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May 21, 2004

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TO ALL SCHERING-PLOUGH CLIENTS AND POTENTIAL CLIENTS

Re: Giannini v. SCHERING-Plough, et. al.
Alameda County Superior Court Case No. RGO 3123180

Dear Client:

This is a summary status report on the actions against Schering-Plough, the manufacturer of PEG-Intron and Rebetol.

In order to properly handle this matter, which will be a major battle with Schering-Plough, I have associated two law firms to assist me with this matter. Masry & Vititoe is a firm that was associated with handling the Erin Brokovich case, which was eventually made into a movie which you may have seen. The Law Offices of Charles S. LiMandri has a number of talented litigation attorneys familiar with handling major litigation, including litigation against drug companies. Those firms, in addition to Law Offices of Patrick E. Catalano, will make up a litigation team which will move aggressively against Schering-Plough with regard to the injuries sustained by you.

At present, the firms have retained a consultant to review the submissions of Schering-Plough to the FDA and to investigate the potential liability of Schering-Plough based on several theories, including failure to warn, failure to properly manufacture and other theories of liability.

It is imperative that each of you who wish to join in this lawsuit sign the enclosed Attorney-Client Agreement and fill out the attached Questionnaire so that your name will be placed in the litigation. Anyone who does not sign the enclosed Agreement will not be represented and we will not be in a position to protect your rights.

Although our investigation has resulted in some favorable findings, a full assessment of the case has not been determined as of yet.

If any of you wish to join into this lawsuit, you must sign the enclosed Agreement, send it back by facsimile and mail the original Agreement immediately to the Law Offices of Patrick E. Catalano's San Diego office, located at 501 West Broadway, Suite 740, San Diego, California, 92101-3544. If you need to take longer to fill out and return the Questionnaire you may do so, but ideally I would like to have the Agreement and Questionnaire filled out and returned as soon as possible. Do not let filling out the Questionnaire hold up your returning the Agreement.

It is important to determine where the specific product that you utilized was manufactured. Therefore, if you have any documents regarding its purchase or any receipts of purchase, please provide copies of them with your Questionnaire.

At present, the assessment of liability against the drug manufacturer Schering-Plough takes priority. The individual interviews with each client will not take place until we have a handle on assessing liability against Schering-Plough for the damage the drug(s) has done to each of you. It is helpful if you provide a written history of these matters with the Questionnaire. It would be impractical, in view of the number of clients that are joining this suit, to interview personally each and every client at this point regarding their medical history. This is the reason for the Questionnaire, which will assess each of your present conditions in an easily referable manner.

Again, it is important that you return the Attorney-Client Agreements as soon as possible. Please print the form so that it can be accurately input into our computer database.

Thank you for considering our firms for handling this matter, and we hope to represent you aggressively in the future.

Very truly yours,

LAW OFFICES OF PATRICK E. CATALANO

By: _____
Patrick E. Catalano, Esq.

PEC:jk

Enclosures