

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	:	
	:	NOTICE OF JOINT MOTION TO FILE
vs.	:	UNDER SEAL
	:	
PFIZER INC., et al.,	:	
	:	
Defendants.	:	
<hr/>		X

PLEASE TAKE NOTICE that, in accordance with Paragraph 7 of the Stipulated Protective Order (the “Protective Order”) in this case, Dkt. No. 93, the parties in the above-captioned matter, by their counsel, shall move, before the Honorable Alvin K. Hellerstein, U.S. District Judge, United States District Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time as may be designated by the Court, for an Order (attached hereto as Exhibit 1) permitting the filing of the parties’ October 18, 2013 Joint Letter and Exhibits C-R and U-V thereto, under seal. The Joint Letter, and these exhibits, contain information that has been designated confidential pursuant to the terms of the parties’ Protective Order.

By this motion, the parties seek only to comply with Paragraph 7 of the Protective Order; any party seeking to maintain the seal as to those documents may make an appropriate submission to the Court, as provided by the Protective Order. Accordingly, the parties respectfully request leave to file the October 18, 2013 Joint Letter and Exhibits C-R and U-V under seal.

DATED: October 18, 2013

Respectfully submitted,

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DATED: October 18, 2013

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CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2013, 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 October 18, 2013.

s/ HENRY ROSEN
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EXHIBIT 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____	X	
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	:	
	:	[PROPOSED] ORDER GRANTING JOINT
vs.	:	MOTION TO FILE UNDER SEAL
	:	
PFIZER INC., et al.,	:	
	:	
Defendants.	:	
_____	X	

Having considered the parties' Joint Motion to File Under Seal, and good cause appearing therefore, the Court hereby GRANTS the motion.

The parties' October 18, 2013 Joint Letter and Exhibits C-R and U-V thereto, SHALL BE MAINTAINED UNDER SEAL, subject to further order of this Court.

* * *

ORDER

IT IS SO ORDERED.

DATED: _____

THE HONORABLE ALVIN K. HELLERSTEIN
UNITED STATES DISTRICT JUDGE