

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

_____ X	
MARY K. JONES, Individually and on Behalf : of All Others Similarly Situated, :	Civil Action No. 1:10-cv-03864-AKH
	:
Plaintiff :	<u>CLASS ACTION</u>
	:
vs. :	DECLARATION OF LEIGH LASKY FILED
	ON BEHALF OF LASKY & RIFKIND, LTD.
	IN SUPPORT OF APPLICATION FOR
PFIZER INC., et al., :	AWARD OF ATTORNEYS' FEES AND
	EXPENSES
Defendants. :	
_____ X	

I, Leigh R. Lasky, declare as follows:

1. I am a member of the firm of Lasky & Rifkind, Ltd. I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses/charges ("expenses") in connection with services rendered in the above-entitled action. I am over the age of 21 and can competently testify to the facts stated herein.

2. This firm is counsel of record for plaintiffs Martin Meister, Paul Meister, and Carol Meister. Subsequent to this Court's appointment of Lead Plaintiff and Lead Counsel, this firm's only work on this matter on behalf of the Class was undertaken at the express request of and under the direct supervision of Lead Counsel. Lead Counsel also requested periodic billing statements from us to ensure minimal duplication of efforts and a review of work we performed as requested.

3. The information in this declaration regarding the firm's time and expenses is taken from time and expense printouts and supporting documentation prepared and/or maintained by the firm in the ordinary course of business. I am the member of the firm who oversaw and/or conducted the day-to-day activities in the litigation and I reviewed these printouts (and backup documentation where necessary or appropriate) in connection with the preparation of this declaration. The purpose of this review was to confirm both the accuracy of the entries on the printouts as well as the necessity for, and reasonableness of, the time and expenses committed to the litigation. The time reflected in the firm's lodestar calculation and the expenses for which payment is sought as set forth in this declaration are reasonable in amount and were necessary for the effective and efficient prosecution and resolution of the litigation. In addition, I believe that the expenses are all of a type that would normally be charged to a fee-paying client in the private legal marketplace.

4. The total number of hours spent on this litigation from inception through January 8, 2015 by my firm is 5,828.35. I personally performed or oversaw all of Lasky & Rifkind's work in

this Action. The total lodestar amount (*i.e.*, hours worked multiplied by hourly rates) for attorney/paraprofessional time based on the firm's current rates is \$2,080,717.50. A breakdown of the lodestar is provided below. The hourly rates shown are the usual and customary rates set by the firm for all large hourly matters and class actions:

<i>NAME</i>		<i>HOURS</i>	<i>RATE</i>	<i>LODESTAR</i>
Amelia Newton	(A)	1,217.75	525	\$639,318.75
Ashley Bump	(A)	908.75	275	\$249,906.25
Heather Couch	(A)	316.50	275	\$87,037.50
Heidi VonderHeide	(A)	195.25	350	\$68,337.50
Kristina Wolter	(PL)	8.00	125	\$1,000.00
Leigh Lasky	(M)	181.75	895	\$162,666.25
Norman Rifkind	(M)	112.75	695	\$78,361.25
Marta Fischl	(A)	2,887.60	275	\$794,090.00
<b>TOTAL:</b>		<b>5,828.35</b>		<b>\$2,080,717.50</b>

(M) Member

(A) Attorney

(PL) Paralegal

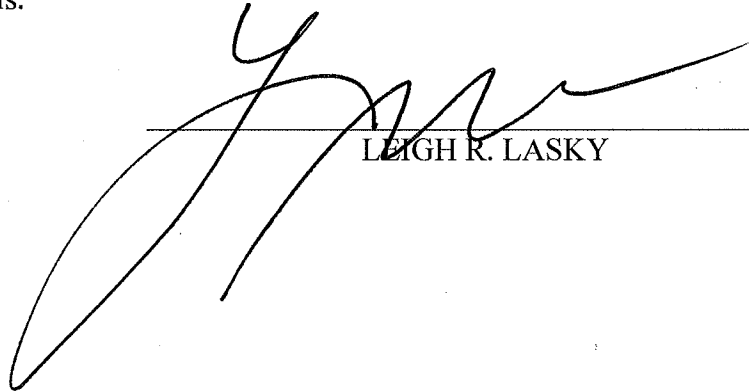
5. My firm seeks an award of \$3,301.42 in expenses and charges in connection with the prosecution of the litigation.

6. These expenses were incurred as follows: (1) \$155.63 in Pacer and Lexis research expenses; (2) \$2,697.04 in travel expenses for lawyers travelling to and from San Diego for document review training and meeting with Lead Counsel; and (3) \$448.75 in photocopy costs.

7. The expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from receipts, expense vouchers, check records and other documents and are an accurate record of the expenses.

8. The identification and background of my firm and its members is attached hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 2<sup>nd</sup> day of April, 2015, at Chicago, Illinois.



---

LEIGH R. LASKY

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2015, 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 May 6, 2015.

s/ HENRY ROSEN

---

HENRY ROSEN

ROBBINS GELLER RUDMAN  
& DOWD LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101-8498  
Telephone: 619/231-1058  
619/231-7423 (fax)

E-mail:HenryR@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.

- **Michael Scott Bailey**  
michael.bailey@skadden.com
- **Sidney Bashago**  
sidney.bashago@dpw.com,jennifer.kan@davispolk.com,ecf.ct.papers@davispolk.com
- **Sheila L. Birnbaum**  
sheilabirnbaum@quinnemanuel.com
- **George Anthony Borden**  
gborden@wc.com
- **Kevin Anthony Burke**  
kaburke@sidley.com,nyefiling@sidley.com,efilingnotice@sidley.com
- **Michael Barry Carlinsky**  
michaelcarlinsky@quinnemanuel.com,brantkuehn@quinnemanuel.com,jomairecrawford@quinnemanuel.com
- **Lauren Kristina Collogan**  
lcollogan@wc.com
- **Patrick Daniel Curran**  
patrickcurran@quinnemanuel.com,justinemanzano@quinnemanuel.com
- **Keir Nicholas Dougall**  
kdougall@dougallpc.com
- **Michael Joseph Dowd**  
miked@rgrdlaw.com,debg@rgrdlaw.com,e\_file\_sd@rgrdlaw.com,tome@rgrdlaw.com
- **Alexander C Drylewski**  
alexander.drylewski@skadden.com
- **Charles S. Duggan**  
charles.duggan@dpw.com,ecf.ct.papers@davispolk.com
- **Steven M. Farina**  
sfarina@wc.com
- **Jason A. Forge**  
jforge@rgrdlaw.com,tholindrake@rgrdlaw.com,e\_file\_SD@rgrdlaw.com
- **Ross Bradley Galin**  
rgalin@omm.com,mochoa@omm.com,neverhart@omm.com,lisachen@omm.com
- **Gary John Hacker**  
ghacker@skadden.com
- **James R. Harper**  
coljamesrharper@me.com
- **Howard E. Heiss**  
hheiss@omm.com,#nymanagingattorney@omm.com
- **Paul T. Hourihan**  
phourihan@wc.com
- **James M. Hughes**  
jhughes@motleyrice.com,kweil@pacernotice.com,mgruetzmacher@motleyrice.com,erichards@motleyrice.com,kweil@motleyrice.com
- **Jay B. Kasner**  
jkasner@skadden.com

- **Joe Kendall**  
administrator@kendalllawgroup.com,jkendall@kendalllawgroup.com,hlindley@kendalllawgroup.com
- **Brant Duncan Kuehn**  
brantkuehn@quinnemanuel.com
- **Leigh R. Lasky**  
lasky@laskyrifkind.com
- **Hamilton Philip Lindley**  
hlindley@deanslyons.com
- **Ryan A. Llorens**  
ryanl@rgrdlaw.com,nbear@rgrdlaw.com,kirstenb@rgrdlaw.com
- **Amanda M. MacDonald**  
amacdonald@wc.com
- **Lori McGill**  
lorialvinomcgill@quinnemanuel.com
- **Matthew McLamed**  
mmclamed@rgrdlaw.com
- **Donald Alan Migliori**  
dmigliori@motleyrice.com
- **Eugene Mikołajczyk**  
genem@rgrdlaw.com
- **Seema Mittal**  
smittal@wc.com
- **Cynthia Margaret Monaco**  
cmonaco@cynthiamonacolaw.com,cmmonaco@gmail.com
- **Juliana Newcomb Murray**  
juliana.murray@davispolk.com,lisa.hirakawa@davispolk.com,ecf.ct.papers@davispolk.com
- **Scott D. Musoff**  
smusoff@skadden.com,aviva.nusbaum@skadden.com
- **Danielle Suzanne Myers**  
dmyers@rgrdlaw.com
- **William H. Narwold**  
bnarwold@motleyrice.com,vlepine@motleyrice.com,ajanelle@motleyrice.com
- **Ivy T. Ngo**  
ingo@rgrdlaw.com,e\_file\_sd@rgrdlaw.com
- **Joseph G. Petrosinelli**  
jpetrosinelli@wc.com
- **Theodore J. Pinar**  
tedp@rgrdlaw.com,e\_file\_sd@rgrdlaw.com
- **Willow E. Radcliffe**  
willowr@rgrdlaw.com,ptiffith@rgrdlaw.com
- **Joseph F. Rice**  
jrice@motleyrice.com
- **Darren J. Robbins**  
e\_file\_sd@rgrdlaw.com
- **Daniel Prugh Roeser**  
droeser@goodwinprocter.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
- **James P. Rouhandeh**  
james.rouhandeh@dpw.com,ecf.ct.papers@davispolk.com
- **Samuel Howard Rudman**  
srudman@rgrdlaw.com,e\_file\_ny@rgrdlaw.com,mblasy@rgrdlaw.com,e\_file\_sd@rgrdlaw.com
- **Stuart Michael Sarnoff**  
ssarnoff@omm.com
- **William E. Schurmann**  
wschurmann@wc.com
- **Trig Randall Smith**  
trigs@rgrdlaw.com,e\_file\_sd@rgrdlaw.com,nhorstman@rgrdlaw.com
- **Jennifer Lynn Spaziano**  
jen.spaziano@skadden.com
- **Meghan K. Spillane**  
mspillane@goodwinprocter.com,sewald@goodwinprocter.com,ttam@goodwinprocter.com
- **Richard Mark Strassberg**  
rstrassberg@goodwinprocter.com,nymanagingclerk@goodwinprocter.com
- **Mitchell M.Z. Twersky**  
mtwersky@aftlaw.com
- **John K. Villa**  
jvilla@wc.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.

**Daniel E. Hill**  
Kendall Law Group, LLP  
3232 McKinney Avenue  
Suite 700  
Dallas, TX 75204

**Catherine J. Kowalewski**  
Robbins Geller Rudman & Dowd LLP (San Diego)  
655 West Broadway  
Suite 1900  
San Diego, CA 92101

**Jamie J. McKey**  
Kendall Law Group, LLP  
3232 McKinney Avenue  
Suite 700  
Dallas, TX 75204

**David C. Walton**  
Robbins Geller Rudman & Dowd LLP (SAN DIEGO)  
655 West Broadway  
Suite 1900  
San Diego, CA 92101



# **EXHIBIT A**

## **Lasky & Rifkind, Ltd.**

**Lasky & Rifkind, Ltd.** is a law firm that has substantial experience in securities fraud and complex commercial litigation with an emphasis on securities class actions, shareholder and unit holder derivative suits as well as other commercial litigation. The firm has represented clients in arbitration forums and state and federal courts throughout the nation and its principals have appeared in over 30 different state and federal jurisdictions. The firm has participated in securities and derivative lawsuits where counsel have negotiated significant settlements on behalf of limited partners, unit holders, shareholders, or class members, including the following: White v. Heartland Municipal Bond Funds, U.S. District Court for the Eastern District of Wisconsin, Case No. 00-C-1388, Barry Aron v. K. Donald Menefee, et al., U.S. District Court For The District Of Columbia, Case No. 91-3185-RCL; Estate of John L. Flake v. William K. Hoskins, et al., District of Kansas, C.A. No. 98-2450; James F. Schofield, et al. v. McNeil Partners, et al., Superior Court for the State of California for the County of Los Angeles, Case No. BC 133799; Michael Calabrese and Joseph Santoro v. Richard Barbieri, Sr., Richard Barbieri, Jr., et al., U.S. District Court for the District of Connecticut, Case No. 3:92-CV-322; Jack M. Carlstrom, et al. v. Arvida/JMB Managers, Inc., et al., Circuit Court of Cook County, Case No. 96 CH 6892; Joseph A. Ganino v. Citizens Utilities Company, et al., U.S. District Court District of Connecticut, Civil Action No. 3:98CV00480; Vadim Kisinko, et al. v. STB Systems, Inc., et al., U.S. District Court Northern District of Texas Dallas Division, C.A. No. 3:99 CV-2872-M; Arvida/JMB Partners, L.P. v. Vanderbilt Income and Growth Associates, L.L.C. and Raleigh Capital Associates, L.P., Court of Chancery for the State of Delaware in and for New Castle County, C.A. No. 15238; Kenneth Flaxman v. Countrywide Home Loans, Inc., Circuit Court of Cook County, Case No. 98 CH 05947; Barry Neil Lowe v. Compuserve, Inc., Circuit Court of Cook County, Case No. 90 CH 977 ; In re Prison Realty Securities Litigation, U.S. District Court, Middle District of Tennessee, Civil Action No. 3:99-0452.

**Leigh Lasky** is a member of the firm and concentrates his practice in securities and commercial litigation and has extensive experience in connection with limited partnerships and tender offer litigation. Mr. Lasky is admitted to practice in the states of Illinois, New York, the U.S. District Court for the Northern District of Illinois including, Trial Bar, and the Southern District of New York. Mr. Lasky has argued appeals in the following appellate courts: Seventh Circuit, Illinois Appellate Court, New York Appellate Division and the Georgia Court of Appeals. Mr. Lasky received his B.A. Degree from the University of Illinois and his J.D. Degree from The John Marshall School of Law.

**Norman Rifkind** is a member of the firm, concentrating his practice in securities, commercial, and consumer fraud litigation. Mr. Rifkind is a member of the Illinois bar and is a member of the bar for the U.S. District Court, Northern District of Illinois, including Trial Bar, Central District of Illinois, and Eastern District of Michigan. Mr. Rifkind has argued appeals in the following appellate courts: Fourth Circuit, Seventh Circuit, Sixth Circuit, Eighth Circuit, Eleventh Circuit, Illinois Appellate Court, New York Appellate Division, New Mexico Supreme Court and the Nebraska Supreme Court. He has tried securities, commercial, legal malpractice, contract, civil rights and personal injury cases. Mr. Rifkind graduated from Indiana University's School of Business in 1982, majoring in finance and from Loyola University School of Law in 1985 where he was the recipient of the American Jurisprudence Awards in Evidence and Labor Law. He is the author of "Negligent Misrepresentation in Illinois: The Third Party (Non) Requirement," published at 82 Illinois Bar Journal 668 (1994).

## Regan Karstrand

---

**From:** NYSJ\_ECF\_Pool@nysd.uscourts.gov  
**Sent:** Wednesday, May 06, 2015 3:41 PM  
**To:** CourtMail@nysd.uscourts.gov  
**Subject:** Activity in Case 1:10-cv-03864-AKH Jones et al v. Pfizer, Inc. et al Declaration in Support of Motion

**This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.**

**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

### U.S. District Court

### Southern District of New York

#### Notice of Electronic Filing

The following transaction was entered by Rosen, Henry on 5/6/2015 at 3:41 PM EDT and filed on 5/6/2015

**Case Name:** Jones et al v. Pfizer, Inc. et al  
**Case Number:** [1:10-cv-03864-AKH](#)  
**Filer:** Mary K. Jones  
Stichting Philips Pensioenfonds

**Document Number:** [493](#)

#### Docket Text:

**DECLARATION of Leigh Lasky Filed on Behalf of Lasky & Rifkind, Ltd. in Support re: [482] MOTION for Settlement and Plan of Allocation. MOTION for Attorney Fees and Expenses.. Document filed by Mary K. Jones(Individually), Stichting Philips Pensioenfonds. (Attachments: # (1) Exhibit A)(Rosen, Henry)**

#### 1:10-cv-03864-AKH Notice has been electronically mailed to:

Alexander C Drylewski alexander.drylewski@skadden.com

Amanda M. MacDonald amacdonald@wc.com

Brant Duncan Kuehn brantkuehn@quinnemanuel.com

Charles S. Duggan charles.duggan@dpw.com, ecf.ct.papers@davispolk.com

Cynthia Margaret Monaco cmonaco@cynthiamonacolaw.com, cmmonaco@gmail.com

Daniel Prugh Roeser droeser@goodwinprocter.com

Danielle Suzanne Myers dmyers@rgrdlaw.com

Darren J. Robbins e\_file\_sd@rgrdlaw.com

David Avi Rosenfeld drosenfeld@rgrdlaw.com, e\_file\_ny@rgrdlaw.com, e\_file\_sd@rgrdlaw.com

Donald Alan Migliori dmigliori@motleyrice.com

Eugene Mikolajczyk genem@rgrdlaw.com

Gary John Hacker ghacker@skadden.com

George Anthony Borden gborden@wc.com

Hamilton Philip Lindley hlindley@deanslyons.com

Henry Rosen henryr@rgrdlaw.com, dianah@rgrdlaw.com

Howard E. Heiss hheiss@omm.com, #nymanagingattorney@omm.com

Ivy T. Ngo ingo@rgrdlaw.com, e\_file\_sd@rgrdlaw.com

James M. Hughes jhughes@motleyrice.com, erichards@motleyrice.com, kweil@motleyrice.com, kweil@pacernotice.com, mgruetzmacher@motleyrice.com

James P. Rouhandeh james.rouhandeh@dpw.com, ecf.ct.papers@davispolk.com

James R. Harper coljamesrharper@me.com

Jason A. Forge jforge@rgrdlaw.com, e\_file\_SD@rgrdlaw.com, tholindrake@rgrdlaw.com

Jay B. Kasner jkasner@skadden.com

Jennifer Lynn Spaziano jen.spaziano@skadden.com

Joe Kendall administrator@kendalllawgroup.com, hlindley@kendalllawgroup.com, jkendall@kendalllawgroup.com

John K. Villa jvilla@wc.com

Joseph F. Rice jrice@motleyrice.com

Joseph G. Petrosinelli jpetrosinelli@wc.com

Juliana Newcomb Murray juliana.murray@davispolk.com, ecf.ct.papers@davispolk.com, lisa.hirakawa@davispolk.com

Keir Nicholas Dougall kdougall@dougallpc.com

Kevin Anthony Burke kaburke@sidley.com, efilenotice@sidley.com, nyefiling@sidley.com

Lauren Kristina Collogan lcollogan@wc.com

Leigh R. Lasky lasky@laskyrifkind.com

Lori McGill lorialvinomcgill@quinnemanuel.com

Matthew Melamed mmelamed@rgrdlaw.com

Meghan K. Spillane mspillane@goodwinprocter.com, sewald@goodwinprocter.com,  
ttam@goodwinprocter.com

Michael Barry Carlinsky michaelcarlinsky@quinnemanuel.com, brantkuehn@quinnemanuel.com,  
jomairecrawford@quinnemanuel.com

Michael Joseph Dowd miked@rgrdlaw.com, debg@rgrdlaw.com, e\_file\_sd@rgrdlaw.com,  
tome@rgrdlaw.com

Michael Scott Bailey michael.bailey@skadden.com

Mitchell M.Z. Twersky mtwersky@aftlaw.com

Patrick Daniel Curran patrickcurran@quinnemanuel.com, justinemanzano@quinnemanuel.com

Paul T. Hourihan phourihan@wc.com

Richard Mark Strassberg rstrassberg@goodwinprocter.com, nymanagingclerk@goodwinprocter.com

Ross Bradley Galin rgalin@omm.com, lisachen@omm.com, mochoa@omm.com, neverhart@omm.com

Ryan A. Llorens ryanl@rgrdlaw.com, kirstenb@rgrdlaw.com, nbear@rgrdlaw.com

Samuel Howard Rudman srudman@rgrdlaw.com, e\_file\_ny@rgrdlaw.com, e\_file\_sd@rgrdlaw.com,  
mblasy@rgrdlaw.com

Scott D. Musoff smusoff@skadden.com, aviva.nusbaum@skadden.com

Seema Mittal smittal@wc.com

Sheila L. Birnbaum sheilabirnbaum@quinnemanuel.com

Sidney Bashago sidney.bashago@dpw.com, ecf.ct.papers@davispolk.com, jennifer.kan@davispolk.com

Steven M. Farina sfarina@wc.com

Stuart Michael Sarnoff ssarnoff@omm.com

Theodore J. Pinter tedp@rgrdlaw.com, e\_file\_sd@rgrdlaw.com

Trig Randall Smith   trigs@rgrdlaw.com, e\_file\_sd@rgrdlaw.com, nhorstman@rgrdlaw.com

William E. Schurmann   wschurmann@wc.com

William H. Narwold   bnarwold@motleyrice.com, ajanelle@motleyrice.com, vlepine@motleyrice.com

Willow E. Radcliffe   willowr@rgrdlaw.com, ptiffith@rgrdlaw.com

**1:10-cv-03864-AKH Notice has been delivered by other means to:**

Catherine J. Kowalewski  
Robbins Geller Rudman & Dowd LLP (San Diego)  
655 West Broadway  
Suite 1900  
San Diego, CA 92101

Daniel E. Hill  
Kendall Law Group, LLP  
3232 McKinney Avenue  
Suite 700  
Dallas, TX 75204

David C. Walton  
Robbins Geller Rudman & Dowd LLP (SANDIEGO)  
655 West Broadway  
Suite 1900  
San Diego, CA 92101

Jamie J. McKey  
Kendall Law Group, LLP  
3232 McKinney Avenue  
Suite 700  
Dallas, TX 75204

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1008691343 [Date=5/6/2015] [FileNumber=14664377-0]  
] [431279d701abf976bbbaa87937152a0882efb28f53dd227d799d90ac5a6f562274  
473526d6ff85bbde9b98d4f9816db123eb3d17142afbc0dcef33002b6e658]]

**Document description:**Exhibit A

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1008691343 [Date=5/6/2015] [FileNumber=14664377-1]  
] [4bda53182fb6e9db9a3e905b4f0831e55b2fab663be66782da592f4194aa2d97e89  
17ef2537307c78a4f2e4d8e371cca4618b8de005eae43e447f5c34e39ca17]]