

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

**NOTICE OF MOTION TO FILE SELECTED EXHIBITS UNDER SEAL**

PLEASE TAKE NOTICE THAT Defendant Pfizer Inc. (“Pfizer”), by its counsel, will move the United States District Court for the Southern District of New York, on a date and at such time as may be designated by the Court, located in the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, for an order permitting Pfizer to file under seal Exhibits C-4, D-4, E-4, F-4, G-4, H-4, I-4, J-4, K-4, L-4, M-4, N-4, O-4, P-4, R-4, S-4, T-4, U-4, V-4, W-4, X-4, Y-4, Z-4, A-5, B-5, D-5, and E-5 to the Declaration of Joseph G. Petrosinelli in Support of Pfizer’s Motion for Summary Judgment (“Petrosinelli Declaration”). These documents were produced in the above-captioned litigation by a third party, KPMG, and were designated by KPMG at the time of production as “Confidential” pursuant to the Stipulated Protective Order (“Protective Order”), approved by the Court on October 18, 2011 (Dkt. No. 93). Accordingly, pursuant to Paragraph 7 of the Protective Order, Pfizer respectfully requests leave to file Exhibits C-4; D-4, E-4, F-4, G-4, H-4, I-4, J-4, K-4, L-4, M-4, N-4, O-4, P-4, R-4, S-4, T-4, U-4, V-4, W-4, X-4, Y-4, Z-4, A-5, B-5, D-5, and E-5 to the Petrosinelli Declaration under seal.

Date: Washington, D.C.  
October 30, 2014

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

By: 

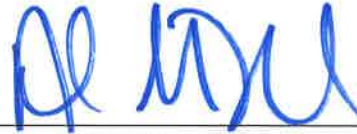
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**CERTIFICATE OF SERVICE**

I hereby certify that, on this 30th day of October, 2014, the foregoing Notice of Motion to File Selected Exhibits Under Seal was filed with the Court through the CM/ECF system and thereby served to all counsel of record.



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**Sent:** Thursday, October 30, 2014 6:13 AM  
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**U.S. District Court**

**Southern District of New York**

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The following transaction was entered by MacDonald, Amanda on 10/30/2014 at 9:12 AM EDT and filed on 10/30/2014

**Case Name:** Jones et al v. Pfizer, Inc. et al  
**Case Number:** [1:10-cv-03864-AKH](#)  
**Filer:** Pfizer, Inc.  
**Document Number:** [245](#)

**Docket Text:**

**[MOTION to Seal Selected Exhibits to Petrosinelli Declaration. Document filed by Pfizer, Inc..\(MacDonald, Amanda\)](#)**

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