

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., HENRY A. MCKINNELL, JEFFREY B.
KINDLER, FRANK D'AMELIO, DAVID L. SHEDLARZ,
ALAN G. LEVIN, IAN C. READ, JOSEPH FECZKO,
KAREN KATEN, J. PATRICK KELLY, and ALLEN
WAXMAN,

Defendants.

ECF Case 10:cv-03864 (AKH)

DEFENDANTS' NOTICE OF MOTION TO DISMISS
CONSOLIDATED CLASS ACTION COMPLAINT

PLEASE TAKE NOTICE THAT, upon the accompanying Defendants' Memorandum of Law in Support of Motion to Dismiss the Consolidated Class Action Complaint (the "Complaint"), the Declaration of Hal S. Shaftel (with accompanying exhibits), and all other papers and proceedings herein, Defendants who to date have been served or have agreed to waive service (Pfizer Inc., Henry A. McKinnell, Jeffrey B. Kindler, Frank D'Amelio, David L. Shedlarz, Alan G. Levin, Ian C. Read, and Joseph Feczko) shall jointly move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge for the Southern District of New York, on a date and time to be set by the Court, for an Order dismissing the Complaint with prejudice pursuant to Federal Rule of Civil Procedure Rule 12(b)(6) and 9(b), and for such other and further relief as the Court deems just.

Dated: January 19, 2011
New York, New York

Respectfully submitted,

CADWALADER, WICKERSHAM & TAFT LLP

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