## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

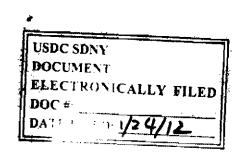
MARY K. JONES, INDIVIDUALLY AND ON BEHALF OF ALL OTHERS SIMILARLY SITUATED,

Plaintiff,

- against -

PFIZER INC., ET AL.,

Defendants.



Civil Action No. 1:10-cv-03864 (AKH)

## STIPULATION AND PROPOSED ORDER

WHEREAS, the Court established a schedule for class certification at a November 29, 2011 hearing, as set forth below:

WHEREAS, on January 13, 2012, plaintiffs filed their Notice of Motion for Class Certification, which included a Declaration of Steven P. Feinstein, Ph.D., CFA in Support of Plaintiffs' Motion for Class Certification;

WHEREAS, the defendants' Opposition to Class Certification is due on January 25, 2012;

WHEREAS, the plaintiffs' Reply in further support of their motion for class certification is due on February 1, 2012;

WHEREAS, the defendants have requested that Dr. Feinstein be made available for a deposition;

WHEREAS, plaintiffs have agreed to make Dr. Feinstein available for a deposition on January 24, 2012 in Boston, Massachusetts;

WHEREAS, the defendants have not previously requested any extension of this January 25, 2012 deadline; and

WHEREAS, the plaintiffs would like additional time to depose defendants' market efficiency expert, if any, and have not have not previously requested any extension of the class certification briefing schedule.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties herein, that, subject to the approval of the Court, the time for all defendants to file their Opposition to Class Certification is extended to February 1, 2012, the time for plaintiffs to file their Reply in Support of Class Certification is extended to February 15, 2012.

Dated: January 19, 2012

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Attorneys for Defendants

SO ORDERED:

The Honorable Alvin K. Hellerstein

United States District Judge