

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.

ECF Case 10:cv-03864 (AKH)

NOTICE OF MOTION TO WITHDRAW AS CO-COUNSEL

PLEASE TAKE NOTICE THAT, upon the accompanying Affirmation of Hal S. Shaftel, and all other papers and proceedings herein, the undersigned firm of Cadwalader, Wickersham & Taft LLP moves this Court, before the Honorable Alvin K. Hellerstein, United States District Judge for the Southern District of New York, on a date and time to be set by the Court, for an Order pursuant to Local Rule 1.4 granting its Motion to Withdraw as Co-Counsel for Defendants, and the matter will proceed with co-counsel remaining in the case.

Dated: October 31, 2011
New York, New York

Respectfully submitted,

CADWALADER, WICKERSHAM & TAFT
LLP

By: /s/ Hal S. Shaftel
Hal S. Shaftel
One World Financial Center
New York, NY 10281
(212) 504-6000

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.

No. 10-cv-03864 (AKH)

AFFIRMATION

I, Hal S. Shaftel, Esq., respectfully submit this Affirmation pursuant to Local Civil Rule 1.4, in support of the motion of Cadwalader, Wickersham & Taft LLP ("CWT") to withdraw as co-counsel for the Defendants in the above-captioned matter, and the matter will proceed with co-counsel remaining in the case. The reasons for the withdrawal are as follows:

1. Charles A. Gilman and David G. Januszewski of Cahill, Gordon and Reindel LLP ("Co-Counsel") appeared on behalf of all Defendants on April 15, 2011 (Docket Nos. 72, 73), and will continue to represent all Defendants in this action.
2. Co-Counsel is positioned to efficiently proceed without CWT's continued participation.
3. Dennis J. Block was the only attorney from CWT who was listed as attorney of record. However, as of September 8, 2011, Mr. Block no longer has been associated with CWT.
4. The parties to this action are currently proceeding in discovery, and the withdrawal will have no effect.
5. I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 31, 2011
New York, New York

/s/ Hal S. Shaftel