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**From:** Farina, Thomas P  
**Sent:** Friday, March 12, 2004 12:10 PM  
**To:** DL-Powers\_NE\_J\_Reps  
**Subject:** FW: Follow-up Notice Re: Bextra Document Hold

Highlanders,

FYI.

“There can be only one.”

**Tom Farina**

Brooklyn District Manager – Powers Rx  
PFIZER INC  
1-800-233-7241 x77189

-----Original Message-----

**From:** DMT Communications  
**Sent:** Friday, March 12, 2004 11:51 AM  
**Subject:** Follow-up Notice Re: Bextra Document Hold

Please see the attached important notice from Douglas Lankler, Esq., Pfizer Inc. Senior Corporate Counsel, Corporate Compliance.



Bextra reiterate  
doc hold 3-5...

Date: March 5, 2004  
To: Distribution  
From: Douglas Lankler  
Re: Follow-up Notice Re: Bextra Document Hold

As the Company has previously communicated through its web site, Pfizer is involved in litigation involving Bextra. Any potential documentary evidence, records, files or documents, whether paper, electronic or otherwise, that relate to Bextra must be retained and preserved. Normal record retention policies for Bextra records must be immediately suspended. The obligation to retain these Bextra records applies to records currently in existence as well as records created in the future.

You must retain Bextra records, including memoranda, correspondence, electronic data and any information entered into Company supported databases.

*It is vitally important that you preserve all documents relating to Bextra.*

Pfizer litigation attorneys and outside legal counsel will be contacting you to determine whether you have any Bextra records that may be relevant to this litigation and should be collected.

"Records" as used in this context is very comprehensive and means all records of all forms of communication and any and all other preserved data, in whatever form, including memoranda, letters, computer discs, E-mails, charts, handwritten notes, drafts, files inherited from former employees, archives or any other sources. Three kinds of records merit special attention:

- ◆ E-mail and electronic information records: E-mail and "electronic information" of any kind must be preserved (i.e., any information created, stored, accessible or that uses or can use computer technology). Do not delete any Bextra related E-mail (or attachments to any Bextra-related E-mail) in your "In-box" or any E-mail that you may receive in the future. If your E-mail system is programmed to erase E-mail after a certain length of time, preserve your E-mail by (1) transferring your E-mail to a personal folder for Bextra related E-mail; or (2) transfer your E-mail to a disc. Please be sure any attachments to your E-mail are transferred or printed as well.
- ➔ ◆ Duplicate Records: Even duplicate copies of records must be preserved. Counsel will determine the status and treatment of duplicates.
- ◆ "Personal" Files: There is no distinction between "official" company files and your "personal" files. All potentially relevant Bextra records you wrote, compiled, or received must be preserved, including any copies you have saved separately from any "official" or "Company" file.

Please do not review, sort, categorize, analyze, index, summarize, digest, or screen records in your possession or custody which refer or relate to Bextra, but only identify and retain them intact. It is

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advantageous to assure that the records are preserved in exactly the way they were maintained in the ordinary course of business and disadvantageous to disturb that order.

Please do not mark up "identified" records and do not create additional records relating to this Bextra records collection and review effort. It is solely the obligation and responsibility of Pfizer's lawyers to review and analyze the records for litigation and regulatory purposes and to prepare documentation pertaining to the Bextra records collection and review.

The lawyers handling the case will make arrangements for segregating and copying the Bextra records and will also complete appropriate determinations concerning relevancy and attorney-client and attorney work product privileges.

In addition, you may be contacted by those outside the Company requesting comments that may relate to the litigation. Refer all such inquiries, as well as any questions you may have about the preservation and collection of Bextra records, to the following for advice:

- (1) Douglas Lankler, Esq.  
Telephone: (212) 733-0752
- (2) Salvatore Colletti, Esq.  
Telephone: (212) 733-7596
- (3) Gary Giampetruzzi, Esq.  
Telephone: (212) 733-8471
- (4) Stephen O'Sullivan, Esq.  
Telephone: (847) 945-5870
- (5) Kathryn Kullman  
Telephone: (847) 945- 5872

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Please forward this memo to any and all members of your groups who may also have Bextra documents.

Again, our efforts are a continuing obligation, so new records as they are created will be subject to the requirement that they be preserved. Thank you in advance for your cooperation and assistance.

Douglas Lankler

Copies to:

- (1) Salvatore Colletti, Esq.
- (2) Gary Giampetruzzi, Esq.
- (3) Kathryn Kullman
- (4) Francis W. Mettrick, Esq.
- (5) Stephen O'Sullivan, Esq.
- (6) Allen P. Waxman, Esq.

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