

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARY K. JONES, Individually and on Behalf of All Others Similarly Situated, <p style="text-align: center;">Plaintiff</p> vs. PFIZER INC., et al., <p style="text-align: center;">Defendants.</p>	X Civil Action No. 1:10-cv-03864-AKH : CLASS ACTION : PLAINTIFFS' NOTICE OF MOTION AND MOTION TO FILE UNDER SEAL : : : : X
--	---

*I will decide the
motion at the argument
of the main motion.
Meanwhile, counsel should
seek to agree to withdraw
nos. 5, 6 and 7, since they appear to
be of marginal relevance.*

RECEIVED
JAN 17 2012
CHAMBERS OF
ALVIN K. HELLERSTEIN
U.S.D.J.

1-17-12

[Handwritten signature]

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/19/12

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”), by their counsel, shall move, before the Honorable Alvin K. Hellerstein, U.S. District Judge, United States District Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time as may be designated by the Court, for an Order (attached hereto as Exhibit 1) permitting plaintiffs to file under seal Exhibits 5 through 7 to the Declaration of Willow E. Radcliffe in Support of Plaintiffs’ Motion for Class Certification (“Radcliffe Decl.”). Exhibits 5 and 6 are deposition excerpts from the depositions of Theo Kamps, the Federal Rule of Civil Procedure 30(b)(6) designee for Stichting, and Jones. Exhibit 7 is Jones’ Revocable Trust Agreement. Exhibits 5, 6 and 7 contain financial and personal information that has been designated as “Confidential” pursuant to the Stipulated Protective Order, approved by the Court on October 18, 2011 (Dkt. No. 93) (attached hereto as Exhibit 2).

Pursuant to Paragraph 3 of the Stipulated Protective Order, plaintiffs respectfully request leave to file Exhibits 5, 6 and 7 to the Radcliffe Decl. under seal.

DATED: January 13, 2012

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

s/ Willow E. Radcliffe
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

- 1 -

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

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,hindley@kendallawgroup.com
- **Leigh R. Lasky**
lasky@laskyrifkind.com
- **Hamilton Philip Lindley**
hindley@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@aflaw.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