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

REPLY MEMORANDUM OF LAW OF DEFENDANT JEFFREY B. KINDLER IN SUPPORT OF SUMMARY JUDGMENT

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Defendant Jeffrey B. Kindler respectfully submits this reply memorandum of law in support of his motion for summary judgment pursuant to Rule 56 of the Federal Rules of Civil Procedure.[1]

PRELIMINARY STATEMENT

Plaintiffs' opposition brief utterly fails to rebut Mr. Kindler's argument that there is no evidence supporting plaintiffs' allegation that Mr. Kindler intended to defraud investors. As Mr. Kindler demonstrated in his opening brief, this *complete absence* of any evidence of scienter requires judgment as a matter of law in his favor on plaintiffs' securities claim. Plaintiffs' opposition fails to answer that showing. It points to no evidence—no document and no testimony—that could create a genuine issue of fact as to whether Mr. Kindler intended to mislead investors. There is no evidence that Mr. Kindler improperly revised or manipulated Pfizer's disclosures, mischaracterized facts, countermanded the advice of others, frustrated efforts to make different disclosures or acted with reckless disregard for the accuracy of the disclosures that were made.

Plaintiffs instead seek to redirect the Court's attention to purported evidence that Mr. Kindler was advised of certain matters relating to the government's investigation into the marketing of Bextra and other drugs. But those assertions, even if credited, provide no evidence at all that Mr. Kindler intended for Pfizer's disclosures to mislead investors. On that critical subject, plaintiffs offer no proof whatsoever. They supply no link, no connection between the investigation and Mr. Kindler's conduct with regard to Pfizer's disclosures that would support their theory of fraud. The complete failure to adduce

[1] Mr. Kindler also seeks summary judgment on the grounds asserted by the other defendants insofar as they are applicable to him, and incorporates by reference their memoranda of law in support of their respective motions for summary judgment.

affirmative evidence as to the essential element of scienter requires a ruling for Mr. Kindler on summary judgment.

Apart from plaintiffs' failure of proof, Mr. Kindler demonstrated in his opening brief that there is extensive, unrebutted record evidence that he relied in good faith on Pfizer's advisors and processes for making disclosures and accrual determinations—and that this showing affirmatively *negates* any possible inference of scienter. Plaintiffs' opposition responds with the non sequitur that an executive's reliance on the advice of counsel is not a complete defense, only one factor to consider in determining scienter. But, Mr. Kindler is not asserting on this motion that he is entitled to summary judgment because the record conclusively proves an affirmative advice-of-counsel defense. His argument, rather, on this second point is that the extensive and unrebutted evidence of his affirmative good faith reliance on Pfizer's inside and outside disclosure counsel and accounting professionals precludes any possibility that plaintiffs could prove scienter at trial.

As predicted, plaintiffs seek to avoid the implications of the extensive record of Mr. Kindler's good faith by arguing that the assurances and advice that Mr. Kindler received were wrong, and that his reliance on Pfizer's disclosure advisors and processes was misplaced. As Pfizer's briefs in support of summary judgment have shown, Pfizer's disclosures and accrual determinations were in fact proper as a matter of law and are therefore not actionable. *See* Def. Pfizer's Mem. of Law in Supp. of Mot. for Summ. J. ("Pfizer MSJ") at 38-52; Pfizer's Reply in Supp. of Summ. J. ("Pfizer Reply") at 4-11, 19-20. But, even if plaintiffs could properly raise a question about the accuracy of the disclosures and accrual determinations (which they cannot), their fraud claim against Mr.

Kindler *still fails* because the unrebutted evidence demonstrates that Mr. Kindler acted in good faith reliance on the advice of counsel and other advisors in believing that those disclosures were accurate, complete and in compliance with the securities laws. That unchallenged evidence of good faith reliance precludes the possibility that Mr. Kindler possessed an intent to defraud—whether or not Pfizer's disclosures were accurate. Simply put, plaintiffs cannot overcome summary judgment in the absence of evidence of scienter, of which there is none.

ARGUMENT

I. PLAINTIFFS IDENTIFY NO EVIDENCE THAT MR. KINDLER POSSESSED THE REQUISITE SCIENTER

Mr. Kindler demonstrated in his opening brief that the record contains no evidence to support the element of scienter that is plaintiffs' burden to prove—no testimony by any fact witness that Mr. Kindler ever intended to mislead anyone, no email or document showing that anyone ever suggested to Mr. Kindler that there was a problem with the accuracy of the company's disclosures or accrual determinations and no record of any interference by Mr. Kindler in Pfizer's disclosure processes. *See* Mem. of Law of Def. Jeffrey B. Kindler in Supp. of Summ. J. ("Kindler MSJ") at 18-25. Mr. Kindler's motion challenged plaintiffs to come forward with evidence to the contrary that could stand in the way of summary judgment.[2]

[2] Plaintiffs' opposition asserts that Mr. Kindler has "waive[d]" the argument that plaintiffs' evidence is insufficient to create a triable issue of "actual knowledge or recklessness" and argues only that his scienter is "excused." Pls. Mem. of Law in Opp. to Defs. Summ. J. ("Pls. Opp. MSJ") at 70. That statement is simply wrong. Mr. Kindler's opening brief and Rule 56.1 statement clearly assert that there is no evidence against him that could prove scienter, bad faith or recklessness, not that his conduct is "excused." *See* Kindler MSJ at 18-20; Def. Jeffrey B. Kindler Statement of Undisputed Material Facts Pursuant to Local Rule 56.1 ("Kindler 56.1") at ¶¶ 10, 13, 19. Nor has Mr. Kindler waived any defense or argument by moving for summary judgment.

Plaintiffs fail to meet this challenge. Plaintiffs identify no evidence that supports the unfounded allegation that Mr. Kindler intended to defraud investors or consciously mischaracterized or recklessly disregarded facts. The documents and testimony cited in opposing Mr. Kindler's motion largely pertain to matters *other than* Pfizer's disclosures, and supply no basis to question Mr. Kindler's conduct or intentions. As to Mr. Kindler, this evidence pertains principally to his purported knowledge and awareness as to:

- Pfizer's settlement, prior to the class period, of a government investigation into the marketing of Neurontin;
- the government's investigation into off-label promotion of Bextra and other products;
- conduct by certain Pfizer employees that purportedly constituted off-label promotion;
- certain *qui tam* actions that had been filed against Pfizer; and
- the destruction by particular Pfizer employees of documents relevant to the government's Bextra investigation.

See generally Pls. Opp. MSJ at 97-101; Pls. Statement of Material Facts Requiring Denial of Defs.' Mots. for Summ. J. at ¶¶ 151-192. None of this purported evidence can fill the gap in plaintiffs' proof of scienter on the part of Mr. Kindler. It shows only that Mr. Kindler was aware that Pfizer faced a risk of significant liability from the government's investigation into Bextra—a risk that, as defendants have shown, *was disclosed*. *See* Pfizer MSJ at 11-22, 38-41; Pfizer Reply at 6-7, 30. Mr. Kindler's awareness of Pfizer's experience with Neurontin and of the government's investigation and other matters relating to the marketing of Bextra and other drugs is not evidence that he sought to deceive investors.

When it comes to the disclosures themselves, plaintiffs have nothing meaningful to say. Plaintiffs' response to Mr. Kindler's Rule 56.1 statement identifies only *three* purported issues of fact specific to Mr. Kindler:

- Mr. Kindler's testimony that he did not look to Pfizer's disclosure counsel, Mr. Fox, for advice on the relative strengths of Pfizer's defenses to the government's Bextra investigation in 2006. *See* Pls. Local Rule 56.1 Resp. to Def. Jeffrey B. Kindler's Statement of Undisputed Material Facts ("Pls. Kindler 56.1 Resp.") at 1.

- Minutes from meetings of Pfizer's Disclosure Committee in 2006 that purportedly "demonstrate that the Committee, chaired by Kindler, determined that Kindler should sign the Certification and deliver it" to the then-CEO and CFO. *See id.* at 2.

- Plaintiffs' assertion that Mr. Kindler "was aware that Pfizer suffered from an ineffective regulatory compliance function." *See id.* at 41. In fact, Mr. Kindler was not even an addressee of the email and attachment cited by plaintiffs to support this assertion. *See id.* Ex. 161.

These purported facts create no genuine dispute as to Mr. Kindler's intent. *See* Kindler 56.1 at ¶¶ 10, 13, 19.

Mr. Kindler's opening brief also challenged plaintiffs to point to any evidence of a motive on Mr. Kindler's part to engage in fraud. Kindler MSJ at 1. Plaintiffs' opposition fails to meet this challenge as well. It identifies no reason why Mr. Kindler, first as the General Counsel and then as CEO, would contrive to deceive Pfizer's investors. Plaintiffs have not alleged, and cannot allege, that Mr. Kindler sold Pfizer stock during the class period, because he did not—a fact which courts have recognized tends to disprove scienter. *See, e.g.*, *In re SLM Corp. Sec. Litig.*, 740 F. Supp. 2d 542, 558-59 (S.D.N.Y. 2010) ("[T]he absence of sales by [the defendant] undermines the claim of scienter against him."); *In re N. Telecom Ltd. Sec. Litig.*, 116 F. Supp. 2d 446, 462-63 (S.D.N.Y. 2000) (noting that the absence of "pecuniary gain by company insiders" is "inconsistent with an intent to defraud shareholders"). Why Mr. Kindler

would engage in fraud for the ostensible purpose of inflating the price of Pfizer's stock but *retain* his own shares is a puzzle plaintiffs create but never solve. Their failure to explain a possible motive heightens their burden to demonstrate actual misconduct. *See, e.g.*, *Kalnit v. Eichler*, 264 F.3d 131, 143 (2d Cir. 2001) (holding that plaintiffs who cannot "demonstrate that defendants had a motive to defraud . . . must produce a stronger inference of recklessness"). Here, as already shown, they supply no evidence of misconduct by Mr. Kindler.

II. PLAINTIFFS CANNOT DEMONSTRATE ANY GENUINE ISSUE AS TO MR. KINDLER'S GOOD FAITH RELIANCE ON PFIZER'S PROCESSES FOR ENSURING ACCURATE DISCLOSURE

Independent of their failure to establish scienter, plaintiffs' securities fraud claim against Mr. Kindler fails because, as demonstrated in his opening brief, the unrebutted evidence shows that he relied in good faith on Pfizer's procedures, personnel and experts to ensure that the company's disclosures, including its accrual determinations, were accurate and lawful. *See* Kindler MSJ at 7-17, 20-25.

The unchallenged fact that Mr. Kindler consulted with and followed the advice of legal and accounting professionals is "evidence of good faith, a relevant consideration in evaluating a defendant's scienter." *Howard v. SEC*, 376 F.3d 1136, 1147-49 (D.C. Cir. 2004) (vacating SEC order imposing sanctions against CEO because, *inter alia*, his belief that counsel had approved public offering transaction demonstrated a lack of intent); *see* Kindler MSJ at 22-25. There is no genuine dispute here that Mr. Kindler consulted with counsel—and followed their advice—and there is no evidence that he did not believe that Pfizer's disclosures were accurate, complete and in compliance with the securities laws. This unrebutted evidence of good faith requires summary judgment in his favor.

Plaintiffs do not actually dispute the facts cited by Mr. Kindler as evidence of his good faith reliance on Pfizer's disclosure processes. Instead, plaintiffs' opposition and 44-page response to Mr. Kindler's Rule 56.1 statement argue at length that Lawrence Fox, Dennis Block and KPMG did not possess every item of information known to others within Pfizer. *See generally* Pls. Kindler 56.1 Resp. at 3-41. But, plaintiffs cite no evidence that Mr. Kindler believed or had reason to believe that these individuals did not have all the information they needed to evaluate Pfizer's disclosures and to advise Pfizer regarding those disclosures. And in fact, the undisputed evidence establishes that Mr. Kindler believed that Mr. Fox, Mr. Block and KPMG experts had all the information they needed to make informed disclosures decisions. Indeed, he personally assured himself that Mr. Fox and Mr. Block were adequately informed. *See* Kindler 56.1 at ¶¶ 6, 7. Whether any of these individuals could have (or, in hindsight, should have) known additional information is irrelevant to Mr. Kindler's good faith. On the facts presented here, no jury could conclude that Mr. Kindler had the scienter required for a securities fraud violation.

Plaintiffs mischaracterize Mr. Kindler's position as seeking summary judgment based on an affirmative defense of reliance on counsel, which they argue is not a "complete defense, but only one factor for consideration." Pls. Opp. MSJ at 72 (citing *Markowski v. SEC*, 34 F.3d 99, 104-05 (2d Cir. 1994)). Mr. Kindler's opening brief never invoked an affirmative reliance-on-counsel defense; it argued merely that "he relied in good faith on Pfizer's procedures, personnel and experts to ensure that the company's disclosures were accurate and complied with the securities laws," and that such reliance negates the necessary element of scienter. Kindler MSJ at 20-21.

Markowski, upon which plaintiffs heavily rely, is inapplicable. In that case, there was "substantial evidence" that the defendant Markowski *knew* that his company was violating rules subject to enforcement by the Securities and Exchange Commission. 34 F.3d at 104. That knowledge was fatal to both of Markowski's claimed defenses of reliance on counsel and delegation: his reliance on counsel was not "in good faith," and he had "knowledge or reason to know of non-compliance" by his delegatee. *Id.* at 104-05. Plaintiffs can point to no evidence that Mr. Kindler possessed similar knowledge that would undermine the existence of his good faith—*i.e.*, that he *knew* that Pfizer's disclosures were misleading. As the *Markowski* court recognized, a senior corporate officer "may rely upon the reasonable delegation of particular functions to others, absent knowledge or reason to know of non-compliance by the person to whom the function is delegated." *Id.* at 104. Here, there is no evidence that Mr. Kindler knew of any "non-compliance" by the experienced legal counsel who were charged with ensuring the accuracy of Pfizer's disclosures.

Plaintiffs also dispute that *Steed Finance LDC v. Nomura Securities International, Inc.,* supports Mr. Kindler's argument (Kindler MSJ at 21) that unrebutted evidence of good faith can negate scienter to commit securities fraud. No. 00-CV-8058, 2004 WL 2072536 (S.D.N.Y. Sept. 14, 2004), *aff'd*, 148 F. App'x 66 (2d Cir. 2005). In *Steed*, the plaintiff had offered no evidence of scienter, and the defendant had presented evidence inconsistent with scienter. *See* 148 F. App'x at 69 (concluding that plaintiff "failed to provide sufficient evidence that would enable a jury to conclude that [defendant] had the scienter required"). As in *Steed*, here, the only evidence presented is inconsistent with liability, and Mr. Kindler is therefore entitled to summary judgment.

Plaintiffs have offered no evidence to rebut the unchallenged record of Mr. Kindler's good faith, and plaintiffs' only response to *Howard*, 376 F.3d at 1147-49, *SEC v. Shanahan*, 646 F.3d 536, 544-45 (8th Cir. 2011), *SEC v. Steadman*, 967 F.2d 636, 642-43 (D.C. Cir. 1992), *In re Federal National Mortgage Ass'n Securities, Derivative, & "ERISA" Litigation (In re Fannie Mae Securities Litigation)*, 892 F. Supp. 2d 59, 72 (D.D.C. 2012), and *North Port Firefighters' Pension–Local Option Plan v. Temple-Inland, Inc.*, 936 F. Supp. 2d 722, 754-55 (N.D. Tex. 2013), which Mr. Kindler cited in his opening brief, is to note that they are decisions from other circuits and do not stand for the proposition that reliance is a complete defense. Pls. Opp. MSJ at 75-79. But, plaintiffs point to no Second Circuit cases that are contrary to these decisions or inconsistent with the argument that the unchallenged record of Mr. Kindler's good faith reliance on Pfizer's procedures, personnel and experts negates scienter.

Plaintiffs attempt to distinguish *In re REMEC Inc. Securities Litigation*, 702 F. Supp. 2d 1202, 1241 (S.D. Cal. 2010), cited by Mr. Kindler (Kindler MSJ at 21, 23-24), on the grounds that Mr. Kindler and the other Pfizer defendants had a "reason to believe" and "actual knowledge" that Pfizer had "committed the misbranding crime that was the subject of the Bextra investigation." Pls. Opp. MSJ at 76. The critical question in this securities fraud case, however, is whether Mr. Kindler had "reason to believe" or "actual knowledge" that Pfizer's *disclosures* were false or misleading. Again, plaintiffs have presented no evidence suggesting that Mr. Kindler intended to deceive Pfizer's investors or that his reliance on others was other than in good faith.

III. MR. KINDLER IS ENTITLED TO SUMMARY JUDGMENT ON PLAINTIFFS' CLAIM UNDER SECTION 20(A)

Plaintiffs have not raised a genuine issue of material fact that a primary violation of Section 10(b) occurred by someone controlled by Mr. Kindler. Nor have they pointed to an issue of material fact that Mr. Kindler was a culpable participant in the alleged fraudulent conduct. To the contrary, for all the reasons discussed above, the undisputed record demonstrates that Mr. Kindler exercised diligence and acted in good faith in making the alleged statements at issue. Accordingly, Mr. Kindler is entitled to summary judgment on plaintiffs' Section 20(a) claim.

CONCLUSION

For the foregoing reasons, Mr. Kindler respectfully requests that the Court grant his motion for summary judgment.

Dated: December 8, 2014

Respectfully submitted,

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