

ORIGINAL

FILED
MAR 26 2004
U.S. COURT OF
FEDERAL CLAIMS

IN THE UNITED STATES COURT OF FEDERAL CLAIMS
OFFICE OF SPECIAL MASTERS

IN RE: CLAIMS FOR VACCINE
INJURIES RESULTING IN AUTISM
SPECTRUM DISORDER, OR A SIMILAR
DEVELOPMENTAL DISORDER,

Petitioners,

v.

SECRETARY OF HEALTH AND
HUMAN SERVICES,

Respondent.

AUTISM MASTER FILE
Special Master George Hasting

**PETITIONERS' EXHIBIT B TO THE
MOTION TO ISSUE A SUBPOENA TO
MERCK & CO., INC., RE THE MMR
VACCINE**

EXHIBIT B

Petitioners' append this Exhibit B to their *Motion to Issue a Subpoena to Merck & Co., Inc., re the MMR Vaccine*, originally filed with the Clerk of this Court on March 23, 2004.

As discussed in the Motion and Memorandum of Law at pages 13-14, petitioners have identified the following portions of the Merck MMR product license application (PLA) that ought to be disclosed to petitioners because they may contain information reasonably necessary to the general causation inquiry at issue.

In assembling this Exhibit, petitioners divided the requested pages into two categories.¹ First, there are pages that are simply blank, where one cannot tell from the surrounding pages or other context what, if anything, might be on those pages. Petitioners believe that direct

¹ As noted in their Motion, petitioners do *not* seek disclosure or production of material that is obviously not relevant, where the irrelevance can be inferred from accompanying pages or other context. For this reason there are blank or redacted pages that are not listed in this Exhibit, and petitioners do not seek disclosure or production of any pages in the Merck MMR PLA unless specified herein.

Petitioners' Exhibit B To The Motion To Issue A Subpoena
To Merck & Co., Inc., Re The MMR Vaccine

Page 1

(Exhibit B has been filed into the Master Autism File, but the rest of the exhibit, beyond Page 1, is not being placed on the website for the Omnibus Proceeding due to the provisions of 42 U.S.C. § 300aa-12(d)(4)(A).)

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2004, I served the foregoing **PETITIONERS' EXHIBIT B TO THE MOTION TO ISSUE A SUBPOENA TO MERCK & CO., INC., RE THE MMR VACCINE** on the following individual(s):

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by United Parcel Service, next day delivery.



Brenda D. Steinle
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CERTIFICATE OF SERVICE