

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

IN RE: DIET DRUGS (PHENTERMINE/FENFLURAMINE/ : MDL NO. 1203  
DEXFENFLURAMINE) PRODUCTS LIABILITY LITIGATION :  
THIS DOCUMENT RELATES TO: ALL ACTIONS :

**NOTICE OF DEPOSITION OF GENERIC EXPERT WITNESS**

**TO:** Wyeth  
C/O Paul B. Kerrigan, Esquire  
REED SMITH LLP  
2500 One Liberty Place  
1650 Market Street  
Philadelphia, PA 19103-7301

PLEASE TAKE NOTICE THAT the Plaintiffs' Management Committee will take the deposition upon oral examination of HARRISON W. FARBER, M.D. who has been designated by Wyeth as a generic expert. The deposition will take place on August 25, 2006 beginning at 10:00 AM at the offices of Robinson & Cole, LLP, One Boston Place, Boston, MA 02108 (25<sup>th</sup> Floor). The deposition will be stenographically recorded and may be recorded by videotape as well.

At his deposition, the witness shall produce the following documents for inspection and copying:


1. All documents reflecting, relating or referring to any communications between Wyeth and/or its attorneys and Harrison W. Farber, M.D. ("Dr. Farber") at any time;
2. All documents provided by Wyeth and/or its attorneys to Dr. Farber at any time;

3. All documents consulted, relied upon, reviewed, and/or created by or on behalf of Dr. Farber in connection with the matters at issue in the above entitled litigation, opinions formed by Dr. Farber in connection with the above entitled litigation, and any testimony that Dr. Farber has or will provide in connection with the above entitled litigation;

4. All documents reflecting, relating or referring to any financial relationship between Dr. Farber and Wyeth, including documents reflecting relating or referring to the amounts that Wyeth has paid or will pay Dr. Farber in connection with his retention as an expert in the above entitled litigation.

As used herein the terms “documents” is used in the broadest possible sense under the Federal Rules of Civil Procedure to include all materials in graphic or tangible form, including, without limitation, drafts, e-mails, charts, pictures, graphs, articles, etc.

Respectfully Submitted,



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Laurence S. Berman, Esquire  
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*Plaintiffs' Co-Lead and Liaison Counsel in MDL  
1203*