

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARY K. JONES, Individually and on Behalf of All Others Similarly Situated,	:	Civil Action No. 1:10-cv-03864-AKH
	:	
Plaintiff	:	<u>CLASS ACTION</u>
	:	
vs.	:	DECLARATION OF JASON A. FORGE IN SUPPORT OF PLAINTIFFS' MOTION TO EXCLUDE RELIANCE EVIDENCE AND ARGUMENT
PFIZER INC., et al.,	:	
	:	
Defendants.	:	
	:	

I, JASON A. FORGE, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of the State of California and am admitted *pro hac vice* before this court. I am a member of the law firm of Robbins Geller Rudman & Dowd LLP, Lead Counsel for plaintiffs in the above-entitled action. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached is a true and correct copy of the following exhibit:

Exhibit 1: Defendants' Joint Witness List, dated December 5, 2014.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 10th day of December, 2014, at San Diego, California.

s/ JASON A. FORGE

JASON A. FORGE

CERTIFICATE OF SERVICE

I hereby certify that on December 10, 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 December 10, 2014.

s/ JASON A. FORGE

JASON A. FORGE

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EXHIBIT 1

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

DEFENDANTS' JOINT WITNESS LIST

Pursuant to Federal Rule of Civil Procedure 26(a)(3), Defendants hereby identify the following individuals whom they intend to call as witnesses at trial. Defendants reserve the right to modify, supplement and narrow this Witness List, including but not limited to amending the list to respond to any issues, exhibits, witnesses, or deposition designations identified or presented by Plaintiffs. If any witness listed below is unavailable, Defendants reserve the right to offer deposition testimony from such witness. Defendants further reserve the right to call (i) any witness listed on Plaintiffs' witness list, and (ii) additional witnesses not listed herein to offer testimony in rebuttal to evidence submitted by Plaintiffs. The listing of individuals on this Witness List does not waive any objection Defendants may have to the testimony of such individuals that Plaintiffs may seek to introduce at trial, either live or by deposition designation.

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3. James Bristow
4. Richard Burch

5. Loretta Cangialosi
6. John Chapman
7. Frank D'Amelio
8. Hugh Donnelly
9. Lawrence Fox
10. Jake Friedman
11. Gary Giampetruzzi
12. Dan Hanson
13. Timothy Hedley
14. Mary Jones
15. Jeffrey Kindler
16. Douglas Lankler
17. Alan Levin
18. Henry McKinnell
19. Charles Mooney
20. Brien O'Connor
21. Roger Otten
22. Ethan Posner
23. Ian Read
24. Eric Riso
25. Chuck Triano
26. Allen Waxman
27. Carlton Wessel

- 28. John Coates
- 29. David Feigal
- 30. William Holder
- 31. Ken Lehn
- 32. Sean Nicholson
- 33. Sunil Panchal
- 34. Jack Tanselle
- 35. Nick Theodorou

Dated: December 5, 2014

Respectfully submitted,

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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: Mary K. Jones
Stichting Philips Pensioenfonds

Document Number: [348](#)

Docket Text:

DECLARATION of Jason A. Forge in Support re: [343] MOTION in Limine to Exclude Reliance Evidence and Argument.. Document filed by Mary K. Jones(Individually), Stichting Philips Pensioenfonds. (Attachments: # (1) Exhibit 1)(Forge, Jason)

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