UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARY K. JONES, Individually and on Behalf of All Others Similarly Situated, Plaintiff vs. PFIZER INC., et al., Defendants.	Civil Action No. 1:10-cv-03864-AKH CLASS ACTION PLAINTIFFS' REPLY TO DEFENDANTS' MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFFS' MISCELLANEOUS MOTIONS *IN LIMINE*

Plaintiffs' miscellaneous motions *in limine* were filed with the intention of allowing the parties and the Court to address certain pretrial and trial procedures in advance of the January 26, 2015 trial date. Plaintiffs believe that addressing these issues at the January 6, 2015 Pretrial Conference will allow the Court to avoid dealing with these issues during the trial.

I. Both Sides (Plaintiffs Combined and Defendants Combined) Should Be Allotted the Same Number of Peremptory Challenges

Plaintiffs asked the Court to grant both sides an equal number of peremptory challenges. In response, defendants claim that they are entitled to more peremptory challenges than plaintiffs. Defendants argue that they are represented by separate counsel and have differing interests given their various dates of employment and plaintiffs' theories of liability. Defendants apparently have a short memory and lack an understanding of plaintiffs' case.

Plaintiffs' initial complaint was filed on May 11, 2010. Dkt. No. 1. During the next four and a half years, Pfizer and all six Individual Defendants were represented by the same law firms.[1] Williams & Connolly also represented over a dozen current and former Pfizer executives or Pfizer agents who were deposed in this case. Although the Individual Defendants recently added trial counsel, the stark reality is that the same law firm represented all seven defendants throughout this case – because the defendants' interests are identical. For that reason alone, defendants should share their peremptory challenges.

Defendants cite to Judge Haight's opinion in *LNC Investments, Inc. v. First Fidelity Bank*, No. 92 Civ. 7584 (CSH), 2000 U.S. Dist. LEXIS 11131 (S.D.N.Y. Aug. 8, 2000) in support of their

[1] Cadwalader Wickersham & Taft represented all seven defendants until November 3, 2011. Dkt. Nos. 96 and 97. Cahill Gordon & Reindel joined Cadwalader as co-counsel for all defendants in April 2011 and was ultimately replaced by Williams & Connolly in August 2012.

request for additional peremptory challenges. Defendants quote extensively from the *LNC* opinion, but omit the following passage:

> Each case depends on its circumstances. Where, as here, "several defendants" ask for additional challenges, the ***issue frequently turns upon whether the defendants' interests are adverse to each other, as in the case of cross-claims. Generally it is thought fair to give defendants at war with each other***, as well as with the plaintiff, an additional challenge or challenges so that individual interests may be protected. But this is not such a case.

LNC, 2000 U.S. Dist. LEXIS 11311, at *4-*5.[2]

Pfizer and the Individual Defendants' interests are not adverse to each other and there are no cross-claims. Defendants present a unified front, submitting joint motions *in limine*, a joint opposition to plaintiffs' motion for partial summary judgment on their reliance defenses, joint affirmative motions *in limine* and a joint reply to plaintiffs' opposition to defendants' various, overlapping motions for summary judgment. Defendants chose to use the same attorneys throughout four and half years of litigation; they chose to have their lawyers represent every current and virtually every former Pfizer employee; and they chose to file motions jointly throughout the case. Defendants are not at war with each other; they are only at war with plaintiffs. Defendants' request for more peremptory challenges than plaintiffs should be rejected out of hand.

Defendants' argument that plaintiffs have different theories of liability is also absurd. Plaintiffs will prove that defendants' shocking announcement on January 26, 2009 that they had entered into an agreement in principle with the government to pay a $2.3 billion fine in connection with Pfizer's off-label promotion of pharmaceutical products caused the class to endure a massive loss. The announcement demonstrated that Pfizer and each of the Individual Defendants had engaged in a massive fraud for three years to cover up their crimes. The fact that McKinnell only

[2] Unless otherwise noted, emphasis is added and citations are omitted.

made false and misleading statements until his departure from the Company and D'Amelio only made false and misleading statements after he signed on as CFO in 2007 does not translate to different theories of liability. Plaintiffs' theory of liability is the same as to all defendants: defendants made false and misleading statements with respect to the government investigation and Pfizer's off-label promotion of pharmaceutical products for years.

Defendants' request for additional peremptory challenges should be denied.

II. Plaintiffs Should Be Permitted to Examine Witnesses Identified with Defendants Through the Use of Leading Questions

Plaintiffs asked the Court for an order permitting plaintiffs to examine defendants and witnesses identified with defendants through the use of leading questions. Plaintiffs and defendants recently reached an understanding on the use of leading questions with respect to current and former Pfizer employees and Brien O'Connor (assuming he appears at trial). However, the parties have failed to reach an agreement with respect to three witnesses: Pfizer's attorney, Dennis Block, and two KPMG partners who audited Pfizer's financial statements during the Class Period, Larry Bradley and John Chapman. These three witnesses are identified with defendants.

Mr. Block was Pfizer's lawyer throughout the Class Period. Defendants intend to call him in their case-in-chief. Moreover, not only did Mr. Block represent Pfizer during the Class Period – he represented all defendants ***in this case***. Cadwalader Wickersham & Taft was counsel to defendants from the time the complaint was filed until November 2011. Mr. Block was counsel of record for defendants. *See, e.g.*, Dkt. Nos. 77, 96. He is clearly identified with defendants.

Similarly, KPMG was Pfizer's auditor during the Class Period and remains Pfizer's auditor now. The two KPMG witnesses, Mr. Bradley and Mr. Chapman, remain KPMG partners. Over the past decade, KPMG has earned over $316 million from its work – audit and otherwise – for Pfizer.

Dkt. No. 303, ¶461. Clearly KPMG is identified with defendants. The Court should permit plaintiffs to examine both Block and the KPMG partners by leading questions.

III. Defendants Should Make Witnesses Available for Plaintiffs' Case-in-Chief

Plaintiffs' request was a simple one: if defendants can get a witness to court for themselves, they should also make that witness available, on request, for plaintiffs' case-in-chief. Plaintiffs should not have to play deposition testimony of a witness for the jurors, only to have defendants magically produce the same witness in their case. It appears that the parties have reached an understanding on this issue. Plaintiffs will renew the motion if there are any disagreements down the road.

IV. Exclusion of Witnesses from the Courtroom

It appears that defendants agree that, with the exception of the parties and expert witnesses, witnesses should be excluded from the courtroom during the trial. It also appears that defendants agree that, with the exception of parties and experts, witnesses will be precluded from discussing the evidence at trial with other witnesses until the trial is completed.

V. Counsel's Communications with Witnesses During Their Testimony

Defendants assert that they and apparently all of the other Pfizer witnesses represented by defense counsel should be permitted to discuss their ongoing testimony with defense counsel during breaks in their testimony. Defendants rely on *Morgan v. Bennett*, 204 F.3d 360, 365-369 (2d Cir. 2000). *Morgan* is a criminal case in which the accused appealed the denial of his habeas petition on the grounds, *inter alia*, that his attorney was ordered by the court not to tell the accused that a witness would be testifying against him the next day at trial. The Second Circuit, in light of the limited prohibition and a real concern for witness safety, rejected the argument. Therefore, *Morgan* does not support defendants' position. In doing so, the court discussed cases such as *Perry v. Leeke*,

488 U.S. 272 (1989) and *Geders v. United States*, 425 U.S. 80 (1976), which considered restrictions on witness coaching or "tailoring of testimony" during recesses in the middle of a witness's testimony. *Morgan*, 204 F.3d at 366. *Morgan* noted that "[i]n light of an accused's Sixth Amendment right to counsel," there had to be limitations on precluding the accused from speaking with his attorney. *Id.*

However, this Sixth Amendment analysis has no application to this civil case.[3] And, even in criminal cases, such orders have been upheld. *See, e.g.*, *Perry*, 488 U.S. at 282. Neither plaintiffs nor defendants should be permitted to coach witnesses during breaks in the witness's testimony.

VI. Weekly Summations

Plaintiffs submit that interim summations will be helpful in this securities trial. This trial will involve concepts and circumstances that may be unfamiliar to many jurors. For example, concepts such as SEC filings, doctor "detailing," FDA-approved indications for drugs and event studies – among many other issues – will require explanation and reinforcement. Plaintiffs ask the Court to consider their request for short interim summations designed to assist the jurors in following the testimony.

VII. Preliminary Jury Questionnaire

Plaintiffs forwarded a proposed jury questionnaire to defendants on December 16, 2014. The parties will meet-and-confer with respect to the questionnaire during the week of December 29.

[3] Defendants rely on *Potashnick v. Port City Construction Co.*, 609 F.2d 1101 (5th Cir. 1980) in which the court held that the trial court's ruling that a party could not consult with his attorney impinged on the litigant's due process right to counsel. First, *Potashnick* is irrelevant as to non-parties, such as former and current Pfizer executives and employees. Second, in *Potashnick*, the order precluded a party from speaking with his attorney for a seven-day period. This Court could certainly craft a less harsh order in this case if the prohibition were to cause any lengthy delay in communication between a party and their attorney.

Plaintiffs will advise the Court as soon as possible if an agreement on the contents of a jury questionnaire is reached by the parties.

VIII. Preliminary Jury Instructions

Plaintiffs sent their proposed jury instructions to defendants on December 15, 2014. Plaintiffs included preliminary instructions, which plaintiffs propose be read to the jury before opening statements. The parties will meet-and-confer on the issue in advance of the January 6, 2015 Pretrial Conference in an effort to provide the Court with a joint proposed set of preliminary instructions.

IX. Conclusion

Plaintiffs ask that, where opposed by defendants, plaintiffs' miscellaneous motions *in limine* be granted.

DATED: December 30, 2014

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
MICHAEL J. DOWD
HENRY ROSEN
TRIG R. SMITH
JASON A. FORGE
RYAN A. LLORENS
IVY T. NGO

s/ MICHAEL J. DOWD
MICHAEL J. DOWD

655 West Broadway, Suite 1900
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
miked@rgrdlaw.com
henryr@rgrdlaw.com
trigs@rgrdlaw.com
jforge@rgrdlaw.com
ryanl@rgrdlaw.com
ingo@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
WILLOW E. RADCLIFFE
DANIEL J. PFEFFERBAUM
MATTHEW S. MELAMED
Post Montgomery Center
One Montgomery Street, Suite 1800
San Francisco, CA 94104
Telephone: 415/288-4545
415/288-4534 (fax)
willowr@rgrdlaw.com
dpfefferbaum@rgrdlaw.com
mmelamed@rgrdlaw.com

Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on December 30, 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 30, 2014.

s/ MICHAEL J. DOWD
MICHAEL J. DOWD

ROBBINS GELLER RUDMAN
& DOWD LLP
655 West Broadway, Suite 1900
San Diego, CA 92101-8498
Telephone: 619/231-1058
619/231-7423 (fax)

E-mail: MikeD@rgrdlaw.com

Mailing Information for a Case 1:10-cv-03864-AKH

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Michael Scott Bailey**
  michael.bailey@skadden.com
- **Sidney Bashago**
  sidney.bashago@dpw.com,jennifer.kan@davispolk.com,ecf.ct.papers@davispolk.com
- **Sheila L. Birnbaum**
  sheilabirnbaum@quinnemanuel.com
- **George Anthony Borden**
  gborden@wc.com
- **Kevin Anthony Burke**
  kaburke@sidley.com,nyefiling@sidley.com,efilingnotice@sidley.com
- **Michael Barry Carlinsky**
  michaelcarlinsky@quinnemanuel.com,brantkuehn@quinnemanuel.com,jomairecrawford@quinnemanuel.com
- **Lauren Kristina Collogan**
  lcollogan@wc.com
- **Keir Nicholas Dougall**
  kdougall@dougallpc.com
- **Michael Joseph Dowd**
  miked@rgrdlaw.com,e_file_sd@rgrdlaw.com,tome@rgrdlaw.com,e_file_sf@rgrdlaw.com
- **Alexander C Drylewski**
  alexander.drylewski@skadden.com
- **Charles S. Duggan**
  charles.duggan@dpw.com,ecf.ct.papers@davispolk.com
- **Steven M.. Farina**
  sfarina@wc.com
- **Jason A. Forge**
  jforge@rgrdlaw.com,tholindrake@rgrdlaw.com,e_file_SD@rgrdlaw.com
- **Ross Bradley Galin**
  rgalin@omm.com,mochoa@omm.com,neverhart@omm.com,lisachen@omm.com
- **Gary John Hacker**
  ghacker@skadden.com
- **James R. Harper**
  coljamesrharper@me.com
- **Howard E. Heiss**
  hheiss@omm.com,#nymanagingattorney@omm.com
- **Paul T. Hourihan**
  phourihan@wc.com
- **James M. Hughes**
  jhughes@motleyrice.com,kweil@pacernotice.com,mgruetzmacher@motleyrice.com,erichards@motleyrice.com,kweil@motleyrice.com
- **Jay B. Kasner**
  jkasner@skadden.com
- **Joe Kendall**
  administrator@kendalllawgroup.com,jkendall@kendalllawgroup.com,hlindley@kendalllawgroup.com

- **Brant Duncan Kuehn**
  brantkuehn@quinnemanuel.com
- **Leigh R. Lasky**
  lasky@laskyrifkind.com
- **Hamilton Philip Lindley**
  hlindley@deanslyons.com,mgoens@deanslyons.com
- **Ryan A. Llorens**
  ryanl@rgrdlaw.com,nbear@rgrdlaw.com,kirstenb@rgrdlaw.com
- **Amanda M. MacDonald**
  amacdonald@wc.com
- **Lori McGill**
  lorialvinomcgill@quinnemanuel.com
- **Matthew Melamed**
  mmelamed@rgrdlaw.com
- **Donald Alan Migliori**
  dmigliori@motleyrice.com
- **Eugene Mikolajczyk**
  genem@rgrdlaw.com
- **Seema Mittal**
  smittal@wc.com
- **Cynthia Margaret Monaco**
  cmonaco@cynthiamonacolaw.com,cmmonaco@gmail.com
- **Juliana Newcomb Murray**
  juliana.murray@davispolk.com,lisa.hirakawa@davispolk.com,ecf.ct.papers@davispolk.com
- **Scott D. Musoff**
  smusoff@skadden.com
- **Danielle Suzanne Myers**
  dmyers@rgrdlaw.com
- **William H. Narwold**
  bnarwold@motleyrice.com,vlepine@motleyrice.com,ajanelle@motleyrice.com
- **Ivy T. Ngo**
  ingo@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Joseph G. Petrosinelli**
  jpetrosinelli@wc.com
- **Willow E. Radcliffe**
  willowr@rgrdlaw.com,ptiffith@rgrdlaw.com
- **Joseph F. Rice**
  jrice@motleyrice.com
- **Darren J. Robbins**
  e_file_sd@rgrdlaw.com
- **Daniel Prugh Roeser**
  droeser@goodwinprocter.com
- **Henry Rosen**
  henryr@rgrdlaw.com,dianah@rgrdlaw.com
- **David Avi Rosenfeld**
  drosenfeld@rgrdlaw.com,e_file_ny@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **James P. Rouhandeh**
  james.rouhandeh@dpw.com,ecf.ct.papers@davispolk.com

- **Samuel Howard Rudman**
  srudman@rgrdlaw.com,e_file_ny@rgrdlaw.com,mblasy@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Stuart Michael Sarnoff**
  ssarnoff@omm.com
- **William E. Schurmann**
  wschurmann@wc.com
- **Trig Randall Smith**
  trigs@rgrdlaw.com,e_file_sd@rgrdlaw.com,nhorstman@rgrdlaw.com
- **Jennifer Lynn Spaziano**
  jen.spaziano@skadden.com
- **Richard Mark Strassberg**
  rstrassberg@goodwinprocter.com,nymanagingclerk@goodwinprocter.com
- **Mitchell M.Z. Twersky**
  mtwersky@aftlaw.com
- **John K. Villa**
  jvilla@wc.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Daniel E. Hill
Kendall Law Group, LLP
3232 McKinney Avenue
Suite 700
Dallas, TX 75204

Catherine J. Kowalewski
Robbins Geller Rudman & Dowd LLP (San Diego)
655 West Broadway
Suite 1900
San Diego, CA 92101

Jamie J. McKey
Kendall Law Group, LLP
3232 McKinney Avenue
Suite 700
Dallas, TX 75204

David C. Walton
Robbins Geller Rudman & Dowd LLP (SANDIEGO)
655 West Broadway
Suite 1900
San Diego, CA 92101

Regan Karstrand

From: NYSD_ECF_Pool@nysd.uscourts.gov
Sent: Tuesday, December 30, 2014 1:38 PM
To: CourtMail@nysd.uscourts.gov
Subject: Activity in Case 1:10-cv-03864-AKH Jones et al v. Pfizer, Inc. et al Reply to Response to Motion

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.
*****NOTE TO PUBLIC ACCESS USERS*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.**

U.S. District Court

Southern District of New York

Notice of Electronic Filing

The following transaction was entered by Dowd, Michael on 12/30/2014 at 1:38 PM EST and filed on 12/30/2014

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: 423

Docket Text:
REPLY to Response to Motion re: [337] MOTION in Limine *Plaintiffs' Miscellaneous Motions in Limine*. . Document filed by Mary K. Jones(Individually), Stichting Philips Pensioenfonds. (Dowd, Michael)

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

Alexander C Drylewski alexander.drylewski@skadden.com

Amanda M. MacDonald amacdonald@wc.com

Brant Duncan Kuehn brantkuehn@quinnemanuel.com

Charles S. Duggan charles.duggan@dpw.com, ecf.ct.papers@davispolk.com

Cynthia Margaret Monaco cmonaco@cynthiamonacolaw.com, cmmonaco@gmail.com

Daniel Prugh Roeser droeser@goodwinprocter.com

Danielle Suzanne Myers dmyers@rgrdlaw.com

Darren J. Robbins e_file_sd@rgrdlaw.com

David Avi Rosenfeld drosenfeld@rgrdlaw.com, e_file_ny@rgrdlaw.com, e_file_sd@rgrdlaw.com

Donald Alan Migliori dmigliori@motleyrice.com

Eugene Mikolajczyk genem@rgrdlaw.com

Gary John Hacker ghacker@skadden.com

George Anthony Borden gborden@wc.com

Hamilton Philip Lindley hlindley@deanslyons.com, mgoens@deanslyons.com

Henry Rosen henryr@rgrdlaw.com, dianah@rgrdlaw.com

Howard E. Heiss hheiss@omm.com, #nymanagingattorney@omm.com

Ivy T. Ngo ingo@rgrdlaw.com, e_file_sd@rgrdlaw.com

James M. Hughes jhughes@motleyrice.com, erichards@motleyrice.com, kweil@motleyrice.com, kweil@pacernotice.com, mgruetzmacher@motleyrice.com

James P. Rouhandeh james.rouhandeh@dpw.com, ecf.ct.papers@davispolk.com

James R. Harper coljamesrharper@me.com

Jason A. Forge jforge@rgrdlaw.com, e_file_SD@rgrdlaw.com, tholindrake@rgrdlaw.com

Jay B. Kasner jkasner@skadden.com

Jennifer Lynn Spaziano jen.spaziano@skadden.com

Joe Kendall administrator@kendalllawgroup.com, hlindley@kendalllawgroup.com, jkendall@kendalllawgroup.com

John K. Villa jvilla@wc.com

Joseph F. Rice jrice@motleyrice.com

Joseph G. Petrosinelli jpetrosinelli@wc.com

Juliana Newcomb Murray juliana.murray@davispolk.com, ecf.ct.papers@davispolk.com, lisa.hirakawa@davispolk.com

Keir Nicholas Dougall kdougall@dougallpc.com

Kevin Anthony Burke kaburke@sidley.com, efilingnotice@sidley.com, nyefiling@sidley.com

Lauren Kristina Collogan lcollogan@wc.com

Leigh R. Lasky lasky@laskyrifkind.com

Lori McGill lorialvinomcgill@quinnemanuel.com

Matthew Melamed mmelamed@rgrdlaw.com

Michael Barry Carlinsky michaelcarlinsky@quinnemanuel.com, brantkuehn@quinnemanuel.com, jomairecrawford@quinnemanuel.com

Michael Joseph Dowd miked@rgrdlaw.com, e_file_sd@rgrdlaw.com, e_file_sf@rgrdlaw.com, tome@rgrdlaw.com

Michael Scott Bailey michael.bailey@skadden.com

Mitchell M.Z. Twersky mtwersky@aftlaw.com

Paul T. Hourihan phourihan@wc.com

Richard Mark Strassberg rstrassberg@goodwinprocter.com, nymanagingclerk@goodwinprocter.com

Ross Bradley Galin rgalin@omm.com, lisachen@omm.com, mochoa@omm.com, neverhart@omm.com

Ryan A. Llorens ryanl@rgrdlaw.com, kirstenb@rgrdlaw.com, nbear@rgrdlaw.com

Samuel Howard Rudman srudman@rgrdlaw.com, e_file_ny@rgrdlaw.com, e_file_sd@rgrdlaw.com, mblasy@rgrdlaw.com

Scott D. Musoff smusoff@skadden.com

Seema Mittal smittal@wc.com

Sheila L. Birnbaum sheilabirnbaum@quinnemanuel.com

Sidney Bashago sidney.bashago@dpw.com, ecf.ct.papers@davispolk.com, jennifer.kan@davispolk.com

Steven M.. Farina sfarina@wc.com

Stuart Michael Sarnoff ssarnoff@omm.com

Trig Randall Smith trigs@rgrdlaw.com, e_file_sd@rgrdlaw.com, nhorstman@rgrdlaw.com

William E. Schurmann wschurmann@wc.com

William H. Narwold bnarwold@motleyrice.com, ajanelle@motleyrice.com, vlepine@motleyrice.com

Willow E. Radcliffe willowr@rgrdlaw.com, ptiffith@rgrdlaw.com

1:10-cv-03864-AKH Notice has been delivered by other means to:

Catherine J. Kowalewski
Robbins Geller Rudman & Dowd LLP (San Diego)
655 West Broadway
Suite 1900
San Diego, CA 92101

Daniel E. Hill
Kendall Law Group, LLP
3232 McKinney Avenue
Suite 700
Dallas, TX 75204

David C. Walton
Robbins Geller Rudman & Dowd LLP (SANDIEGO)
655 West Broadway
Suite 1900
San Diego, CA 92101

Jamie J. McKey
Kendall Law Group, LLP
3232 McKinney Avenue
Suite 700
Dallas, TX 75204

The following document(s) are associated with this transaction:

Document description: Main Document
Original filename:n/a
Electronic document Stamp:
[STAMP dcecfStamp_ID=1008691343 [Date=12/30/2014] [FileNumber=14061422
-0] [353bfadbb86eea2765ef64d37d6257a133eea4a1834bd48d46c15fb2c37089e42
50b0a39b90a6ae3fff026db8879c7042a2440e63e66cb168bb348175ab53d5f]]