

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 MOTION *IN LIMINE* NO. 11 TO PRECLUDE EVIDENCE OR
TESTIMONY IN CONNECTION WITH CERTAIN STATEMENTS THAT ARE NOT
ACTIONABLE AS A MATTER OF LAW**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum in Support of Defendants' Motion *In Limine* No. 11 to Preclude Evidence or Testimony in Connection With Certain Statements that are Not Actionable as a Matter of Law, 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 applicable law, precluding Plaintiffs from advancing as a basis for any Defendant's liability evidence or testimony in connection with certain allegedly false or misleading statements that are inactionable as a matter of law, statements Plaintiffs have

indicated they intend to present at trial. Defendants respectfully request oral argument on all of their *in limine* motions.

Date: December 10, 2014
Washington, DC

Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that, on this 10th day of December, 2014, the foregoing Notice of Motion *In Limine* No. 11 to Preclude Evidence or Testimony in Connection With Certain Statements that are Not Actionable as a Matter of Law 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

Document Number: [370](#)

Docket Text:

MOTION in Limine No. 11 To Preclude Evidence or Testimony In Connection with Certain Statements that Are Not Actionable As a Matter of Law. 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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