

**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., et al.,

Defendants.

Case No. 10-cv-03864 (AKH)

ECF Case

**NOTICE OF JOINT MOTION
TO FILE UNDER SEAL**

PLEASE TAKE NOTICE that, in accordance with Paragraph 7 of the Stipulated Protective Order (the “Protective Order”) in this case, Dkt. No. 93, the parties in the above-captioned matter, 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 the filing of the parties’ July 8, 2013 Joint Letter and Exhibits D, E, G, H, I, J and K thereto, under seal. The Joint Letter, and these exhibits, contain information that has been designated confidential pursuant to the terms of the parties’ Protective Order.

By this motion, the parties seek only to comply with Paragraph 7 of the Protective Order; any party seeking to maintain the seal as to those documents may make an appropriate submission to the Court, as provided by the Protective Order.

DATED: July 8, 2013

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of July, 2013, I caused the foregoing to be electronically filed with the clerk of the court by using the CM/ECF system. Notice of this filing will be sent to counsel for the parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/ Amanda MacDonald
Amanda MacDonald

EXHIBIT 1

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**[PROPOSED] ORDER FOR JOINT
MOTION TO FILE UNDER SEAL**

Having considered the parties' Joint Motion to File Under Seal, and good cause appearing therefore, the Court hereby GRANTS the motion.

The parties' Joint Letter dated July 8, 2013 and Exhibits D, E, G, H, I, J and K thereto, SHALL BE MAINTAINED UNDER SEAL, subject to further order of the Court.

SO ORDERED.

Dated: _____

THE HONORABLE ALVIN K. HELLERSTEIN
UNITED STATES DISTRICT JUDGE