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 MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION *IN LIMINE* TO PRECLUDE OPINION TESTIMONY BY FACT WITNESSES

I. INTRODUCTION

Defendants concede that they did not disclose any of their fact witnesses as expert witnesses under Federal Rule of Civil Procedure 26(a)(2). They also do not contest Federal Rule of Evidence 701's limitation on opinion testimony. Rather, defendants exclaim that they should somehow be exempt from the disclosure requirements of the Federal Rules of Civil Procedure and the Federal Rules of Evidence in presenting expert testimony to support their good-faith defense because their opinions are "relevant" to these defenses. No such exemptions are permissible. Defendants cannot rely on their "disclosure experts" that they failed to timely disclose as experts under Rule 26(a)(2) by the April 25, 2014 deadline for such disclosures. *See* Memorandum of Law in Support of Plaintiffs' Motion *in Limine* to Preclude Opinion Testimony by Fact Witnesses (Dkt. No. 382) at 2. Moreover, their efforts to characterize the opinions of their undisclosed expert witnesses as based on "first-hand" or "personal" knowledge cannot be reconciled with defendants' blatant reliance on these witnesses as experts in their summary judgment papers and the inadmissible opinion testimony they seek to illicit from them at trial. Having failed to disclose these witnesses as experts under Rule 26(a)(2), defendants should be precluded from offering their expert opinions. Fed. R. Civ. P. 37(c)(1).

II. ARGUMENT

The testimony defendants seek to offer at trial is classic opinion testimony cloaked in an aura of expertise. Defendants themselves repeatedly refer, for example, to Fox and Block as "experts" in their summary judgment papers and KPMG LLP (*i.e.*, audit partner Larry Bradley) as an expert advisor. *See, e.g.*, Dkt. No. 258 (Waxman) at 1 ("disclosure experts"); *id.* at 5 (Block and Fox's "expertise and experience counseling on securities disclosures."); Dkt. No. 274 (Kindler) at 3

(looked to "Pfizer's expert personnel and advisors," including Dennis Block and KPMG LLP).[1] Having repeatedly touted the expertise of these witnesses, defendants' claim in opposition to the instant motion that they are not relying on improper opinion testimony of these witnesses rings hollow.

Further, a review of the exemplars of opinion testimony referenced in plaintiffs' moving papers and defendants' continued insistence that such testimony is proper, underscores the reasons why defendants should be barred from offering improper opinion testimony at trial. Indeed, the testimony defendants seek to illicit at trial from witnesses is impermissibly "rooted in their expertise." For example, Larry Fox's opinion as to what would be "in the mind of any reasonable investor" is not tethered to any first-hand knowledge. Dkt. No. 382 at 2. Likewise, his testimony that "we concluded that the disclosures that were already in our SEC reports fully complied with the securities laws" is not based on his personal knowledge. *Id.* While defendants claim that Fox "personally concluded" that the disclosures were in compliance, his actual testimony references the collective "we," which is precisely the type of opinion testimony that the Second Circuit found impermissible in *United States v. Garcia*, 413 F.3d 201, 215 (2d. Cir. 2005) (testimony based on collective knowledge of an investigation inadmissible under Rule 701). *See* Dkt. No. 401 at 2. None of defendants' lawyers or accounting witnesses should be able to testify as to their opinions that are not based on their personal investigations or knowledge. *Bank of China v. NBM LLC*, 359 F.3d 171,

[1] *See also* Dkt. No. 246 (Pfizer) at 33 ("The legal advice Pfizer received from its lawyers [Block and Fox], who are experts in this field . . . .); Dkt. No. 263 (D'Amelio) at 27 (referencing defendant D'Amelio's testimony regarding his reliance on the expertise of Dennis Block and Larry Fox); *id.* at 27 ("'Dennis is a securities lawyer expert'"); Dkt. No. 253 (Levin) at Preliminary Statement (relied on expertise of in-house and outside counsel, Fox and Block); *id.* at 11 (Dennis Block is a "recognized expert in the area of securities law" and Fox had "40 years of legal experience.").

181-82 (2d Cir. 2004) (error to allow an employee's testimony that was not the product of his personal investigation, but rather his specialized knowledge in banking).

Defendants do not even attempt to address Fox's primer on securities law disclosure requirements as it is clearly based on his "specialized knowledge within the scope of Rule 702." Fed. R. Evid. 701. This includes his opinion that "I do not think that there was any obligation under the securities laws to say off-label promotion." Dkt. No. 383, Ex. 2 at 152:1-3. Followed by his expert opinions that there is "no obligation in the securities laws to disclose a target letter" or that "we do what is required by the federal securities laws." *Id.* at 138:16-17, 128:19-21. Not even properly disclosed experts are allowed to offer such testimony. *Marx & Co. v. Diners' Club, Inc.*, 550 F.2d 505, 508, 510 (2d. Cir. 1977) (reversing district court's ruling allowing an expert lawyer to testify about legal obligations of parties). "It is not for witnesses to instruct the jury as to applicable principles of law, but for the judge." *Id*. at 509-10.

There is no factual information in any of the testimony defendants seek to offer that is the subject of this motion. Rather, by their own concession, defendants seek to use the opinion of its "disclosure experts" and expert "advisors," to impermissibly offer opinion testimony in this case. A lay person without specialized expertise is not qualified to offer opinions that Pfizer's disclosure documents were "'very robust and transparent.'" Dkt. No. 382 at 2 (citation omitted). That testimony is within the area of expertise of a securities law expert. Yet, defendants failed to disclose the person that they belatedly claim has this "expertise" – Dennis Block. Further, testimony regarding their ***opinions today*** about whether Pfizer's statements to investors regarding "substantial defenses" were misleading; conclusions of KPMG with respect to FAS 5 requirements; and compliance with the securities laws, are hopelessly entangled with the expertise of these witnesses defendants seek to bank on at trial, and not based on personal knowledge or personal investigation.

Compania Administradora de Recuperacion de Activos Administradora de Fondos de Inversion Sociedad Anonima v. Titan Int'l, Inc., 533 F.3d 555, 560-61 (7th Cir. 2008) (affirming exclusion of opinion testimony of undisclosed expert CEO of the value of collateral because it was not based on his personal knowledge at the time he made the valuation).[2] The disclosure obligations of Rule 26 are meant to be enforced, defendants have no excuse for not timely disclosing these witnesses as experts. Opinion testimony, such as that defendants seek to offer from these purported fact witnesses, is precluded from by Fed. R. Evid. 701 and any such testimony would be prejudicial to plaintiffs under Fed. R. Evid. 403 as well as needlessly cumulative of defendants' disclosed experts, including their accounting expert (William Holder, CPA) and government investigations expert (Nicholas Theodorou, Esq.).

Further, nearly all the cases defendants rely on were decided prior to the 2010 amendments to Rule 26 of the Federal Rules of Civil Procedure that required defendants to disclose witnesses who are not specially retained as testifying experts but who will offer expert opinions. *See* Advisory Committee Notes to Fed. R. Civ. P. 26 – 2010 Amendments. A disclosure defendants did not make. And several cases relied on by defendants were decided before the 2000 Amendments to Federal Rule of Evidence 701 that specifically foreclosed lay witness testimony "based on scientific, technical, or other specialized knowledge." Advisory Committee Notes to Fed. R. Evid. 701 – 2000 Amendments.

Defendants' cases are also factually inapposite. For example, unlike the opinion testimony here, the accountant in *United States v. Rigas*, 490 F.3d 208 (2d. Cir. 2007) did not testify as to appropriateness of any accounting treatment but rather testified as a fact witness as to the aggregate

[2] To illustrate the point, neither Block nor Fox were involved in the government investigations nor assessed the substantial defenses at issue in this case. *See* Memorandum of Law in Support of Plaintiffs' Motion for Partial Summary Judgment (Dkt. No. 287) at 6-8.

figure that he had tallied in a chart that was owed to the company assuming the transactions were a sham. *Id.* at 222-25. Similarly, unlike the testimony defendants seek to illicit here, the board member in *SEC v. Treadway*, 438 F. Supp. 2d 218 (S.D.N.Y. 2006), was not offering testimony as to whether a prospectus was misleading, but rather that what types of activities he would have expected would be disclosed to the board based on his personal understanding of the company's policies. *Id.* at 224.[3] Further, unlike this case, in *Eisenberg v. Gagnon*, 766 F.2d 770 (3d Cir. 1985), decided before the 2000 Amendment to Fed. R. Evid. 701, the lawyer disavowed expertise in the preparation of the documents at issue, testified against his own interests and testified without objection that the offering memoranda were not in compliance with the disclosure requirements. *Id.* at 780-82.

III. CONCLUSION

For the reasons set forth above and in plaintiffs' motion in *limine* to preclude opinion testimony by fact witnesses, plaintiffs respectfully request that the Court grant plaintiffs' motion and preclude defendants from offering impermissible opinion testimony from their fact witnesses at trial.

DATED: December 30, 2014

Respectfully submitted,

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[3] Defendants' other cited cases do not bear on the issues presented here. *See, e.g.*, *Palmieri v. Celebrity Cruise Lines, Inc.*, No. 98 Civ. 2037 (LAP) (HBP), 2000 U.S. Dist. LEXIS 3724, at *13-*17 (S.D.N.Y. Mar. 27, 2000) (a treating physician who was disclosed as an expert could testify as to opinions formed in the course of treatment but was subject to Rule 26(a)(2) for all other testimony; however, no objections on that basis were raised).

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