

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

SHAHEED MUHAMMAD,

Plaintiff,

v.

ELI LILLY AND COMPANY; and
YOLANDA BROWN, Sales
Representative, and FICTITIOUS
DEFENDANTS A, B, C, D, E, and F,
being those persons, sales representatives,
firms or corporations, whose fraud,
scheme to defraud, negligence, and/or
other wrongful conduct caused or
contributed to the Plaintiff's injuries and
damages, and whose true names and
identities are presently unknown to the
Plaintiff but will be substituted by
amendment when ascertained,

Defendants.

CASE NO.: _____

DECLARATION OF YOLANDA
MCCAIN

DECLARATION OF YOLANDA MCCAIN

Yolanda McCain, under penalty of perjury, states as follows:

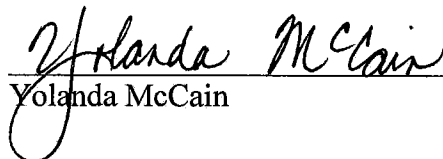
1. I have been previously known as "Yolanda Brown."
2. I am employed as a sales representative for Eli Lilly and Company ("Lilly"). The facts set forth herein are based upon my personal knowledge.
3. I am informed by Lilly that I was named as a defendant in this case. Plaintiff has not attempted service upon me as of the date of this declaration. I have consented to the removal of this case to federal court.
4. My knowledge of Zyprexa® was derived exclusively from training materials and education provided to me by Lilly. Lilly provided FDA-approved package inserts and other information regarding the medicines I detailed, including Zyprexa®. I had no involvement in the manufacture or development of Zyprexa®, or the preparation of package inserts, and had no control over content or other written warnings.

5. As a sales representative, I was not expected to conduct any independent research regarding the medicines that I detailed and I never conducted any such research. I was not expected to, and did not, review any independent scientific studies published in journals unless they were specifically provided to me by Lilly.

6. My responsibilities as a sale representative are to provide approved information to physicians about certain prescription medicines sold by Lilly. All my work relating to Zyprexa® was within the scope of my employment by Lilly.

I declare under penalty of perjury under the laws of the United States of America, 28 U.S.C. § 1746, that the foregoing is true and correct.

Date: October 28, 2005



Yolanda McCain