

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MARY K. JONES, Individually and on Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

PFIZER INC., et al.,

Defendants.

Civil Action No. 1:10-cv-03864-AKH

Hon. Alvin K. Hellerstein

**ORAL ARGUMENT REQUESTED**

DECLARATION OF DEE MAHONEY

Pursuant to 28 U.S.C., Section 1746, I declare that:

1 I am a former employee of Pfizer, Inc. and a third-party witness in this action who was deposed by plaintiffs on July 19, 2013.

2. On January 7, 2015, I received a trial subpoena at my home in Bethesda, Maryland where I have lived since June 2012. The subpoena issued by plaintiffs was dated December 30, 2014, and commanded my appearance at a "hearing or trial" in this matter at the United States Courthouse at 500 Pearl Street, New York, New York (the "Courthouse") on January 26, 2015 at 9:00 am.

3. I am not a resident of New York State. Nor do I reside within 100 miles of the Courthouse.

4. I do not have an office or regularly transact business in person, in New York State. Nor do I maintain an office or regularly transact business in person, within 100 miles of the Courthouse.

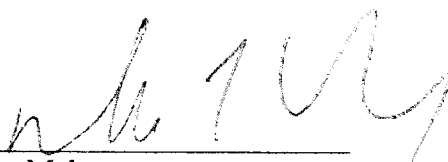
5. The only business I transact, in person, within New York State or within 100 miles of the Courthouse is as follows: Before moving to the D.C. metro area in 2010, I and my business partner formed DMH BioPharm Advisors, LLC, a consulting practice organized as a New Jersey LLC. DMH BioPharm Advisors, LLC, is not a party or witness to this action. I work from Maryland and my partner works from her home in New Jersey which is within 100 miles of the Courthouse.

6. DMH BioPharm Advisors, LLC is engaged by pharmaceutical companies to review their practices and make presentations to their employees on current compliance issues. In 2014, I spent a total of 2 days in New York State or in a location within 100 miles of the Courthouse to provide services for which my company was engaged by a client pharmaceutical company.

7. The only other business-related travel I made to New York State or to within 100 miles of the Courthouse in 2014 were three (3) days I spent in meetings with my business partner and four (4) days spent meeting prospective clients. No business transactions were conducted on these occasions.

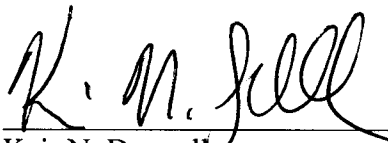
8. I have not travelled to New York State or to within 100 miles of the Courthouse for any purpose in 2015.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 24, 2015.

  
\_\_\_\_\_  
Dee Mahoney

CERTIFICATE OF SERVICE

I hereby certify that on January 24, 2015, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system and thereby served to all parties of record.

A handwritten signature in black ink, appearing to read "K. N. Dougall", written over a horizontal line.

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**Regan Karstrand**

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**U.S. District Court**

**Southern District of New York**

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**Case Name:** Jones et al v. Pfizer, Inc. et al  
**Case Number:** [1:10-cv-03864-AKH](#)  
**Filer:** Dee Mahoney  
**Document Number:** [454](#)

**Docket Text:**

**[MOTION to Quash Plaintiff's Trial Subpoena of Dee Mahoney - Declaration of Dee Mahoney in Support of Docket Entry 453. Document filed by Dee Mahoney.\(Dougall, Keir\)](#)**

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