



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, I, David A. Rosenfeld, a member in good standing of the bar of this Court, hereby moves for an Order allowing the admission *pro hac vice* of:

Ryan A. Llorens  
Robbins Geller Rudman & Dowd LLP  
655 West Broadway, Suite 1900, San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)  
E-mail: ryanl@rgrdlaw.com


Ryan A. Llorens is a member in good standing of the Bar of the State of California and the Central District of California.

There are no pending disciplinary proceedings against Ryan A. Llorens in any State or Federal court.

DATED: January 13, 2011

Respectfully submitted,

ROBBINS GELLER RUDMAN  
& DOWD LLP  
SAMUEL H. RUDMAN  
DAVID A. ROSENFELD



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DAVID A. ROSENFELD

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Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

_____	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	: :
vs.	: DECLARATION OF DAVID A.
	: ROSENFELD IN SUPPORT OF MOTION
PFIZER INC., et al.,	: TO ADMIT COUNSEL, RYAN A.
	: LLORENS, <i>PRO HAC VICE</i>
Defendants.	: :
_____	x

DAVID A. ROSENFELD, deposes and says as follows:

1. I am a member of Robbins Geller Rudman & Dowd LLP, counsel for plaintiffs 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 plaintiffs' motion to admit Ryan A. Llorens as counsel *pro hac vice* to represent plaintiffs 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 2000. 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. Ryan A. Llorens is a member of Robbins Geller Rudman & Dowd LLP in San Diego, California.

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

5. Accordingly, I am pleased to move for the admission of Ryan A. Llorens, *pro hac vice*.

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

WHEREFORE, it is respectfully requested that the motion to admit Ryan A. Llorens, *pro hac vice*, to represent plaintiffs in the above-captioned matter, be granted.

DATED: January 13, 2011.

  
\_\_\_\_\_  
DAVID A. ROSENFELD



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1617

TELEPHONE: 888-800-3400

## CERTIFICATE OF STANDING

January 7, 2011

### TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, RYAN ANTHONY LLORENS, #225196 was admitted to the practice of law in this state by the Supreme Court of California on June 3, 2003; 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

Kath Lambert  
Custodian of Membership Records

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

_____	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
vs.	:	OF RYAN A. LLORENS, <i>PRO HAC VICE</i>
	:	ON WRITTEN MOTION
PFIZER INC., et al.,	:	
	:	
Defendants.	:	
_____	X	

Upon the motion of David A. Rosenfeld, attorney for plaintiffs, and said sponsor attorney's  
declaraion in support,

IT IS HEREBY ORDERED that

Ryan A. Llorens  
Robbins Geller Rudman & Dowd LLP  
655 West Broadway, Suite 1900, San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)  
E-mail: ryanl@rgrdlaw.com

is admitted to practice *pro hac vice* as counsel for plaintiffs 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](http://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 January 13, 2011, I caused a true and correct copy of the annexed documents to be served by U.S. mail to all counsel listed on the attached service list.

  
\_\_\_\_\_  
Kelly Stadelmann

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Service List - 1/13/2011 (10-0080)

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