

**FILED**

**AUG 08 2008**

**Judge Jamie D. Happas**

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*Attorneys for Defendants AstraZeneca Pharmaceuticals LP,  
AstraZeneca LP*

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IN RE : SUPERIOR COURT OF NEW JERSEY  
RISPERDAL/SEROQUEL/ZYPREXA : LAW DIVISION; MIDDLESEX COUNTY  
LITIGATION : Case No. 274  
: CIVIL ACTION  
: STIPULATED AMENDMENT TO  
: PROTECTIVE ORDER

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WHEREAS, on August 6, 2007, a Stipulated Protective Order of Confidentiality was entered for these matters ("Protective Order"); and

WHEREAS, the parties have reported to the Court that there have been times during the course of depositions of physicians who treated a plaintiff when that physician refused to execute an undertaking as required by paragraph 9 of the Protective Order before being shown or questioned about confidential information as defined in the Protective Order, and

WHEREAS, the plaintiffs and defendants AstraZeneca Pharmaceuticals LP and AstraZeneca LP ("AstraZeneca") and Janssen Pharmaceutica Inc. ("Janssen") have conferred and have agreed to the amendment of certain provisions set forth in the Protective Order to permit plaintiffs to show information designated as confidential by AstraZeneca and/or Janssen to such a physician-witness who refuses to execute an

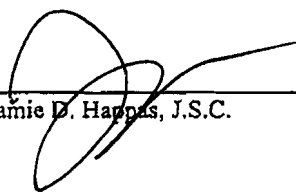
undertaking as required by paragraph 9 of the Protective Order or question that physician-witness about confidential information while maintaining all of the other provisions of the Protective Order; and

WHEREAS, all terms in the Protective Order not specifically modified herein shall remain in effect;

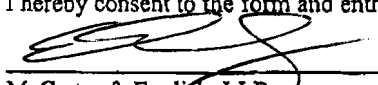
IT IS HEREBY ORDERED THIS 9 DAY OF <sup>Aug</sup>~~JULY~~, 2008, that the Protective Order is hereby amended to include a new paragraph "9A" to provide as follows:

9A. Any physician who treated a plaintiff ("physician-witness"), non-party fact witness or any other third party for whom there is a litigation need to disclose confidential information can be shown information designated as confidential by AstraZeneca and/or Janssen prior to and during his or her deposition if he or she complies with the terms of paragraph 9. If a physician-witness declines to comply with the terms of paragraph 9, either by executing the undertaking required by paragraph 9 of the Protective Order, or by orally agreeing to the undertaking set forth in paragraph 9, and to comply with the terms of the Protective Order after being asked to do so on the record while under oath at the deposition, the physician-witness may nevertheless be shown or questioned about such confidential information at the deposition, provided that no copies of the confidential information shall be left in the possession of that physician-witness and/or of his or her counsel and that copies of that confidential information shall not be attached to or included with any original or copy of the transcript of that deposition when it is provided to that physician-witness for review, signature or any other purpose. Notwithstanding the provisions of this paragraph, all parties are directed to make

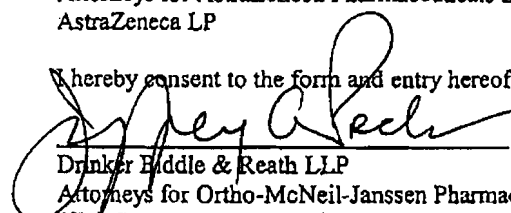
reasonable and good faith efforts to obtain agreement by all physician-witnesses to comply with paragraph 9 before invoking the procedures set forth in this paragraph, and in the event that any witness is shown or questioned about confidential material pursuant to the terms of this paragraph, that confidential material shall remain confidential pursuant to this Protective Order.

  
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Hon. Jamie D. Haggas, J.S.C.

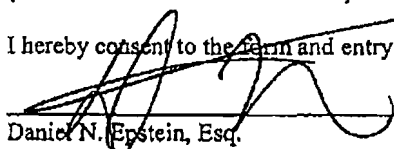
I hereby consent to the form and entry hereof:

  
\_\_\_\_\_  
7/31/08  
McCarter & English, LLP  
Attorneys for AstraZeneca Pharmaceuticals LP,  
AstraZeneca LP

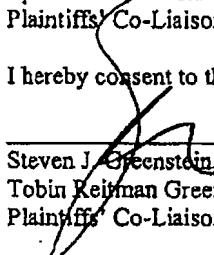
I hereby consent to the form and entry hereof:

  
\_\_\_\_\_  
7/30/08  
Drinker Biddle & Reath LLP  
Attorneys for Ortho-McNeil-Janssen Pharmaceuticals, Inc.  
(f/k/a Janssen Pharmaceutica Inc.) and related defendants

I hereby consent to the form and entry hereof:

  
\_\_\_\_\_  
7/24/08  
Daniel N. Epstein, Esq.  
Epstein Aron & Kahn  
Plaintiffs' Co-Liaison Counsel

I hereby consent to the form and entry hereof:

  
\_\_\_\_\_  
Steven J. Greenstein, Esq.  
Tobin Keifman Greenstein Caruso Wiener & Konray, P.C.  
Plaintiffs' Co-Liaison Counsel