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December 9, 2014

VIA ECF AND HAND DELIVERY

Honorable Alvin K. Hellerstein
United States District Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1050
New York, NY 10007-1312

Re: Mary K. Jones v. Pfizer Inc., et al., Index No. 10-cv-03864 (AKH)

Dear Judge Hellerstein:

As counsel to defendant Ian C. Read, the present CEO of Pfizer, we write to advise the Court that Mr. Read's summary judgment motion is now fully briefed and submitted, and to respectfully request that the Court set a date for oral argument on his motion.

We assure the Court that we appreciate the Court's busy docket and limited availability over the next several weeks, and that we do not make this request lightly. We do believe, however, that Mr. Read (who was not the CEO at the time of the events in question) has a summary judgment motion supported by clear Supreme Court and Second Circuit case law which, if granted, will free him from this case so that he can continue his responsibilities in managing the business of Pfizer, as opposed to spending substantial time over the next six weeks preparing for trial.

We thank the Court in advance for Your Honor's consideration of this request.

Respectfully submitted,



Sheila Birnbaum
Michael B. Carlinsky

cc: Counsel of Record (via e-mail and ECF)

Derek Pickern

From: NYSD_ECF_Pool@nysd.uscourts.gov
Sent: Tuesday, December 09, 2014 8:26 AM
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U.S. District Court

Southern District of New York

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Case Name: Jones et al v. Pfizer, Inc. et al
Case Number: [1:10-cv-03864-AKH](#)
Filer: Ian C. Read
Document Number: [336](#)

Docket Text:

LETTER addressed to Judge Alvin K. Hellerstein from Sheila Birnbaum dated 12.9.14 re: Ian C. Reads Motion for Summary Judgment. Document filed by Ian C. Read.(Birnbaum, Sheila)

1:10-cv-03864-AKH Notice has been electronically mailed to:

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