

**LIST OF TOPICS FOR ELECTRONIC DOCUMENTS
FOR DISCOVERY FROM PLAINTIFFS' COMPUTERS
FOR PLAINTIFFS ALLEGING SYSTEMIC INJURIES**

In the context of these requests, "isotretinoin" means any and all forms of the prescription drug generically known as isotretinoin, including Claravis®, Sotret®, Amnesteem® and other branded or non-branded versions or forms of isotretinoin, including but not limited to Accutane®.

"Isotretinoin user" is defined to mean each Plaintiff that ingested isotretinoin and is alleging systemic injuries.

"Documents" is defined to include all documents and correspondence of any kind, including letters, notes, e-mails, instant messages, stories, poems, word processing files (including Word, WordPerfect, and Lotus Notes files), Excel files, PowerPoint files, and image files (including .tif, .pdf and .jpeg files). Defendants request these documents regardless of whether they are located on a hard drive, disk, CD-ROM, any other electronic storage format, or in a printout. URL or web addresses should be provided where available.

All requests shall be interpreted to exclude privileged communications between plaintiffs and their attorneys.

I. Identify each and every computer used by the Plaintiffs by providing:

- a. **the name of the individual that owns the computer**
- b. **the current location of the computer**
- c. **approximate dates or timeframe Plaintiff used the computer**
- d. **whether the computer was searched for the information requested below.**
- e. **If the computer was not searched for the information requested below, provide the reason that it was not searched.**

Owner	Location	Dates of Use	Whether Searched	Reasons Not Searched

II. Isotretinoin User's Electronic Documents and Correspondence

Request
1. All college applications and essays (including drafts) written for college applications by the isotretinoin user.

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| 2. A printout of the isotretinoin user's website "favorites" (websites frequently visited or book-marked), redacted for non-users favorites. |
| 3. All diaries, journals, calendars, kept by the isotretinoin user. |
| 4. All photographs in which the isotretinoin user appears, whether alone or with friends and/or family for the time period beginning one year prior to Plaintiff's(s') first or only prescription of isotretinoin and ending two years after diagnosis of Plaintiff's(s') alleged injuries. |

III. Other Documents and Correspondence in Plaintiffs' Possession, Custody, or Control

A. Isotretinoin and other Medications

Request
1. All documents referring to isotretinoin, excluding those post-dating retention of counsel.
2. All documents referring to ingestion of isotretinoin, prescriptions for isotretinoin, potential side effects of isotretinoin, research performed regarding isotretinoin, isotretinoin warnings or labeling information, or adverse events experienced by users of isotretinoin, excluding those post-dating retention of counsel.
3. All documents referring to treatment for acne or acne in general, excluding those post-dating retention of counsel.
4. All correspondence with any person who has taken isotretinoin or that person's family or friends referring to isotretinoin or this lawsuit, excluding those post-dating retention of counsel.

5.	All documents referring to the isotretinoin user's communications with physicians, family, or friends about isotretinoin.
6.	All documents referring to any medication – whether prescription or over-the-counter – taken by the isotretinoin user, including medications taken before, during, or after isotretinoin use within the last ten years.
7.	All documents referring to natural or organic supplements or vitamins taken by the isotretinoin user within the last ten years.
8.	All documents referring to creatine use by the isotretinoin user within the last ten years.
9.	All documents referring to steroid use by the isotretinoin user within the last ten years.
10.	All documents referring to any other supplements taken by the isotretinoin user.
11.	All chat room postings regarding isotretinoin, including potential side effects from isotretinoin, isotretinoin warnings or labeling information, or adverse events experienced by users of isotretinoin, excluding those post-dating retention of counsel.
12.	All documents (including correspondence) exchanged with Liam Grant or Congressman Bart Stupak, excluding those post-dating retention of counsel.
13.	All documents referring to Liam Grant or Congressman Bart Stupak, excluding those post-dating retention of counsel.
14.	All information downloaded or otherwise obtained from any website regarding isotretinoin, including potential side effects from isotretinoin, isotretinoin warnings or labeling information, or adverse events experienced by users of isotretinoin, excluding those post-dating retention of counsel.

15. All newspaper articles, journal articles, studies or research regarding acne, isotretinoin, potential side effects from isotretinoin, isotretinoin warnings or labeling information, or adverse events experienced by users of isotretinoin, excluding those post-dating retention of counsel.
16. All documents referring to Defendants, including correspondence with Defendants, excluding those post-dating retention of counsel.
17. All documents referring to any physical, emotional or other condition experienced by the isotretinoin user that is alleged to have been caused by his or her ingestion of isotretinoin.
18. All documents referring to the causes of the isotretinoin user's alleged condition.
19. All prescriptions the isotretinoin user or someone on his or her behalf filled on-line or attempted to fill on-line, within the last ten years.
20. All documents referring to the isotretinoin user's visits to or communications with physicians.

B. Alcohol and Drug Use

Request
1. All documents referring to the use of alcohol (or alcoholism) by the isotretinoin user or his or her family, within the last ten years.
2. All documents referring to the use of tobacco by the isotretinoin user or his or her family, within the last ten years.
3. All documents referring to the use of illegal drugs by the isotretinoin user or his or her family, within the last ten years.

C. Financial Information

Request
1. All documents referring to the isotretinoin user's feelings, concerns, or worries about his or her finances or ability to pay any bill. The time frame for this request is six months prior to the date of first ingestion to the present.

D. Educational Information

Request
1. All documents referring to the isotretinoin user's education, including grades, schoolwork, homework, testing, violations of school rules, disciplinary problems, delinquency, suspensions, expulsions, truancy, or absences (excused or unexcused). The time frame for this request is two years prior to the date of ingestion to the present.
2. All documents referring to the isotretinoin user's participation in extra-curricular, school, or after-school activities, including sports, clubs, newspaper staff, yearbook staff, service organizations, or social organizations. The time frame for this request is two years prior to the date of ingestion to the present.
3. All documents referring to the isotretinoin user's visits to or communications with school counselors or guidance counselors. The time frame for this request is two years prior to the date of ingestion to the present.
4. All school papers or projects (including drafts) about acne, isotretinoin and any gastrointestinal or autoimmune disease, symptoms, conditions or disorders.

5. All documents referring to the isotretinoin user's selection of colleges, the isotretinoin user's applications to colleges, the isotretinoin user's plans for college, the isotretinoin user's feelings or concerns about college (including going away to college), or the isotretinoin user's feelings or concerns about his or her ability to get into college.

6. All documents referring to the isotretinoin user going to college or leaving college.

E. Employment information

Request

1. All documents referring to the isotretinoin user's employment, whether paid or unpaid, temporary or permanent, including salary, promotion, demotion, changes in hours, hiring, firing, quitting, performance reviews, absences (excused or unexcused), violations of workplace rules, suspensions, and altercations, disagreements or fights with co-workers or supervisors. The time frame for this request is two years prior to the date of ingestion to the present.

2. All documents referring to the isotretinoin user changing employment. The time frame for this request is two years prior to the date of ingestion to the present.

3. All documents referring to the isotretinoin user's participation in work-related or career-related clubs or organizations. The time frame for this request is two years prior to the date of ingestion to the present.

4. All documents referring to any workplace accident suffered by the isotretinoin user or his or her claim for worker's compensation. The time frame for this request is two years prior to the date of ingestion to the present.

5. All documents referring to the isotretinoin user seeking or obtaining disability insurance (including failure to obtain disability insurance). The time frame for this request is two years prior to the date of ingestion to the present.

6. All documents referring to the isotretinoin user seeking or obtaining unemployment benefits (including failure to obtain unemployment benefits). The time frame for this request is two years prior to the date of ingestion to the present.

7. All documents referring to the isotretinoin user's plans for future employment. The time frame for this request is two years prior to the date of ingestion to the present.

F. Psychological information

Request

1. All documents relating to any preexisting psychological problems. The time frame for this request is two years prior to the date of ingestion to the present.

2. All documents relating to psychological impact of claimed medical condition. The time frame for this request is two years prior to the date of ingestion to the present.

G. Interaction With Law Enforcement or Weapons

Request
1. All documents referring to the isotretinoin user being arrested, charged with or convicted of any offense. The time frame for this request is two years prior to the date of ingestion to the present. This is subject to confidential treatment.
2. All documents referring to the isotretinoin user being the victim of any crime (including theft, rape, assault, or other violent act), whether or not the perpetrator was charged with a crime. The time frame for this request is two years prior to the date of ingestion to the present. This is subject to confidential treatment.
3. All documents referring to the isotretinoin user experiencing an emotionally, mentally or physically traumatic events such as rape or physical violence. The time frame for this request is two years prior to the date of ingestion to the present. This is subject to confidential treatment.

H. Relationships/Social activities

Request
1. All documents referring to the isotretinoin user's relationship with his or her parents, including any expressions of feeling or emotion, any arguments, any fights, or any insults. The time frame for this request is six months prior to the date of first ingestion to the present.

2. All documents referring to the isotretinoin user's relationships with his or her friends or romantic interests, including any expressions of feeling or emotion, any arguments, any fights, or any insults. The time frame for this request is six months prior to the date of first ingestion to the present.

3. All documents referring to pressure the isotretinoin user felt to succeed in school, sports, extracurricular activities or work. The time frame for this request is six months prior to the date of first ingestion to the present.

4. All documents referring to pressure the isotretinoin user felt to conform or be accepted by peers. The time frame for this request is six months prior to the date of first ingestion to the present.

5. All documents referring to the isotretinoin user's family responsibilities, including chores, housework, and care for siblings or other family members. The time frame for this request is six months prior to the date of first ingestion to the present.

6. All documents referring to conflicts in the isotretinoin user's interpersonal relationships with family, friends, acquaintances, teachers, physicians, co-workers, or supervisors. The time frame for this request is six months prior to the date of first ingestion to the present.

7. All documents referring to the isotretinoin user's hobbies or things he or she liked to do in his or her spare time. The time frame for this request is six months prior to the date of first ingestion to the present.

I. Miscellaneous

Request

<p>1. All documents referring to the isotretinoin user's travel or vacation plans. The time frame for this request is six months prior to the date of first ingestion to the present.</p>
