



I, WILLOW E. RADCLIFFE, declare as follows:

1. I am a partner in the law firm of Robbins Geller Rudman & Dowd LLP and counsel to lead plaintiff Stichting Philips Pensioenfond. I am duly licensed to practice before all courts of the State of California and admitted *pro hac vice* in this case. I have personal knowledge of the matters stated herein and, if called upon, I could and would competently testify thereto.

2. Attached hereto are true and correct copies of the following documents in support of Plaintiffs' Motion for Class Certification, filed herewith:

Exhibit 4: Amended Certification of Lead 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 Pensioenfond, taken on January 11, 2012 (unofficial transcript) [submitted for filing under seal];

Exhibit 6: Excerpts from the deposition of Mary K. Jones, taken on December 15, 2011, (unofficial transcript) [submitted for filing under seal];

Exhibit 7: Mary K. Jones Revocable Trust Agreement, dated August 28, 1997 [submitted for filing under seal]; and

Exhibit 8: Plaintiff's Certification of Investment of Pfizer.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed January 13, 2012, at San Francisco, California.

s/ Willow R. Radcliffe  
\_\_\_\_\_  
WILLOW E. RADCLIFFE

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  
\_\_\_\_\_  
WILLOW E. RADCLIFFE

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

### Electronic Mail Notice List

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## **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**

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655 West Broadway  
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San Diego, CA 92101

### **David C. Walton**

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

# EXHIBIT 4

AMENDED CERTIFICATION OF NAMED PLAINTIFF  
PURSUANT TO FEDERAL SECURITIES LAWS

STICHTING PHILIPS PENSIOENFONDS (“Plaintiff”) declares:

1. Plaintiff has reviewed a complaint and authorized its filing.
2. Plaintiff did not acquire the security that is the subject of this action at the direction of plaintiff’s counsel or in order to participate in this private action or any other litigation under the federal securities laws.
3. Plaintiff is willing to serve as a representative party on behalf of the class, including providing testimony at deposition and trial, if necessary.
4. Plaintiff has made the following transaction(s) during the Class Period in the securities that are the subject of this action:

<u>Security</u>	<u>Transaction</u>	<u>Date</u>	<u>Price Per Share</u>
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*See attached Schedule A.*

5. Plaintiff has not sought to serve or served as a representative party in a class action that was filed under the federal securities laws within the three-year period prior to the date of this Certification except as detailed below:

*City of Monroe Employees’ Retirement System v. The Hartford Financial Services Group, Inc., et al., No. 1:10-CV-02835-NRB (S.D.N.Y.)*

6. The Plaintiff will not accept any payment for serving as a representative party on behalf of the class beyond the Plaintiff’s pro rata share of any recovery,

except such reasonable costs and expenses (including lost wages) directly relating to the representation of the class as ordered or approved by the court.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed this 10<sup>th</sup> day of January, 2012.

STICHTING PHILIPS PENSIOENFONDS

Signature: \_\_\_\_\_

Print Name: \_\_\_\_\_

Print Title: \_\_\_\_\_





## SCHEDULE A

## SECURITIES TRANSACTIONS

## Acquisitions

<u>Date Acquired</u>	<u>Type/Amount of Securities Acquired</u>	<u>Price</u>
03/17/2006	122,000	\$26.25
03/17/2006	220,100	\$26.41
03/20/2006	14,000	\$26.45
03/21/2006	33,900	\$26.35
05/17/2006	11,800	\$24.76
05/17/2006	150,200	\$24.45
06/16/2006	221,400	\$23.37
08/03/2006	33,459	\$25.63
09/12/2006	100,250	\$27.97
10/04/2006	98,760	\$28.41
12/06/2006	40,000	\$24.97
12/18/2006	330,000	\$25.83
03/22/2007	23,700	\$25.84
03/22/2007	37,600	\$25.73
03/23/2007	3,400	\$25.69
03/23/2007	4,400	\$25.60
03/26/2007	96,000	\$25.56
04/09/2007	4,000	\$25.95
05/18/2007	48,000	\$27.41
05/21/2007	10,200	\$27.45
05/24/2007	133,800	\$27.32
06/25/2007	23,700	\$25.52
06/26/2007	36,230	\$25.59
06/27/2007	270	\$25.59
07/16/2007	6,000	\$26.00
07/23/2007	6,000	\$25.12
09/04/2007	41,900	\$25.04
09/05/2007	19,700	\$24.69
09/10/2007	9,000	\$24.03
09/24/2007	7,000	\$24.50
10/01/2007	2,000	\$24.80
10/18/2007	125,000	\$24.81
10/22/2007	8,000	\$23.98
11/12/2007	6,000	\$23.05
12/17/2007	9,000	\$23.09
12/24/2007	4,000	\$23.25
12/31/2007	5,000	\$22.76
01/22/2008	5,000	\$22.07
02/25/2008	1,000	\$22.69
03/10/2008	2,000	\$21.23
03/17/2008	3,000	\$20.61
04/14/2008	6,000	\$20.55
04/21/2008	12,000	\$20.22

06/09/2008	49,000	\$18.04
06/16/2008	2,000	\$17.81
06/23/2008	3,000	\$17.39
11/24/2008	3,000	\$15.97
12/22/2008	8,000	\$17.20
01/05/2009	2,000	\$18.19
01/12/2009	2,000	\$17.41

**Sales**

<u>Date Sold</u>	<u>Type/Amount of Securities Sold</u>	<u>Price</u>
01/03/2007	135,000	\$25.98
05/07/2007	3,000	\$27.18
05/21/2007	2,000	\$27.45
06/25/2007	5,000	\$25.52
07/02/2007	2,000	\$25.69
08/06/2007	9,000	\$23.92
08/13/2007	5,000	\$23.95
08/20/2007	2,000	\$24.12
09/25/2007	11,476	\$24.30
11/20/2007	23,508	\$22.79
01/08/2008	6,741	\$23.69
01/14/2008	34,000	\$23.97
02/01/2008	53,332	\$23.52
03/03/2008	47,000	\$22.22
04/17/2008	167,412	\$20.40
05/05/2008	3,000	\$20.52
07/07/2008	34,000	\$17.50
08/26/2008	24,900	\$19.31
08/27/2008	11,000	\$19.12
08/27/2008	39,300	\$19.05
08/27/2008	82,500	\$19.08
08/28/2008	43,000	\$19.22
08/29/2008	8,600	\$19.30
09/02/2008	6,400	\$19.47
09/30/2008	90,000	\$17.93
10/06/2008	22,000	\$18.45
11/04/2008	55,000	\$18.28

\*Opening position of 125,000 shares.

*TJG*

**EXHIBITS 5-7**

**FILED UNDER SEAL**

# EXHIBIT 8

Plaintiff's Certification of Investment of  
Pfizer

I, Mary Jones, hereby certify that the following is true and correct to the best of my knowledge, information and belief:

1. I have reviewed the Complaint in this action and authorize the filing of this Certification.
2. If chosen, I am willing to serve as a representative party on behalf of the class (the "Class") as defined in the Complaint, including providing testimony at deposition and trial (if necessary). I am willing to participate on an executive committee of shareholders.
3. Plaintiff's transaction in PFE security that is the subject of this action is:

# SHARES PURCHASED	DATE PURCHASED	PRICE PER SHARE	CLASS OF STOCK (e.g. COMMON)	IF SOLD, # OF SHARES SOLD	DATE SOLD (if sold)	PER SHARE SOLD PRICE
500	9-18-07	23.99	COMMON			

4. I did not purchase these securities at the direction of my counsel, or in order to participate in a lawsuit under the Securities Exchange Act of 1934.
5. During the three-year period preceding the date of the Certification, I have not sought to serve, nor have I served, as a representative to any party or on behalf of any class in any action arising under the Securities Exchange Act of 1934.
6. I will not accept any payment if chosen to serve as a representative party on behalf of the Class beyond my pro rata share of an award to the Class, or as otherwise ordered and approved by the Court.

Signed under penalty of perjury, this 15 day of SEPT, 2009.

Mary K. Jones  
Signature

MARY K. JONES  
Name (please print)

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