

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SEP 01 2010

928-913533

_____ X
 MARY K. JONES, Individually and on Behalf :
 of All Others Similarly Situated, :
 :
 Plaintiff, :
 :
 vs. :
 PFIZER INC., et al., :
 :
 Defendants. :
 _____ X

Civil Action No. 1:10-cv-03864-AKH

CLASS ACTION

NOTICE OF MOTION TO ADMIT
COUNSEL, WILLOW E. RADCLIFFE, *PRO HAC VICE*

SEP 1 11 31 09
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that upon the annexed affirmation of David A. Rosenfeld in support of this motion and the Certificate of Standing annexed hereto, we will move this Court before the Honorable Alvin K. Hellerstein at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an order allowing the admission of Willow E. Radcliffe, a member of the law firm of Robbins Geller Rudman & Dowd LLP, 100 Pine Street, Suite 2600, San Francisco, California 94111, 415/288-4545 and a member in good standing of the bar of the State of California, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against this applicant in any state or federal court.

DATED: August 31, 2010

ROBBINS GELLER RUDMAN & DOWD LLP
DAVID A. ROSENFELD



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[Proposed] Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

_____	x
MARY K. JONES, Individually and on Behalf	:
of All Others Similarly Situated,	:
	:
	:
Plaintiff,	:
	:
vs.	:
	:
PFIZER INC., et al.,	:
	:
Defendants.	:
_____	x

Civil Action No. 1:10-cv-03864-AKH

CLASS ACTION

AFFIRMATION OF DAVID A.
ROSENFELD IN SUPPORT OF MOTION
TO ADMIT COUNSEL, WILLOW E.
RADCLIFFE, *PRO HAC VICE*

DAVID A. ROSENFELD, affirms and states:

1. I am a member of Robbins Geller Rudman & Dowd LLP, counsel for plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiff's motion to admit Willow E. Radcliffe as counsel *pro hac vice* to represent plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 2001. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court..

3. Willow E. Radcliffe is a member of Robbins Geller Rudman & Dowd LLP, in San Francisco, California.

4. I have found Ms. Radcliffe to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

5. Accordingly, I am pleased to move the admission of Willow E. Radcliffe, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission of Willow E. Radcliffe, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Willow E. Radcliffe, *pro hac vice*, to represent plaintiffs in the above captioned matter, be granted.

Executed this 31st day of August, 2010, at Melville, New York.



DAVID A. ROSENFELD



**THE STATE BAR
OF CALIFORNIA**

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

CERTIFICATE OF STANDING

August 27, 2010

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, WILLOW EILEEN RADCLIFFE, #200087 was admitted to the practice of law in this state by the Supreme Court of California on December 31, 1998; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".

Kath Lambert
Custodian of Membership Records

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<hr/>		X
MARY K. JONES, Individually and on Behalf	:	Civil Action No. 1:10-cv-03864-AKH
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	[PROPOSED] ORDER FOR ADMISSION
	:	<i>PRO HAC VICE</i> ON WRITTEN MOTION
vs.	:	
	:	
PFIZER INC., et al.,	:	
	:	
Defendants.	:	
	:	
<hr/>		X

Upon the motion of David A. Rosenfeld, attorney for plaintiff and said sponsor attorney's affirmation in support;

IT IS HEREBY ORDERED that Willow E. Radcliffe of Robbins Geller Rudman & Dowd LLP, 100 Pine Street, Suite 2600, San Francisco, California 94111, telephone number 415/288-4545, fax number 415/288-4534, email address Wradcliffe@rgrdlaw.com, is hereby admitted to practice *pro hac vice* as counsel for plaintiff in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

DATED: _____

THE HONORABLE ALVIN K. HELLERSTEIN
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I, Kelly Stadelmann, hereby certify that on August 31, 2010, I caused a true and correct copy of the attached:

MOTION TO ADMIT COUNSEL *PRO HAC VICE* AND SUPPORTING DOCUMENTS

to be served by first-class mail to all counsel listed on the attached service list.


Kelly Stadelmann
Kelly Stadelmann

PFIZER 10

Service List - 8/31/2010 (10-0080)

Page 1 of 1

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