

BRANDON V. SULLIVAN, JR.
 JERRY I. SHULMAN
 ROBERT B. BARNETT
 DAVID E. KENDALL
 JOHN J. BUCKLEY, JR.
 TERENCE O'DONNELL
 DOUGLAS R. MARVIN
 JOHN K. VILLA
 BARRY S. SIMON
 KEVIN T. BAINE
 STEPHEN L. UKRANCIK
 PHILIP J. WARD
 F. WHITTEN PETERS
 JAMES A. BRUTON, III
 PETER J. KAHN
 MICHAEL S. SUNDERMEYER
 JAMES T. FULLER, III
 DAVID D. AUFHAUSER
 BRUCE R. GINDOFFSON
 F. LANE HEARD III
 STEVEN K. KUNEY
 PAUL MOON
 MARK S. LEVINSTEIN
 DANIEL F. KATZ
 WILLIAM R. MURRAY, JR.
 EVA PETKO ESBER
 STEPHEN D. RABEK
 DAVID C. KIERNAN
 LON B. MUSSELWHITE
 HEIDI K. HUBBARD
 GLENN J. SPADENMAUER
 GEORGE A. BORDEN
 ROBERT J. SHUGHNESSY
 DAVID S. BLATT

DANE H. BUTSWINKAS
 LAURIE J. FULTON
 DENNIS M. BLACE
 LYNDIA SCHULER
 CHARLES D. NIEMEIER
 PAUL K. DUEFFERT
 R. MACKINLEY WIEDMANN
 RONERT M. GARY
 KEVIN M. HODGES
 DAVID M. ZINN
 JOSEPH G. PETROSINELLI
 STEVEN M. FARINA
 KEVIN M. DOWNEY
 THOMAS G. HENTTOFF
 PAUL B. GAFFNEY
 EMMET T. HOOD
 ROBERT A. VAN KURK
 MARGIE R. ZIEGLER
 KENNETH C. SMURZYNSKI
 JOHN E. SCHMIDTLEIN
 CRAIG D. SINGER
 J. ANDREW KEYES
 M. ELAINE HORN
 ENO MANNIG
 MICHAEL F. O'CONNOR
 PAUL T. HOURDAN
 WILLIAM J. BACHMAN
 MARGARET A. KEBLEY
 EDWARD J. BENNETT
 TOBIN J. ROMERO
 BETH A. LEVINE
 THOMAS G. WARD
 WILLIAM T. BURKE
 LISA M. DUGGAN

LAW OFFICES
WILLIAMS & CONNOLLY LLP*

725 TWELFTH STREET, N.W.
 WASHINGTON, D. C. 20005-5901

(202) 434-5000

FAX (202) 434-5029

WWW.WC.COM

EDWARD BENNETT WILLIAMS (1922-1988)
 PAUL R. CONNOLLY (1922-1978)

JOHN E. JOINER
 NICHOLAS J. BOYLE
 ADAM L. PERLMAN
 ANDREW W. RUDGE
 DENISE C. HOWELL
 ALEX C. ROMAIN
 DAVID A. KORKNER
 JONATHAN M. LANDY
 CHRISTOPHER N. MANNING
 RYAN T. SCARBOROUGH
 JENNIFER G. WIGHT
 STEPHEN D. ANDREWS
 KANNON K. SHANMUGAM
 MALACHI B. JONES
 THOMAS H. L. SELBY
 KEVIN HARDY
 EDWARD C. HARNIDGE
 JOSEPH M. TERRY
 AARON P. MALTRIP
 JON R. FETTEROLF
 K. GREG BOWMAN
 ANA C. KEYES
 JONATHAN B. PITT
 DAVID I. BERL
 ELLEN E. COERWETTER
 EDWARD G. REDDINGTON
 DANIEL R. SHANAHAN
 VIDYA ATRÉ MURMILA
 JESSAMYN S. BERNIKER
 RICHMOND T. MOORE
 KENNETH J. BROWN
 LUBA SHUR
 PATRICK H. KIM
 WILLIAM R. ASHWORTH

LANCE A. WADE
 CHARLES DAVANT, IV
 DOV P. CROSSMAN
 HOLLY M. CONLEY
 MATTHEW V. JOHNSON
 CARL R. METZ
 JOHN MCHUGHES
 DAVID S. RYZYER-ELLENBOGEN
 PAUL E. KOENIG
 STEPHEN J. RIZESI
 KATHERINE M. TURNER
 JESSE T. SMALLWOOD
 STANLEY E. FISHER
 JOHN S. WILLIAMS
 C. BRYAN WILSON
 SAMUEL B. DAVIDOFF
 AMANDA M. MACDONALD
 BETH A. STEWART
 STEVEN M. PYSER
 GRANT A. CEYERMAN
 DAVID M. KRINSKY

OF COUNSEL
 JEREMIAH G. COLLINS
 DAVID POWICH
 JOHN W. VARDAMAN
 PAUL MARTIN WOLFF
 JOHN G. KESTER
 WILLIAM E. McDONNELL
 RICHARD M. COOPER
 ROBERT P. WATKINS
 GERSON A. ZWEIFACH

USDC SDNY
 DOCUMENT
 ELECTRONICALLY FILED
 DOC #:
 DATE FILED: 6/27/14

JUN 27 2014
 RECEIVED
 CHAMBERS OF
 ALVIN K. HELLERSTEIN
 U.S.D.J.

The reports identified by both sides seem excessive to their actual respective needs. Counsel shall appear before me on July 7, 2014, 4⁰⁰ pm.

To discuss a reduction in their number, and to complete depositions by August 29, 2014.

6-27-14

Alvin K. Hellerstein

VIA FACSIMILE

The Honorable Alvin K. Hellerstein
 United States District Court,
 Southern District of New York
 500 Pearl Street Room 1050
 New York, NY 10007

Re: *Mary K. Jones v. Pfizer Inc., et al.*
 Civil Action No. 1:10-cv-03864-AKH

Dear Judge Hellerstein:

I write on behalf of both parties in this case.

The parties currently are engaged in expert discovery. Plaintiffs' expert reports were served on June 10; Defendants' expert reports are due on July 15. Plaintiffs have designated 10 expert witnesses and defendants have designated 14 expert witnesses, for a total of 24 expert witnesses. The Parties have been proactively attempting to schedule expert depositions. This has proven extraordinarily difficult given the professional obligations of many of these experts (who include practicing physicians, academics, etc.), as well as the unavailability of many witnesses in August. Taking all of this into account, the parties have agreed upon a schedule, which is set out below, that completes all expert depositions by October 24, 2014.

- Jewell Tuesday, July 22
- O'Brien Friday, July 25
- Rosenheck Monday, July 28
- Buthusiem Friday, August 1
- Claww Tuesday, August 5
- Avorn Thursday, August 7
- Regan Tuesday, August 12

The Honorable Alvin K. Hellerstein
June 27, 2014
Page 2

Beale	Thursday, August 14
McEvoy.....	Friday, August 15
Panchal.....	Friday, August 22
Tanselle.....	Thursday, August 28
Scharfstein.....	Friday, September 5
Rosenthal.....	Thursday, September 11
Theodorou.....	Tuesday, September 16
Baum.....	Tuesday, September 23
Grabowski.....	Friday, September 26
Waxman.....	Tuesday, September 30
Coates.....	Friday, October 3
Pelliccioni.....	Tuesday, October 7
Nicholson.....	Friday, October 10
Feinstein.....	Tuesday, October 14
Holder.....	Friday, October 17
Feigal.....	Wednesday, October 22
Lehn.....	Friday, October 24

The current deadline for the completion of expert discovery, agreed upon prior to the disclosure of experts, is August 29. For the reasons set out above, we ask that the Court endorse the modified schedule that the parties jointly propose. This is the first request for an extension of the expert discovery schedule.

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP

WILLIAMS & CONNOLLY LLP

By: Henry Rosen / AR
Henry Rosen
655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: (619) 231-1058
Facsimile: (619) 231-7423
henryr@rgrdlaw.com

By: Steven M. Farina / SM
Steven M. Farina
725 Twelfth Street, N.W.
Washington, DC 20005
Telephone: (202) 434-5000
Facsimile: (202) 434-5029
sfarina@wc.com

Judge wrote:

“The experts identified by both sides seem excessive to their actual respective needs. Counsel shall appear before me on July 7, 2014, 4:00 pm to discuss a reduction in their number, and to complete discovery by August 29, 2014.

6-27-14

Alvin K. Hellerstein”