

**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.

10-cv-03864 (AKH) ECF Case

**DEFENDANTS' NOTICE OF MOTION TO DISMISS PLAINTIFFS'
FIRST AMENDED CONSOLIDATED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that, upon the accompanying Defendants' Memorandum of Law in Support of Their Motion to Dismiss Plaintiffs' First Amended Consolidated Class Action Complaint and the May 24th, 2011 Affidavit of Amy D. Lamberti, Esq. (and the exhibits annexed thereto), defendants 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, will move, by and through their undersigned attorneys, before the Honorable Alvin K. Hellerstein, United States District Judge at the United States Courthouse, 500 Pearl Street, Courtroom 14D, New York, New York 10007, on July 12, 2011, or such date and time as the Court determines, for an Order (i) dismissing with prejudice the First Amended Consolidated Class Action Complaint pursuant to Fed. R. Civ. P. 8, 9(b) and 12(b)(6), and (ii) awarding such other and further relief as the Court may deem just and proper.

Dated: New York, New York
May 24, 2011

CAHILL GORDON & REINDEL LLP

By: /s/ David G. Januszewski

Bart Friedman
(bfriedman@cahill.com)
Charles A. Gilman
(cgilman@cahill.com)
David G. Januszewski
(djanuszewski@cahill.com)
S. Penny Windle
(pwindle@cahill.com)
Eighty Pine Street
New York, New York 10005-1702
Tel: (212) 701-3000

- and -

CADWALADER, WICKERSHAM & TAFT LLP
Dennis J. Block
(dennis.block@cwt.com)
Hal S. Shaftel
(hal.shaftel@cwt.com)
One World Financial Center
New York, New York 10281
Tel.: (212) 504-6000

Attorneys for Defendants