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February 19, 2014

ELECTRONICALLY FILED/FACSIMILE

The Honorable Alvin K. Hellerstein
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *Jones v. Pfizer Inc., et al.*
Civil Action No. 1:10-cv-03864-AKH (S.D.N.Y.)

Dear Judge Hellerstein:

The parties in the above-referenced case jointly write the Court in advance of the February 21, 2014 status conference. Fact discovery is now complete, with the last witness having been deposed last Friday. All told, more than 23 million pages of documents were produced in discovery by the parties and third parties, with 42 fact witnesses deposed. There are no pending discovery disputes requiring Court intervention.

Pursuant to the Court's Civil Case Management Plan, the parties have conferred regarding the next steps in the litigation. The parties agree that the completion of expert discovery prior to the filing of dispositive motions makes sense. Plaintiffs and defendants expect that they will offer expert testimony on a number of issues relevant to summary judgment, including whether defendants made false and misleading statements, whether the company's financial statements complied with Generally Accepted Accounting Principles ("GAAP"), and whether plaintiffs can establish loss causation. Attached as Exhibit A is a proposed schedule with agreed-upon dates for expert discovery and summary judgment briefing.

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Robbins Geller
Rudman & Dowd LLP

The Honorable Alvin K. Hellerstein
United States District Judge
February 19, 2014
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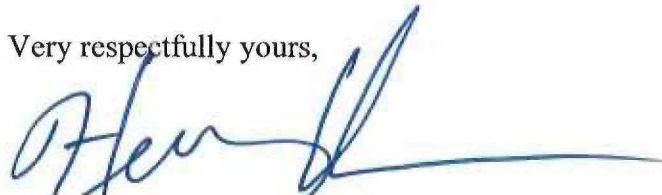
Also pursuant to the Court's Civil Case Management Plan, the parties conducted a mediation on November 15, 2013, before the Honorable Layn R. Phillips (Ret.) at his offices in Newport Beach, California. At this time, the parties do not believe further mediation sessions would be fruitful.

Very respectfully yours,



STEVEN FARINA
WILLIAMS & CONNOLLY LLP

Very respectfully yours,



HENRY ROSEN
ROBBINS GELLER RUDMAN & DOWD LLP

HR:dlh

CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2014, 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 19, 2014.

s/ HENRY ROSEN

HENRY ROSEN

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Manual Notice List

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EXHIBIT A

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

[PROPOSED] CASE MANAGEMENT ORDER

The following deadlines shall govern expert discovery and summary judgment briefing in this Action:

1. Plaintiffs shall designate their experts and provide a brief description of what they will testify to no later than March 21, 2014;
2. Defendants shall designate their experts and provide a brief description of what they will testify to no later than April 25, 2014;
3. Plaintiffs shall designate their rebuttal experts, if any, and provide a brief description of what they will testify to no later than May 23, 2014;
4. Plaintiffs shall submit reports for their designated experts as required by Fed. R. Civ. P. 26 no later than June 10, 2014;
5. Defendants shall submit reports for their designated experts as required by Fed. R. Civ. P. 26 no later than July 15, 2014;
6. The parties shall complete expert discovery no later than August 29, 2014;

7. Summary judgment motions are due October 3, 2014;
8. Oppositions to summary judgment motions are due November 14, 2014; and
9. Replies in support of summary judgment motions are due December 12, 2014.

SO ORDERED:

THE HONORABLE ALVIN K. HELLERSTEIN
UNITED STATES DISTRICT JUDGE