

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARY K. JONES, Individually and on Behalf	:	Civil Action No. 1:10-cv-03864-AKH
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff	:	
	:	DECLARATION OF WILLOW E.
vs.	:	RADCLIFFE IN SUPPORT OF
	:	PLAINTIFFS' COMBINED RESPONSE TO
PFIZER INC., et al.,	:	MOTIONS TO QUASH TRIAL
	:	SUBPOENAS TO NON-PARTIES DEE
Defendants.	:	MAHONEY AND MARY HOLLOWAY
<hr/>		X

I, WILLOW E. RADCLIFFE, declare as follows:

1. I am a member of the law firm of Robbins Geller Rudman & Dowd LLP and counsel of record for plaintiffs in the above-entitled action. I am duly licensed to practice before all courts of the State of California and admitted *pro hac vice* in this case. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. On the morning of January 29, 2015, I received via ECF, notice of the Court's Order vacating the February 10, 2015 trial date and the February 9, 2015 hearing date on all outstanding motions. Dkt. No. 459.

3. On January 29, 2015, I called and left a voicemail message for Keir N. Dougall informing him that the trial date had been vacated and inquiring about advising the Court regarding Dee Mahoney's motion to quash the trial subpoena.

4. Having not received a return call from Mr. Dougall, on January 29, 2015, I sent Mr. Dougall and Cynthia M. Monaco, counsel of record for Dee Mahoney and Mary Holloway, an e-mail. A true and correct copy of that e-mail is attached hereto as Exhibit 1.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed February 3, 2015, at San Francisco, California.

s/ WILLOW E. RADCLIFFE

WILLOW E. RADCLIFFE

CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2015, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 3, 2015.

s/ WILLOW E. RADCLIFFE

WILLOW E. RADCLIFFE

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Manual Notice List

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EXHIBIT 1

Willow Radcliffe

From: Willow Radcliffe
Sent: Thursday, January 29, 2015 4:38 PM
To: 'kdougall@dougallpc.com'
Cc: 'cmonaco@cynthiamonacolaw.com'; Henry Rosen
Subject: Jones v. Pfizer - Trial Subpoena to Dee Mahoney

Dear Counsel:

I am writing in furtherance of my voicemail earlier today. As I indicated previously, the Court has vacated the trial date in the above-referenced action. In light of the Court's Order, we think it would be in the best interests of all concerned for Ms. Mahoney's motion to quash to be withdrawn (with each party to bear their own costs). In exchange, we will withdraw the current trial subpoena. Thank you for your attention to this matter.

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**Robbins Geller
Rudman & Dowd LLP**

Regan Karstrand

From: NYSJ_ECF_Pool@nysd.uscourts.gov
Sent: Tuesday, February 03, 2015 5:32 PM
To: CourtMail@nysd.uscourts.gov
Subject: Activity in Case 1:10-cv-03864-AKH Jones et al v. Pfizer, Inc. et al Declaration in Opposition to Motion

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

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U.S. District Court

Southern District of New York

Notice of Electronic Filing

The following transaction was entered by Radcliffe, Willow on 2/3/2015 at 5:31 PM EST and filed on 2/3/2015

Case Name: Jones et al v. Pfizer, Inc. et al
Case Number: [1:10-cv-03864-AKH](#)
Filer: Mary K. Jones
Stichting Philips Pensioenfonds

Document Number: [463](#)

Docket Text:

DECLARATION of Willow E. Radcliffe in Opposition re: [460] MOTION to Quash Plaintiffs' Trial Subpoena of Mary Holloway - *Notice of Motion.*, [453] MOTION to Quash Plaintiff's Trial Subpoena of Dee Mahoney - *Notice of Motion.* Document filed by Mary K. Jones(Individually), Stichting Philips Pensioenfonds. (Attachments: # (1) Exhibit 1)(Radcliffe, Willow)

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9ed94ee4134d6f8f2f9862464eb0f38ecb46467711ac6035b8d702767892f]]

Document description:Exhibit 1

Original filename:n/a

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