

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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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	:	
	:	PLAINTIFFS' NOTICE OF MOTION FOR
vs.	:	CLASS CERTIFICATION
	:	
PFIZER INC., et al.,	:	
	:	
Defendants.	:	
_____	X	

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that lead plaintiff Stichting Philips Pensioenfonds (“Stichting”) and named plaintiff Mary K. Jones individually and as trustee of the Mary K. Jones Revocable Trust (“Jones”) (collectively, “plaintiffs”), will move the Honorable Alvin K. Hellerstein, United States District Court Judge for the Southern District of New York, on a date and at such time as may be designated by the Court, at 500 Pearl Street, New York, NY 10007, for an order: (1) certifying the class as defined in the Memorandum of Law; (2) appointing Stichting and Jones as class representatives; and (3) appointing Robbins Geller Rudman & Dowd LLP as class counsel. In support of this motion, plaintiffs submit the accompanying documents:

- Memorandum of Law in Support of Motion for Class Certification;
- Declaration of Steven P. Feinstein, Ph.D., CFA, with the following exhibits:
  - Exhibit 1: Curriculum Vitae;
  - Exhibit 2: Regression Results; and
  - Exhibit 3: Event Study Results.
- Declaration of Willow E. Radcliffe in Support of Plaintiffs’ Motion for Class Certification, with the following exhibits:
  - Exhibit 4: Amended Certification of Named Plaintiff Pursuant to Federal Securities Laws;
  - Exhibit 5: Excerpts from the deposition of Theo Kamps, the Federal Rule of Civil Procedure 30(b)(6) designee for Stichting Philips Pensioenfonds, taken on January 11, 2012 (unofficial transcript);
  - Exhibit 6: Excerpts from the deposition of Mary K. Jones, taken on December 15, 2011, (unofficial transcript);
  - Exhibit 7: Mary K. Jones Revocable Trust Agreement; and
  - Exhibit 8: Plaintiff’s Certification of Investment of Pfizer.

- [Proposed] Order Granting Plaintiffs' Motion for Class Certification.

DATED: January 13, 2012

ROBBINS GELLER RUDMAN  
& DOWD LLP  
WILLOW E. RADCLIFFE  
DANIEL J. PFEFFERBAUM  
MATTHEW S. MELAMED

s/ Willow E. Radcliffe  
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WILLOW E. RADCLIFFE

Post Montgomery Center  
One Montgomery Street, Suite 1800  
San Francisco, CA 94104  
Telephone: 415/288-4545  
415/288-4534 (fax)  
willowr@rgrdlaw.com  
dpfefferbaum@rgrdlaw.com  
mmelamed@rgrdlaw.com

ROBBIN GELLER RUDMAN  
& DOWD LLP  
SAMUEL H. RUDMAN  
58 South Service Road, Suite 200  
Melville, NY 11747  
Telephone: 631/367-7100  
631/367-1173 (fax)  
srudman@rgrdlaw.com

ROBBINS GELLER RUDMAN  
& DOWD LLP  
HENRY ROSEN  
TRIG R. SMITH  
RYAN A. LLORENS  
655 West Broadway, Suite 1900  
San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)  
henryr@rgrdlaw.com  
trigs@rgrdlaw.com  
ryanl@rgrdlaw.com

Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2012, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 13, 2012.

s/ Willow E. Radcliffe

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WILLOW E. RADCLIFFE

ROBBINS GELLER RUDMAN  
& DOWD LLP  
Post Montgomery Center  
One Montgomery Street, Suite 1800  
San Francisco, CA 94104  
Telephone: 415/288-4545  
415/288-4534 (fax)  
E-mail: willowr@rgrdlaw.com

## Mailing Information for a Case 1:10-cv-03864-AKH

### Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Charles Alan Gilman**  
cgilman@cahill.com
- **James M. Hughes**  
jhughes@motleyrice.com,erichards@motleyrice.com,kweil@motleyrice.com
- **David George Januszewski**  
djanuszewski@cahill.com
- **Joe Kendall**  
administrator@kendalllawgroup.com,jkendall@kendalllawgroup.com,hlindley@kendallawgroup.com
- **Leigh R. Lasky**  
lasky@laskyrifkind.com
- **Hamilton Philip Lindley**  
hlindley@goldfarbbranham.com
- **Ryan A. Llorens**  
ryanl@rgrdlaw.com
- **Matthew Melamed**  
mmelamed@rgrdlaw.com
- **Donald Alan Migliori**  
dmigliori@motleyrice.com
- **Danielle S. Myers**  
dmyers@rgrdlaw.com,e\_file\_sd@rgrdlaw.com
- **William H. Narwold**  
bnarwold@motleyrice.com,imoll@motleyrice.com,vlepine@motleyrice.com,ajanelle@motleyrice.com
- **Willow E. Radcliffe**  
willowr@rgrdlaw.com
- **Joseph F. Rice**  
jrice@motleyrice.com
- **Darren J. Robbins**  
e\_file\_sd@rgrdlaw.com
- **Henry Rosen**  
henryr@rgrdlaw.com,dianah@rgrdlaw.com
- **David Avi Rosenfeld**  
drosenfeld@rgrdlaw.com,e\_file\_ny@rgrdlaw.com,e\_file\_sd@rgrdlaw.com,danim@rgrdlaw.com
- **Samuel Howard Rudman**  
srudman@rgrdlaw.com,e\_file\_ny@rgrdlaw.com

- **Trig Randall Smith**  
trigs@rgrdlaw.com,e\_file\_sd@rgrdlaw.com,nhorstman@rgrdlaw.com
- **Mitchell M.Z. Twersky**  
mtwersky@aftlaw.com

## **Manual Notice List**

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

### **Catherine J. Kowalewski**

Robbins Geller Rudman & Dowd LLP (San Diego)  
655 West Broadway  
Suite 1900  
San Diego, CA 92101

### **David C. Walton**

Lerach, Coughlin, Stoia, Geller, Rudman & Robbins, L.L.P.  
655 W. Broadway  
Suite 1900  
San Diego, CA 92101-3301