

FILED

14 SEP 2012 05:38 pm

Civil Administration

J. EVERS

EXHIBIT A

IN RE: RISPERDAL[®] LITIGATION
March Term 2010, No. 296

A.B., a minor, by Jennie Rolen, Guardian,
and

Jennie Rolen, Individually,
Plaintiffs,

v.

Janssen Pharmaceuticals, Inc.;
Johnson & Johnson; and Janssen
Research & Development, LLC;
Excerpta Medica, Inc.; and
Elsevier Inc.,

Defendants.

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS
TRIAL DIVISION

JANUARY TERM 2010
No. 649

AFFIDAVIT

Kathleen Torok, being duly sworn according to law hereby deposes and says that:

1. I am a Senior Executive Committee Assistant. I have been employee of Johnson & Johnson since February 1978.
2. I have been Alex Gorsky's executive assistant since January 31, 2011.
3. I am responsible for all administrative tasks for Mr. Gorsky, including maintenance of his calendar and securing his travel arrangements.
4. I understand that Plaintiffs are seeking to compel Mr. Gorsky to appear at trial in Philadelphia on September 26, 2012.
5. On September 24, 2012, Mr. Gorsky will be traveling to Asia. He will be attending and/or leading meetings in Tokyo and Beijing on September 25-27, 2012. During these three days, Mr. Gorsky has multiple preplanned engagements. On September 25, 2012, Mr. Gorsky is meeting in Tokyo with the former Minister of Health Yoichi Masuzoe to discuss the outlook for health policy in Japan. He is also meeting with Dr. Yoichi Matsumoto, Secretary

General of the Office of Medical Innovation, and Dr. Hiromichi Kimura, Professor of Pharmacology Business Innovation at the University of Tokyo, Graduate School of Pharmaceutical Science. That evening, he is meeting with the presidents of the Asian operating companies and other regional guests to discuss business and market conditions. On September 26, 2012, he is conducting a town hall meeting with 180 Japan employees of the J&J family of companies. He will then transfer to Beijing, where he is meeting with the J&J China President's Council. On September 27, 2012, Mr. Gorsky is participating in multiple business meetings. He is also conducting a town hall meeting with 600 China employees of the J&J family of companies. Next, he is participating in a ceremony at the Terracotta Warriors Museum, which will be attended by 60 employees of the J&J family of companies. Finally, he is giving a speech to 400 students from Tsinghua University and other China universities in Beijing.

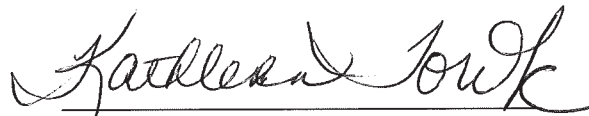
6. Mr. Gorsky's visit to Asia has been planned since May 2012. More than 1,000 people are planning to attend these meetings and have adjusted their schedules accordingly.

7. On September 27, 2012, Mr. Gorsky will be traveling from Beijing back to the United States.

8. Mr. Gorsky will return to New Jersey on September 30, 2012 and will be available to appear in Court on October 1, 2012, if so ordered.

9. On October 3, 2012, Mr. Gorsky is a scheduled speaker at a life sciences meeting in Atlanta, Georgia. It is expected that as many as 1,000 senior executives, scientists, physicians and public policy experts will attend this full-day conference to discuss current innovations and trends for global health.

I hereby acknowledge that the above statements are true to the best of my knowledge and information and understand that I am subject to criminal penalties for knowingly false statements.


Kathleen Torok



TERESA E. WILLIAMS
NOTARY PUBLIC
STATE OF NEW JERSEY
MY COMMISSION EXPIRES OCT. 14, 2014