

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

ECF Case

**NOTICE OF DEFENDANTS' MOTION *IN LIMINE* NO. 4  
TO EXCLUDE ARGUMENT AND EVIDENCE RELATED TO  
FORMER EMPLOYEES' DELETION OF ELECTRONIC DOCUMENTS**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum in Support of Defendants' Motion *In Limine* No. 4 To Exclude Argument and Evidence Related to Former Employees' Deletion of Electronic Documents, the December 10, 2014 Declaration of Amanda M. MacDonald in Support of Defendants' Motions *In Limine*, and Exhibits annexed thereto, and all prior pleadings, submissions and proceedings had herein, Defendants Pfizer Inc., Ian C. Read, Allen Waxman, Alan G. Levin, Frank D'Amelio, Jeffrey B. Kindler, and Henry A. McKinnell 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, pursuant to Federal Rules of Evidence 401, 402, 403, and 404, excluding evidence related to former Pfizer employees' deletion of documents. Defendants respectfully request oral argument on all of their *in limine* motions.

Date: December 10, 2014  
Washington, D.C.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that, on this 10th day of December, 2014, the foregoing Notice of Defendants' Motion *in Limine* No. 4 to Exclude Argument and Evidence Related to Former Employees' Deletion of Electronic Documents was filed with the Court through the CM/ECF system and thereby served to all parties of record.

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**U.S. District Court**

**Southern District of New York**

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**Filer:** Frank D'Amelio  
Jeffrey B. Kindler  
Alan G. Levin  
Henry A. McKinnell  
Pfizer, Inc.  
Ian C. Read  
Allen Waxman

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**Docket Text:**

***MOTION in Limine No. 4 To Exclude Argument and Evidence Related to Former Employees' Deletion of Electronic Documents.*** Document filed by Frank D'Amelio, Jeffrey B. Kindler, Alan G. Levin, Henry A. McKinnell, Pfizer, Inc., Ian C. Read, Allen Waxman.(Collogan, Lauren)

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