

Hellerstein

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., HENRY A. MCKINNEL, JEFFREY B.
KINDLER, FRANK D'AMELIO, DAVID L. SHEDLARZ,
ALAN G. LEVIN, and IAN C. READ,

Defendants.

Civil Action No.
10-CIV-3864 (AKH)

USDC SDNY
DOCUMENT
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DATE FILED: 6/22/10

STIPULATION AND PROPOSED ORDER

IT IS HEREBY STIPULATED, by and between the undersigned counsel for the parties herein, that:

(a) Cadwalader, Wickersham & Taft LLP is authorized to accept on behalf of defendants Pfizer Inc., Henry A. McKinnell, Jeffrey B. Kindler, Frank D'Amelio, David L. Shedlarz, Alan G. Levin and Ian C. Read ("Defendants"), and does hereby accept, service of the summons and complaint in this action without prejudice and without waiver of Defendants' defenses except as to sufficiency of service of process;

(b) Defendants' time to move, answer, or otherwise respond to the complaint filed in this matter is extended until after the Court enters an order appointing lead plaintiff and lead plaintiff's counsel and consolidating this case and any related cases (the "Lead Plaintiff Order");


(c) Subject to any modifications stipulated to by the parties or so ordered by the Court, the following schedule shall govern:

(i) Lead Plaintiff shall file a consolidated amended complaint forty-five (45) days after entry of the Lead Plaintiff Order,

- (ii) Defendants will have forty-five (45) days to move, answer or otherwise respond to any consolidated amended complaint filed by lead plaintiff;
- (iii) Lead Plaintiff shall have forty-five (45) days to oppose any motion filed by Defendants; and
- (iv) Defendants shall have thirty (30) days to file a reply.

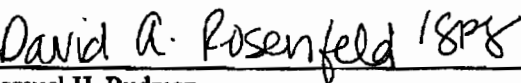
Dated: New York, New York
June 3, 2010

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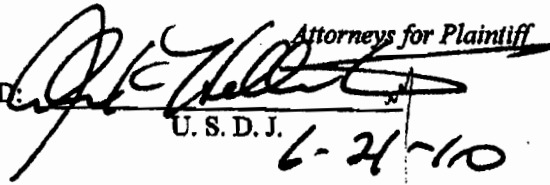
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SO ORDERED:


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U. S. D. J. 6-24-10