

PsychRights®
Law Project for
Psychiatric Rights, Inc.

December 21, 2006

Special Master Peter H. Woodin
JAMS
280 Park Avenue, 28th Floor
New York, New York 10017

Re: Zyprexa Products Liability Litigation, MDL 1596 ("Federal Litigation")
Certification of James Gottstein

I, the undersigned, James B. Gottstein, make the following representations concerning compliance with the order signed by Hon. Brian Cogan on December 19, 2006, ("Order") in the above-referenced federal litigation, directing the return of documents provided to me by Dr. David Egilman pursuant to subpoena ("Egilman Documents") issued by the Superior Court for the State of Alaska, Third Judicial District, in *In the Matter of the Guardianship of B.B.*, Case No. 3AN-04-545 P/G. and specified other relief, as that Order has been amended in the course of the Status Hearing conducted before Judge Cogan on December 20, 2006 ("Status Hearing").

For the record, I wish to note my continuing objection to the court's assertion of authority over me and the propriety of the issuance of this Order, including but not limited to objections relating to the court's jurisdiction to issue the Order, to the denial of due process with respect to proceedings culminating in the Order, and in particular to certain "findings" made in the Order. Dr. Egilman provided the documents at issue pursuant to my subpoena in the above-referenced state court litigation, only after following my instruction to give immediate notice of my subpoena to him to Eli Lilly and Company ("Lilly") as a party that had produced a portion of the subpoenaed documents in the Federal Litigation, and affording Lilly a reasonable opportunity to direct him to object to production. It was and remains my belief that I was doing nothing wrong when I received and made use of the documents thereafter produced to me by Dr. Egilman. I understand the parties to the Federal Litigation may see this differently, though I would note that to my knowledge, neither Judge Cogan, Judge Weinstein, nor any other court has ever ruled that disclosure of the Egilman Documents is not in the public interest. That may be a matter for another day. My purpose here is simply to note, as my counsel did in the Status Hearing, the continuing nature and reservation of this objection, and the fact that in voluntarily undertaking the steps outlined in the Order, I am not thereby submitting to the jurisdiction of the court or waiving my objections.

All representations herein are made in good faith, in an effort to fully cooperate with the court and parties to the Federal Litigation, and are based on what I know or recall at this time, having made diligent and extensive efforts considering the time allotted to ensure the accuracy hereof. To my knowledge, I have made all disclosures and undertaken all activities encompassed by the Order. Should I subsequently discover or recall any information which, had I been aware of it at this time, should have been provided pursuant to the Order, I will promptly supplement this document by communicating it to the Special Discovery Master.

The Order specifies the return of documents produced by Lilly pursuant to CMO-3 and which were provided to me by Dr. David Egilman "or any other source." I have no independent knowledge of the source of the documents sent to me by Dr. Egilman, but am assuming for

present purposes that all of the Egilman Documents were provided to him pursuant to CMO-3. To my knowledge, I have not obtained documents provided pursuant to CMO-3 from any other source, subject to the caveat set forth in section 6 below.

1. I certify that after issuance of Judge Cogan's Order I did not further disseminate the Egilman Documents (and in fact had voluntarily refrained from further distribution of Egilman Documents after receiving a letter from Lilly's counsel requesting this in the preceding week).
2. All documents provided by Dr. Egilman to me pursuant to my subpoena were received electronically. I do not have, and have not had, paper copies of any of the Egilman Documents. On December 20, 2006, after receiving clarification that the court and counsel for Lilly were dropping the requirement that I create a "Bates stamp" index of documents so that I no longer needed to preserve copies for that purpose, I deleted all Egilman Documents from my computer. Before doing so, I made a copy of these documents on a DVD, labeled "All Z Docs 12/20/06." I have delivered this DVD today to my counsel, D. John McKay, for forwarding to you. Except as specified in items 5 and 6 below, I no longer have in my possession or control any copies of the Egilman Documents.
3. In addition to the aforementioned copies of the Egilman Documents sent electronically to and residing in my computer, I made a number of copies of these documents on DVDs, burned from my computer and distributed these copies. As noted further in section 7 below, I have retrieved or made a good faith effort to retrieve all of these copies. Those DVDs that I have been able to retrieve myself, or that were still in my possession, were turned over to local counsel for Eli Lilly yesterday for forwarding to the Special Master, per agreement. I have asked all others to whom I distributed the DVDs to turn over what I gave them to the Special Master and ensure that no copies exist. In addition, I happen to have copied one of the Egilman Documents onto a "flash drive." I have deleted it, and before doing so, I burned a copy of it onto a DVD that was among those delivered yesterday to counsel for Lilly, on a DVD labeled "from flash drive."
4. I have located the .pdf file Mr. McKay referred to in the December 20 status hearing, a word-searchable compilation of the Egilman Documents and the dozen or so files that were added together to make that file that I had created. As Mr. McKay promised, I have deleted that document from my computer.
5. While the Order does not specifically mention or address back-up copies, in an effort to fully cooperate in good faith with the intent of the order, I have taken steps to secure the removal of any copies of the Egilman Documents that might exist in any medium, in any location, where my computer is routinely backed up. I do not have the necessary access or technical expertise to accomplish this, but I have given directions to the individual who does have it to accomplish this as soon as practicable, and to ensure the security of the backup media in the meanwhile. Earlier this week I provided you with a copy of communication with this technician to this effect, and when the task is completed, my counsel will secure a certification to this effect and forward it to you.
6. In the course of my longstanding representation of clients and other advocacy work with respect to a variety of mental health-related issues, including but not limited to my work for the Law Project for Psychiatric Rights (PsychRights) and my successful prosecution of litigation culminating in the Alaska Supreme Court's ruling in *Myers v. Alaska Psychiatric Institute*, 138 P.3d 238 (Alaska 2006) restricting forced drugging, I have had occasion to acquire and publicly disseminate many, many documents relating to mental health treatment and related issues. These

documents, and the litigation and other activities to which they relate, have often specifically concerned the use of drugs, including but not limited to Eli Lilly's drug Zyprexa, which is the subject of your above-referenced MDL products liability litigation. I have routinely made such documents available publicly to anyone interested in the rights of people diagnosed with serious mental illness, and will continue to do so, on my website and otherwise. I know that such documents collected and utilized in the past include a substantial number of documents specifically concerning Zyprexa, including but not limited to numerous Zyprexa-related documents that have previously been produced pursuant to the Federal Freedom of Information Act. Because of the voluminous nature of these documents previously in my possession, and the fact that due to the Order I am unable to ascertain the identity of all the items contained in the Egilman Documents that were temporarily in my possession, I wish to note that it is possible that contained within the Egilman Documents are items that I and others have previously, and entirely appropriately, possessed and used. I simply do not know, and compliance with the court's order makes it impossible for me to determine this now. I suspect that it is not unlikely, however, since it is my understanding that some of the files encompassed by the court's protective order include a number of documents such as newspaper articles and other items that are already public and may well be in my independently and previously existing collection of documents. Therefore, while I can certify in complete good faith that I have deleted and/or returned all of the Egilman Documents, I cannot warrant that I have no copies of any documents that might coincidentally be found among the hundreds and hundreds of files comprising the Egilman Documents.

7. The lists in the subsections below identify, to the best of my ability, the persons, organizations or entities who obtained copies of Egilman Documents through me. I am informed that in the course of the Status Hearing, the court amended its Order to eliminate the requirement that I create an index identifying by Bates stamp number which documents were disseminated to whom. All those who received copies of the Egilman Documents from me or through me received all or a portion of one of two datasets. On Tuesday, December 12, 2006, Dr. Egilman first sent me documents I had requested in my subpoena to him. When I received these, comprising 356 documents, I burned copies of them onto one or more identical DVDs labeled "356 ZDocs" or "Zdocs 356" (hereinafter referred to as "DVD 1") On the following day, Dr. Egilman electronically sent me additional documents pursuant to the subpoena, and when I received these I burned new identical DVDs, labeled "ZDocs 12/13/06," or "12/13/06 ZDocs" (hereinafter referred to as "DVD 2") which new DVD 2 contained both the documents that arrived that day, and the documents that arrived the day before. (A .pdf file showing a photocopy of each of the aforementioned DVDs delivered to local counsel for Lilly yesterday, for forwarding to the Special Master is attached hereto as Exhibit 1.) All those who received DVD copies of Egilman Documents from me received one of these two datasets, either by getting one of the DVDs, or accessing the document electronically from my computer. I cannot recall with absolute certainty who got which of the two datasets.

Those to whom copies were provided received these copies either in person, on DVDs, or via U.S. Mail, on DVD, or by accessing an Internet FTP server(s), as FTP files. Before the Order was signed, I began the process of contacting those to whom I had provided copies to secure their return. As to those I contacted by e-mail for this purpose, I copied the Special Discovery Master and counsel. Those to whom I gave copies to in person, I personally met with to retrieve their copies.

a) Those to whom I provided copies in person, and from whom I was subsequently able to personally retrieve these copies, all in DVD format, are as follows:

<u>Recipient</u>	<u>Format</u>
• Terrie Gottstein	DVD 1
• Jerry Winchester	DVD labeled "from J. Winchester," provided to Lilly counsel

To the best of my memory, I distributed no other copies in person.

b) Those who did not receive copies from me in person include the following. The notation indicating whether they received DVD 1 or DVD 2 or both, and/or whether they accessed the documents from an Internet FTP Server, reflects the best of my knowledge at this time:

Recipient	Affiliation or Other Identification	Format
Alex Berenson	New York Times	DVD 1, DVD 2, FTP Access.
Dr. Peter Breggin	Prominent psychiatrist of conscience, expert witness, and prolific author	DVD 1, possibly DVD 2.
Dr. Grace Jackson	Perhaps the most knowledgeable psychiatrist expert on psychopharmacology in the US, if not world, with respect to mechanisms of action in the brain and body	Both DVDs
Dr. David Cohen	Florida International University	Both DVDs, I believe
Bruce Whittington	PsychRights Executive Director	DVD 1
Dr. Stephen Kruszewski	Psychiatrist	Only DVD 2, I believe, maybe both
Laura Ziegler	Psychiatric Survivor/Activist	DVD 1 only, I believe
Judi Chamberlin	Psychiatric Survivor/Activist Icon, author of "On Our Own."	DVD 1 only, I believe
Vera Sherav	Alliance for Human Rights Protection	DVD 2, two copies
Robert Whitaker	Former medical/science journalist, and author of <i>Mad In America: Bad Science, Bad Medicine and the Enduring Mistreatment of the Mentally Ill</i>	Both DVDs, I think.
Steve Cha	House Committee on Government Reform (Minority Office)	DVD 2
Will Hall	Psychiatric Survivor/Activist, co-founder of the Freedom Center in Northampton, MA	Either or both DVDs and I believe FTP
Singeha Prakash	National Public Radio	DVD 2

c) Also, a .pdf file containing the FTP logs from my computer relating to the Egilman Documents is attached hereto as Exhibit 2, insofar as it may in some cases constitutes the best evidence, or supplemental evidence, of to whom Egilman Documents were provided, and/or of which documents were provided to whom.

Finally, I certify that I have taken steps to preserve, until further order of the court, all documents, voice mails, emails, materials and information, including but not limited to all

communications that refer to, relate to or concern Dr. Egilman or any other efforts to obtain documents produced by Eli Lilly and Company in the Federal Litigation, reserving all rights and without waiving any objections that might be made to actually producing such documents based on any privilege or other provision of law, and subject to the caveat set forth in section 6.

James B. Gottstein

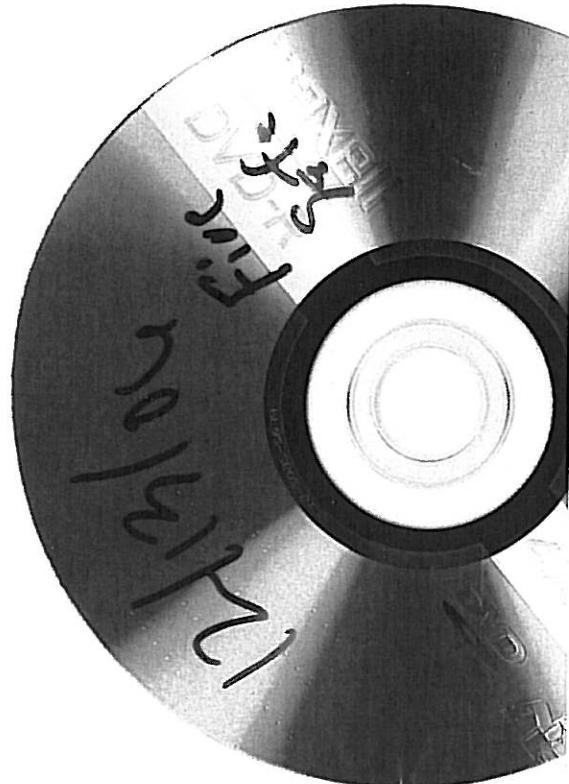
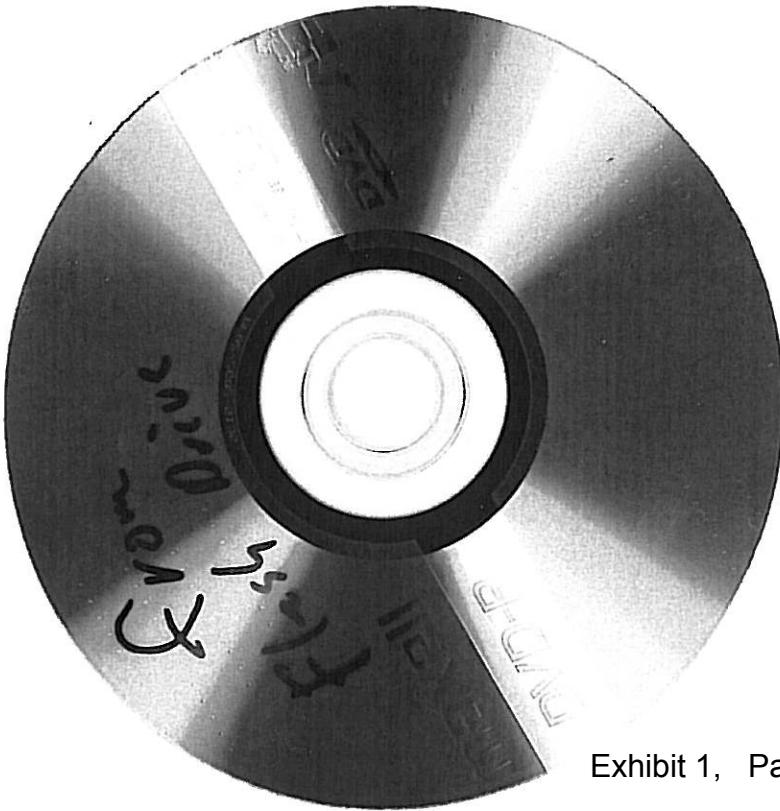
To Brewster Jennings

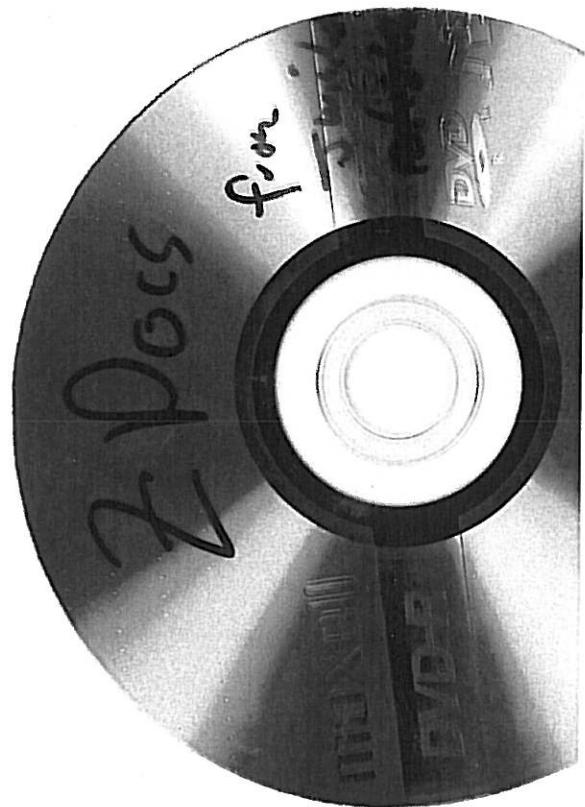
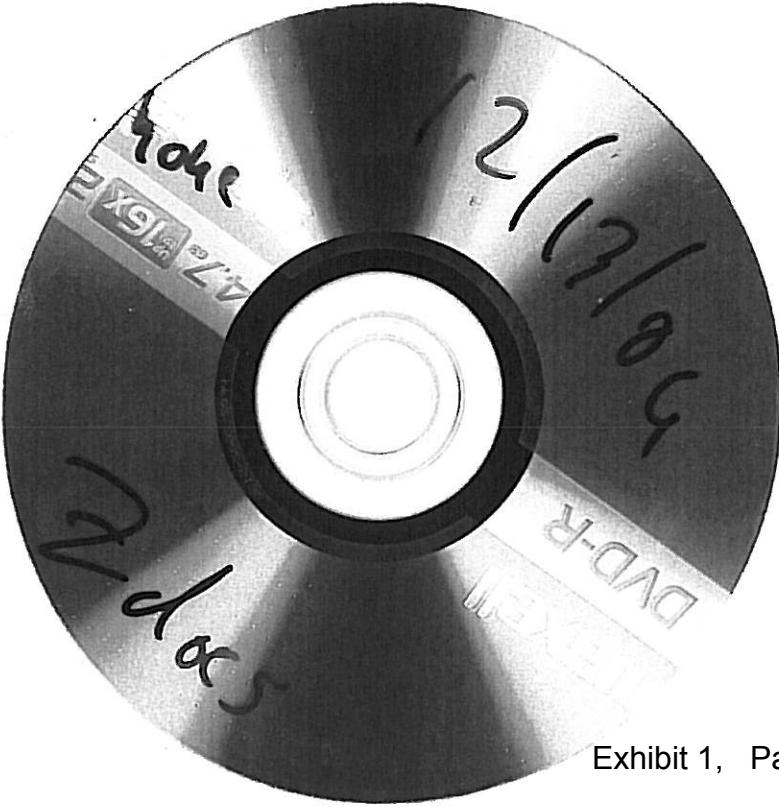
12/20/06

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≈ 12:05

Home





ex061215.log

```
#Software: Microsoft Internet Information Services 5.0
#Version: 1.0
#Date: 2006-12-15 00:18:06
#Fields: time c-ip cs-username s-si tename s-computername s-ip s-port cs-method
cs-uri -stem sc-status cs-host cs(User-Agent) cs(Cookie) cs(Referer)
00:18:06 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [489]USER
schi zophrenia 331 - - -
00:18:06 172.16.2.245 - MSFTPSVC2 PENTA1 172.16.1.129 21 [489]PASS - 530 - - -
00:21:39 172.16.2.245 Zyprexa MSFTPSVC2 PENTA1 172.16.1.129 21 [490]USER Zyprexa 331
- - -
00:21:39 172.16.2.245 - MSFTPSVC2 PENTA1 172.16.1.129 21 [490]PASS - 530 - - -
00:21:55 172.16.2.245 Zyprexa MSFTPSVC2 PENTA1 172.16.1.129 21 [490]USER Zyprexa 331
- - -
00:21:55 172.16.2.245 - MSFTPSVC2 PENTA1 172.16.1.129 21 [490]PASS - 530 - - -
00:22:19 172.16.2.245 Ei i Lii ly MSFTPSVC2 PENTA1 172.16.1.129 21 [490]USER Ei i Lii ly
331 - - -
00:22:19 172.16.2.245 - MSFTPSVC2 PENTA1 172.16.1.129 21 [490]PASS - 530 - - -
00:22:29 172.16.2.245 Ei i Lii ly MSFTPSVC2 PENTA1 172.16.1.129 21 [490]USER Ei i Lii ly
331 - - -
00:22:29 172.16.2.245 - MSFTPSVC2 PENTA1 172.16.1.129 21 [490]PASS - 530 - - -
00:58:08 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [491]USER
schi zophrenia 331 - - -
00:58:08 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [491]PASS - 230
- - -
00:58:31 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [491]sent
/356/ZY1+++00008867.TIF 226 - - -
00:59:03 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [491]created
CONNECT.wav 550 - - -
00:59:03 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [491]created
CONNECT.wav 550 - - -
00:59:10 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [491]QUIT - 226
- - -
02:07:41 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [492]USER
schi zophrenia 331 - - -
02:07:41 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [492]PASS - 230
- - -
02:07:50 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [492]QUIT - 350
- - -
02:08:25 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [493]USER
schi zophrenia 331 - - -
02:08:25 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [493]PASS - 230
- - -
02:08:30 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [493]created
COMPLETE.wav 550 - - -
02:08:30 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [493]created
COMPLETE.wav 550 - - -
02:08:47 172.16.2.245 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [493]QUIT - 226
- - -
```

ex061214a.log

#Software: Microsoft Internet Information Services 6.0
#Version: 1.0
#Date: 2006-12-14 17:15:58
#Fields: time c-ip cs-method cs-uri-stem sc-status sc-win32-status
17:15:58 172.16.2.245 [1719]USER schizophrenia 331 0
17:15:58 172.16.2.245 [1719]PASS - 530 1326
17:16:12 172.16.2.245 [1719]USER schizophrenia 331 0
17:16:12 172.16.2.245 [1719]PASS - 230 0
17:18:59 172.16.2.245 [1719]closed - 421 121

ex061214.log

#Software: Microsoft Internet Information Services 5.0
#Version: 1.0
#Date: 2006-12-14 03:33:09
#Fields: time c-ip cs-username s-si tename s-computername s-ip s-port cs-method
cs-uri-stem sc-status cs-host cs(User-Agent) cs(Cookie) cs(Referer)
03:33:09 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [342]USER
schizoprenia 331 - - -
03:33:09 71.127.1.55 - MSFTPSVC2 PENTA1 172.16.1.129 21 [342]PASS - 530 - - -
03:33:57 71.127.1.55 anonymous MSFTPSVC2 PENTA1 172.16.1.129 21 [343]USER anonymous
331 - - -
03:33:57 71.127.1.55 - MSFTPSVC2 PENTA1 172.16.1.129 21 [343]PASS
mozilla@example.com 530 - - -
03:34:13 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]USER
schizoprenia 331 - - -
03:34:13 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]PASS - 230
- - -
03:34:14 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 550
- - -
03:34:14 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 426
- - -
03:34:14 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 550
- - -
03:34:14 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 426
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- - -
03:34:36 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 356
550 - - -
03:34:36 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 356
426 - - -
03:34:36 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 356
550 - - -
03:34:36 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 356
426 - - -
03:34:36 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 356
550 - - -
03:34:36 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 356
426 - - -
03:34:43 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Complaint 550 - - -
03:34:43 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Complaint 426 - - -
03:34:43 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Complaint 550 - - -
03:34:43 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Complaint 426 - - -
03:34:43 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Complaint 550 - - -
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/Zyprexa+Amended+Complaint 426 - - -
03:34:51 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Complaint/Documents+Captioned+Zyprexa+Amended+Complaint 550 - - -
03:34:51 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Complaint/Documents+Captioned+Zyprexa+Amended+Complaint 426 - - -
03:34:51 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Complaint/Documents+Captioned+Zyprexa+Amended+Complaint 550 - - -
03:34:51 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Complaint/Documents+Captioned+Zyprexa+Amended+Complaint 426 - - -
03:34:51 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Complaint/Documents+Captioned+Zyprexa+Amended+Complaint 550 - - -
03:34:51 71.127.1.55 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent

ex061214. log

ex061214.log

03:35:32 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent /356
426 - - -
03:35:32 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent /356
550 - - -
03:35:32 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent /356
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03:35:32 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent /356
550 - - -
03:35:32 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent /356
426 - - -
03:35:43 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 550
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03:35:43 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 426
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03:35:43 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 426
- - -
03:35:47 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
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03:35:47 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Compl ai nt 426 - - -
03:35:47 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Compl ai nt 550 - - -
03:35:47 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Compl ai nt 426 - - -
03:35:47 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Compl ai nt 550 - - -
03:35:47 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent
/Zyprexa+Amended+Compl ai nt 426 - - -
03:36:34 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 550
- - -
03:36:34 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 426
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- - -
03:36:34 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 550
- - -
03:36:34 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [343]sent / 426
- - -
03:38:24 71.127.1.55 - MSFTPSVC2 PENTA1 172.16.1.129 21 [342]cl osed - 421 - - -
03:51:49 71.127.1.55 anonymous MSFTPSVC2 PENTA1 172.16.1.129 21 [344]USER anonymous
331 - - -
03:51:49 71.127.1.55 - MSFTPSVC2 PENTA1 172.16.1.129 21 [344]PASS -wget@ 530 - - -
03:52:10 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [345]USER
schizophrenia 331 - - -
03:52:10 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [345]PASS - 230
- - -
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schizophrenia 331 - - -
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- - -
03:53:03 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [347]USER
schizophrenia 331 - - -
03:53:03 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [347]PASS - 230
- - -
03:53:21 71.127.1.55 schizophrenia MSFTPSVC2 PENTA1 172.16.1.129 21 [348]USER

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schi zophreni a 331 - - - -
03: 53: 21 71. 127. 1. 55 schi zophreni a MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [348]PASS - 230
- - - -
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12: 59: 41 71. 127. 1. 55 schi zophreni a MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [483]sent / 550
- - -
12: 59: 41 71. 127. 1. 55 schi zophreni a MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [483]sent / 426
- - -
12: 59: 41 71. 127. 1. 55 schi zophreni a MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [483]sent / 550
- - -
12: 59: 41 71. 127. 1. 55 schi zophreni a MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [483]sent / 426
- - -
12: 59: 41 71. 127. 1. 55 schi zophreni a MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [483]sent / 550
- - -

ex061214.log

12: 59: 41 71. 127. 1. 55 schizophre ni a MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [483]sent / 426
- - -
12: 59: 46 71. 127. 1. 55 schizophre ni a MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [483]sent
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/Zyprexa+Amended+Compl ai nt 426 - - -
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/Zyprexa+Amended+Compl ai nt 550 - - -
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/Zyprexa+Amended+Compl ai nt 426 - - -
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/Zyprexa+Amended+Compl ai nt 550 - - -
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/Zyprexa+Amended+Compl ai nt 426 - - -
21: 04: 04 172. 16. 2. 245 schizophre ni a MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [484]USER
schi zophreni a 331 - - -
21: 04: 15 172. 16. 2. 245 - MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [484]PASS - 530 - - -
21: 05: 38 172. 16. 2. 245 schizophre ni a MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [485]USER
schi zophreni a 331 - - -
21: 05: 47 172. 16. 2. 245 - MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [485]PASS - 530 - - -
21: 06: 23 172. 16. 2. 245 schizophre ni a MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [486]USER
schi zophreni a 331 - - -
21: 06: 32 172. 16. 2. 245 - MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [486]PASS - 530 - - -
21: 07: 21 172. 16. 2. 245 schizophre ni a MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [487]USER
schi zophreni a 331 - - -
21: 08: 00 172. 16. 2. 245 El i Li l l y MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [488]USER El i Li l l y
331 - - -
21: 08: 00 172. 16. 2. 245 - MSFTPSVC2 PENTA1 172. 16. 1. 129 21 [488]PASS - 530 - - -

ex061213a.log

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#Version: 1.0
#Date: 2006-12-13 01:23:36
#Fields: time c-ip cs-method cs-uri-stem sc-status sc-win32-status
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01:23:36 207.31.197.88 [1686]PASS - 230 0
01:26:26 207.31.197.88 [1687]USER schizophrenia 331 0
01:26:26 207.31.197.88 [1687]PASS - 230 0
01:26:33 207.31.197.88 [1687]created /ZY1+++00363522.TIF 226 0
01:26:33 207.31.197.88 [1688]USER schizophrenia 331 0
01:26:33 207.31.197.88 [1688]PASS - 230 0
01:26:34 207.31.197.88 [1689]USER schizophrenia 331 0
01:26:34 207.31.197.88 [1689]PASS - 230 0
01:26:43 207.31.197.88 [1689]created /ZY1+++00373301.TIF 226 0
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ex061213a. log

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18: 55: 47 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Compl ai nt/Documents+Ci ted+i n+Zyprexa+Amended+Compl ai nt/Sw+++Image--
ZY9209152. tif 226 0

ex061213a.1og

18: 55: 51 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Complaint/Documents/Created+in+Zyprexa+Amended+Complaint/Sw+++Image+-+
ZY9296467. tif 226 0
18: 56: 14 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Complaint/Documents/Created+in+Zyprexa+Amended+Complaint/Sw+++Image+-+
ZY93712429. tif 226 0
18: 56: 29 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Complaint/Documents/Created+in+Zyprexa+Amended+Complaint/Sw+++Image+-+
ZY9373836. tif 226 0
18: 56: 33 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Complaint/Documents/Created+in+Zyprexa+Amended+Complaint/Sw+++Image+-+
ZY9423375. tif 226 0
18: 56: 52 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Complaint/Documents/Created+in+Zyprexa+Amended+Complaint/Sw+++Image+-+
ZY9453519. tif 226 0
18: 56: 55 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Complaint/Documents/Created+in+Zyprexa+Amended+Complaint/Sw+++Image+-+
ZY95201325. tif 226 0
18: 56: 59 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Complaint/Documents/Created+in+Zyprexa+Amended+Complaint/Sw+++Image+-+
ZY994158. tif 226 0
18: 57: 08 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Complaint/Documents/Created+in+Zyprexa+Amended+Complaint/Sw+++Image+-+
ZY994178. tif 226 0
18: 57: 12 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Complaint/Documents/Created+in+Zyprexa+Amended+Complaint/Sw+++Image+-+
ZY994210. tif 226 0
18: 57: 16 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Complaint/Documents/Created+in+Zyprexa+Amended+Complaint/Sw+++Image+-+
ZY994401. tif 226 0
18: 57: 33 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Complaint/Documents/Created+in+Zyprexa+Amended+Complaint/Sw+++Image+-+
ZY99451648. tif 226 0
18: 57: 37 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Complaint/Documents/Created+in+Zyprexa+Amended+Complaint/Sw+++Image+-+
ZY994613. tif 226 0
18: 57: 41 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Complaint/Documents/Created+in+Zyprexa+Amended+Complaint/Sw+++Image+-+
ZY994701. tif 226 0
18: 57: 52 207. 31. 197. 88 [1715]created
/Zyprexa+Amended+Complaint/Documents/Created+in+Zyprexa+Amended+Complaint/Sw+++Image+-+
ZYPA78414. tif 226 0
19: 25: 18 172. 16. 2. 245 [1717]USER schizophrenia 331 0
19: 25: 18 172. 16. 2. 245 [1717]PASS - 530 1326
19: 25: 38 172. 16. 2. 245 [1717]USER schizophrenia 331 0
19: 25: 38 172. 16. 2. 245 [1717]PASS - 230 0
19: 26: 32 172. 16. 2. 245 [1717]CWD 356 250 0
19: 28: 48 172. 16. 2. 245 [1717]closed - 421 121
22: 40: 52 172. 16. 2. 245 [1718]USER schizophrenia 331 0
22: 40: 52 172. 16. 2. 245 [1718]PASS - 230 0
22: 40: 52 172. 16. 2. 245 [1718]CWD 356 250 0
22: 40: 55 172. 16. 2. 245 [1718]CWD .. 250 0
22: 40: 57 172. 16. 2. 245 [1718]CWD Zyprexa+Amended+Complaint 250 0
22: 40: 59 172. 16. 2. 245 [1718]CWD Documents/Created+in+Zyprexa+Amended+Complaint 250 0
22: 41: 17 172. 16. 2. 245 [1718]QUIT - 226 0

ex061213.log

```
#Software: Microsoft Internet Information Services 5.0
#Version: 1.0
#Date: 2006-12-13 23:19:16
#Fields: time c-ip cs-username s-si tename s-computername s-ip s-port cs-method
cs-uri-stem sc-status cs-host cs(User-Agent) cs(Cookie) cs(Referer)
23:19:16 172.16.2.245 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [341]USER
schi zophrenia 331 - - -
23:19:24 172.16.2.245 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [341]PASS - 230
- - -
23:25:00 172.16.2.245 schizoprenia MSFTPSVC2 PENTA1 172.16.1.129 21 [341]closed -
421 - - -
```

ex061212.log

#Software: Microsoft Internet Information Services 6.0
#Version: 1.0
#Date: 2006-12-12 01:02:07
#Fields: time c-ip cs-method cs-uri-stem sc-status sc-win32-status
01:02:07 172.16.2.245 [1632]USER anonymous 331 0
01:02:07 172.16.2.245 [1632]PASS mozilla@example.com 530 1326
01:02:29 66.31.155.99 [1633]USER anonymous 331 0
01:02:29 66.31.155.99 [1633]PASS mozilla@example.com 530 1326
01:02:32 66.31.155.99 [1633]USER schizophrencia 331 0
01:02:32 66.31.155.99 [1633]PASS - 230 0
01:02:33 66.31.155.99 [1633]sent /docs 550 2
01:02:33 66.31.155.99 [1633]CWD /docs 550 2
01:02:42 172.16.2.245 [1632]USER schizophrencia 331 0
01:02:42 172.16.2.245 [1632]PASS - 530 1326
01:02:57 172.16.2.245 [1634]USER anonymous 331 0
01:02:57 172.16.2.245 [1634]PASS mozilla@example.com 530 1326
01:03:13 172.16.2.245 [1634]USER schizophrencia 331 0
01:03:13 172.16.2.245 [1634]PASS - 230 0
01:03:13 172.16.2.245 [1634]sent /docs 550 2
01:03:13 172.16.2.245 [1634]CWD /docs 550 2
01:03:31 66.31.155.99 [1635]USER anonymous 331 0
01:03:31 66.31.155.99 [1635]PASS moozilla@example.com 530 1326
01:03:35 66.31.155.99 [1635]USER schizophrencia 331 0
01:03:35 66.31.155.99 [1635]PASS - 230 0
01:03:36 66.31.155.99 [1635]sent /docs/xx.html 550 3
01:03:36 66.31.155.99 [1635]CWD /docs/xx.html 550 3
01:03:49 66.31.155.99 [1636]USER anonymous 331 0
01:03:49 66.31.155.99 [1636]PASS moozilla@example.com 530 1326
01:03:52 66.31.155.99 [1636]USER schizophrencia 331 0
01:03:52 66.31.155.99 [1636]PASS - 230 0
01:03:54 66.31.155.99 [1636]sent /docs/xx.doc 550 3
01:03:54 66.31.155.99 [1636]CWD /docs/xx.doc 550 3
14:52:52 207.31.197.88 [1660]USER anonymous 331 0
14:52:52 207.31.197.88 [1660]PASS IEUUser@ 530 1326
14:52:52 207.31.197.88 [1661]USER anonymous 331 0
14:52:52 207.31.197.88 [1661]PASS IEUUser@ 530 1326
16:30:00 207.31.197.88 [1662]USER schizophrencia 331 0
16:30:00 207.31.197.88 [1662]PASS - 230 0
16:30:23 207.31.197.88 [1662]created /sand.jpg 226 0
16:31:31 207.31.197.88 [1662]DELE sand.jpg 250 0
16:50:06 207.31.197.88 [1663]USER schizophrencia 331 0
16:50:06 207.31.197.88 [1663]PASS - 230 0
16:54:20 207.31.197.88 [1663]created /sand.jpg 226 0
16:55:09 207.31.197.88 [1663]DELE sand.jpg 250 0
21:50:32 90.19.8.216 [1679]USER anonymous 331 0
21:50:32 90.19.8.216 [1679]PASS Lgpuser@home.com 530 1326

ex061211.log

#Software: Microsoft Internet Information Services 6.0
#Version: 1.0
#Date: 2006-12-11 20:56:57
#Fields: time c-ip cs-method cs-uri-stem sc-status sc-win32-status
20:56:57 172.16.2.245 [1612]USER schizophrencia 331 0
20:57:15 172.16.2.245 [1612]PASS - 230 0
20:57:27 172.16.2.245 [1612]created /CONNECT.wav 226 0
20:57:40 172.16.2.245 [1612]DELETE CONNECT.wav 250 0
20:57:52 172.16.2.245 [1612]QUIT - 226 0
21:04:45 172.16.2.245 [1613]USER schizophrencia 331 0
21:04:55 172.16.2.245 [1613]PASS - 230 0
21:04:59 172.16.2.245 [1613]created /COMPLETE.wav 226 0
21:05:16 172.16.2.245 [1613]DELETE COMPLETE.wav 250 0
21:05:20 172.16.2.245 [1613]QUIT - 226 0