



1 A And Symbyax.  
 2 Q Okay. Let's first talk about the first item in the  
 3 notice of deposition, which is regarding Lilly's  
 4 responses to a letter from FDA in March of 2007,  
 5 which was the subject of Plaintiff's Second Set of  
 6 Interrogatories and Document Requests to Defendants  
 7 in the Alaskan litigation. And I'm going to hand  
 8 you -- I'll hand you what we'll have marked as  
 9 Plaintiff's Exhibit 2.  
 10 (Plaintiff's Exhibit 2 was marked for  
 11 identification.)  
 12 Q And this appears to be a copy of a fax of a letter.  
 13 It bears several dates on the front page, the  
 14 earliest in time of which was March 28, 2007, and I  
 15 noticed that on the very last page there is an  
 16 electronic signature of Thomas Laughren at FDA  
 17 that's dated March 28, 2007. Do you see that?  
 18 A Yes, I do.  
 19 Q Was this letter faxed to you on March 28, 2007?  
 20 A Yes, it was.  
 21 Q Okay. And once you received this letter, who did  
 22 you distribute copies to?  
 23 A I distributed to individuals within the regulatory  
 24 affairs department in addition to those key  
 25 individuals on the team who are responsible for

1 this supplemental application.  
 2 Q And who were those key members responsible for the  
 3 supplemental application?  
 4 A They would be the medical director of the Zyprexa  
 5 team.  
 6 Q Who was?  
 7 A Sara Corya.  
 8 Q Okay. How does she spell her last name?  
 9 A C-O-R-Y-A.  
 10 Q Okay.  
 11 A The Zyprexa global brand development team leader at  
 12 the time was Eric Baclet.  
 13 Q Anyone else?  
 14 A Of course, my supervisor, Greg Brophy.  
 15 Q Okay.  
 16 A And, again, those -- there was a core team of  
 17 probably over 20 individuals, too, who are involved  
 18 in just the overall data package who were also  
 19 communicated, but those were the key individuals.  
 20 Q Now, the letter from FDA makes reference to a  
 21 number of regulatory filings with FDA by Lilly  
 22 regarding Symbyax; correct?  
 23 A Correct.  
 24 Q And Symbyax is a combination drug containing both  
 25 Zyprexa and Prozac; correct?

1 A That's correct.  
 2 Q Or, I guess, the generic terms would be containing  
 3 both olanzapine and fluoxetine; correct?  
 4 A That's correct.  
 5 Q Did I pronounce that last one correctly?  
 6 A Yes, you did.  
 7 Q Okay. And in those regulatory submissions, Lilly  
 8 was seeking approval from FDA to market the  
 9 combination drug Symbyax for use in treatment  
 10 resistant depression or TRD; is that correct?  
 11 A That's correct.  
 12 Q Okay. And it indicates that these prior  
 13 submissions had occurred in September of 2006, in  
 14 November of 2006, December of 2006, and February of  
 15 2007; correct?  
 16 A That's correct.  
 17 Q Okay. And am I correct that those submissions made  
 18 by Lilly to FDA included information from clinical  
 19 studies of the combination drug?  
 20 A That's correct.  
 21 Q Okay. And among other things, that clinical data  
 22 included information regarding changes in the blood  
 23 glucose of patients who were exposed to the  
 24 combination drug as compared to people who were  
 25 just receiving placebo; is that correct?

1 A That's correct.  
 2 Q And since those submissions occurred in the fall of  
 3 2006, the studies that contained that data would  
 4 have been concluded sometime before that; correct?  
 5 A That's correct.  
 6 Q And do you know when it was that those clinical  
 7 studies were done which contained the data that was  
 8 submitted to FDA in the submissions that are  
 9 referenced here?  
 10 A They had completed over numerous years, but the  
 11 last study that completed, which was to support the  
 12 indication which was HDAO, completed in the fall of  
 13 2005.  
 14 Q Fall of 2005. And that was the latest of those  
 15 studies; correct?  
 16 A That's correct.  
 17 Q And what was -- what would have been the earliest  
 18 of those studies?  
 19 A I don't recall. They were -- some of the  
 20 studies that we included in the submission were  
 21 also submitted with the original application for  
 22 Symbyax in 2002.  
 23 Q Okay. I want to make sure I understand. So that  
 24 the submissions that occurred in the fall of 2006  
 25 to support the additional indication for

