the following:

- Dr. Mohammed Bahadori (prescriber) Arthritis Care Center, P.C.
14904 Jefferson Davis Hwy, Suite 203
Woodbridge, VA 22192
(703) 492-6660

RESPONSE TO REQUEST FOR PRODUCTION NO. 88:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that it will produce documents that can be located through a reasonably diligent search reflecting communication between Lilly and Dr. Bahadori.

REQUEST FOR PRODUCTION NO. 89:

Please produce the custodial file, including but not limited to employment agreements, termination agreements, performance reviews, self-reviews, W-2s, and bonus amounts, for each pharmaceutical representative who called upon the following:

- Dr. Mohammed Bahadori (prescriber) Arthritis Care Center, P.C.
14904 Jefferson Davis Hwy, Suite 203
Woodbridge, VA 22192
(703) 492-6660

RESPONSE TO REQUEST FOR PRODUCTION NO. 89:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 90:

Please produce all records, entries, or other data from YOUR pharmaceutical representative database, or any other electronic database used to track sales calls to physicians, regarding each and every sales call made to following:

- Dr. Mohammed Bahadori (prescriber) Arthritis Care Center, P.C.
14904 Jefferson Davis Hwy, Suite 203
Woodbridge, VA 22192
(703) 492-6660

RESPONSE TO REQUEST FOR PRODUCTION NO. 90:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that it will produce documents that can be located through a reasonably diligent search tracking sales calls to Drs. Bahadori related to Cymbalta.

REQUEST FOR PRODUCTION NO. 91:

Please produce all DOCUMENTS reflecting any compensation, gifts, payments, honoraria, or consulting fees given by LILLY to the following:

- Dr. Mohammed Bahadori (prescriber) Arthritis Care Center, P.C.
14904 Jefferson Davis Hwy, Suite 203
Woodbridge, VA 22192
(703) 492-6660

RESPONSE TO REQUEST FOR PRODUCTION NO. 91:

Lilly responds that there are no documents indicating that Lilly provided compensation to Dr. Bahadori.

REQUEST FOR PRODUCTION NO. 92:

Please produce any written agreements, contracts, liability releases, or other legal documents that have been drafted and/or executed between LILLY or any third-party representing LILLY and the following:

- Dr. Mohammed Bahadori (prescriber) Arthritis Care Center, P.C.
14904 Jefferson Davis Hwy, Suite 203
Woodbridge, VA 22192
(703) 492-6660

RESPONSE TO REQUEST FOR PRODUCTION NO. 92:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 93:

Please produce all DOCUMENTS, including but not limited to marketing materials, brochures, sales aids, “slim jims,” “skiffs,” clinical trials / medical journal articles, PowerPoint presentations, etc., that were given or shown by LILLY pharmaceutical representatives to the following:

- Dr. Mohammed Bahadori (prescriber) Arthritis Care Center, P.C.
14904 Jefferson Davis Hwy, Suite 203
Woodbridge, VA 22192
(703) 492-6660

RESPONSE TO REQUEST FOR PRODUCTION NO. 93:

Subject to and without waiving its Objections to Plaintiff’s First Set of Requests for Production, Lilly responds that the information in its sales database does not indicate which marketing materials or other documents were shown to particular medical professionals.

REQUEST FOR PRODUCTION NO. 94:

Please produce all DOCUMENTS reflecting participation in any LILLY-sponsored educational or sales program involving CYMBALTA by the following:

- Dr. Mohammed Bahadori (prescriber) Arthritis Care Center, P.C.
14904 Jefferson Davis Hwy, Suite 203
Woodbridge, VA 22192
(703) 492-6660

RESPONSE TO REQUEST FOR PRODUCTION NO. 94:

Lilly responds that there are no documents indicating that Dr. Bahadori attended any Lilly-sponsored program.

REQUEST FOR PRODUCTION NO. 95:

Please produce, for the request above, all materials, including but not limited to PowerPoint presentations, syllabus, medical journal articles, summaries, agendas, etc., provided to or shown as part of the LILLY-sponsored program.

RESPONSE TO REQUEST FOR PRODUCTION NO. 95:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to its response to Request No. 94.

REQUEST FOR PRODUCTION NO. 96:

Please produce all records in YOUR possession related to Plaintiff. Please note that this request is in no way limited to medical or psychiatric records, but includes any DOCUMENTS obtained from a third-party by LILLY about the Plaintiff.

RESPONSE TO REQUEST FOR PRODUCTION NO. 96:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly responds that it will produce records about Plaintiff maintained by Lilly prior to the initiation of this lawsuit that can be located through a reasonably diligent search, but, because Plaintiffs have rejected the sharing of costs relating to medical record collection, Lilly will not be providing records obtained through the litigation medical collection process.

REQUEST FOR PRODUCTION NO. 97:

Please produce all DOCUMENTS reflecting any correspondence created in collecting the records described in the above request.

RESPONSE TO REQUEST FOR PRODUCTION NO. 97:

Lilly refers Plaintiff to its objections to this Request.

VII. OTHER REQUESTS

REQUEST FOR PRODUCTION NO. 98:

Please produce all DOCUMENTS identified in YOUR answers to all of Plaintiff's Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 98:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 99:

Please produce all DOCUMENTS from which YOU obtained answers in responding to all of Plaintiff's Interrogatories.

RESPONSE TO REQUEST FOR PRODUCTION NO. 99:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 100:

Please produce the custodial file, including but not limited to employment agreements, termination agreements, performance reviews, self-reviews, W-2s, and bonus amounts, for each individual presented by LILLY as a person most knowledgeable under Federal Rule of Civil Procedure 30(b)(6).

RESPONSE TO REQUEST FOR PRODUCTION NO. 100:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 101:

Please produce all electronic mail ("email") for the individuals presented by LILLY as a person most knowledgeable under Federal Rule of Civil Procedure 30(b)(6), whether internal or

external and whether on LILLY's current computer operating system, on individual employees' laptop computers, or archive systems, which contain at least one of the following terms:

Cy!, dulo!, Ariclaim, Xeristar, Yentreve, Duzela, Dulane, Cymgen, Prozac, Fluox!, Paxil, Parox!, Zoloft, Sertra!, Celexa, Citalop!, Lexapro, Escitalop!, Effexor, venlafa!, Pristiq, desvenlafax!, milnacipr!, levomilnacipr!, SSRI!, SNRI!, or anti!,

and at least one of the following terms:

DEAE!, discon!, withd!, taper!, cold w/1turkey, addict!, habit!, paresth!, zap!, electric w/4 shock, dizz!, Rosenbaum, Schatzberg, Glenmullen, half-life, "missed dose," downregu!, "greater than or equal to," Perahia, enteric, or time-release.

RESPONSE TO REQUEST FOR PRODUCTION NO. 101:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 102:

Please produce all DOCUMENTS in LILLY's possession, custody or control concerning any governmental investigations of LILLY in relation to CYMBALTA and, in any way, with WITHDRAWAL.

RESPONSE TO REQUEST FOR PRODUCTION NO. 102:

Lilly is not aware of any governmental investigations of Lilly in relation to Cymbalta and discontinuation symptoms.

REQUEST FOR PRODUCTION NO. 103:

With respect to Lilly's Patient Assistance and/or Lilly Cares Program for CYMBALTA, please produce all documents regarding Lilly's decision to establish the program; its structure

and budget; its criteria for deciding which patients qualify for the program; and any complaints, questions, or comments received from participants, physicians, or pharmacies.

RESPONSE TO REQUEST FOR PRODUCTION NO. 103:

Lilly refers Plaintiff to its objections to this Request.

REQUEST FOR PRODUCTION NO. 104:

Please produce all DOCUMENTS pertaining to Lilly's provision of CYMBALTA to Plaintiff, if applicable, as part of Lilly's Patient Assistance and/or Lilly Cares program.

RESPONSE TO REQUEST FOR PRODUCTION NO. 104:

Lilly responds that it has no records indicating that Plaintiff participated in LillyCares, and that Patient Assistance is not available for Cymbalta.

REQUEST FOR PRODUCTION NO. 105:

Please produce all Corporate Integrity Agreements LILLY has entered into with any government for any reason.

RESPONSE TO REQUEST FOR PRODUCTION NO. 105:

Subject to and without waiving its Objections to Plaintiff's First Set of Requests for Production, Lilly refers Plaintiff to Lilly's corporate integrity agreement, which publicly available at <http://www.lilly.com/Documents/CIA.pdf>

Respectfully Submitted,

Dated: March 9, 2015

By: _____/s/
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