

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARY K. JONES, Individually and on Behalf	:	Civil Action No. 1:10-cv-03864-AKH
of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff	:	
vs.	:	DECLARATION OF MARY K. JONES IN
	:	SUPPORT OF MOTION FOR FINAL
PFIZER INC., et al.,	:	APPROVAL OF CLASS ACTION
	:	SETTLEMENT AND AWARD OF
Defendants.	:	ATTORNEYS' FEES AND EXPENSES
	:	PURSUANT TO 15 U.S.C. §78u-4(a)(4)
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1. I, Mary K. Jones, purchased 500 shares of Pfizer Inc. (“Pfizer” or the “Company”) common stock on September 18, 2007 for the Mary K. Jones Revocable Trust (the “Trust”). I am the beneficiary of the Trust. I live in Fayetteville, Arkansas. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

2. During the period 2007 through 2009, I personally monitored my investment in Pfizer by reviewing the price of the Company’s stock and prior to my purchase of Pfizer stock, its income statement. As a retiree, my investment was important to me. In 2010, I worked with the Kendall Law Group, LLP (“Kendall”) and Robbins Geller Rudman & Dowd LLP (“Robbins Geller”) to file a complaint against Pfizer and certain of its officers alleging securities fraud concerning the failure to disclose Pfizer’s off-label promotional practices and impact on the Company as a result. My understanding is that I was the first person to file such a complaint against Pfizer. On March 29, 2012, this Court appointed me, individually and as the Trustee of the Trust, as a class representative to represent the Class in this case.

3. I respectfully submit this Declaration in support of: (a) final approval of the settlement in the Litigation, which was fully documented in the Stipulation of Settlement, dated February 8, 2015; and (b) approval of plaintiffs’ counsel’s application for an award of attorneys’ fees and expenses and for a personal award of \$300 for my time incurred in representing the Class.

4. Throughout the course of this Litigation, I actively participated in the prosecution of the case. Among other things, I engaged in the following activities: (a) selected the Kendall and Robbins Geller firms as counsel; (b) engaged in meetings and conference calls with counsel from Kendall and Robbins Geller with respect to the prosecution of the action; (c) remained fully informed regarding case developments and the procedural status; (d) met with my attorneys to be apprised of the case and to prepare for any deposition; (e) sat for a deposition on December 15, 2011

in the case; (f) monitored and remained informed about the mediation session in 2013; (g) postponed a surgical procedure scheduled for late January 2015 so that I would be able to attend the trial and testify on behalf of the Class; and (h) discussed the proposed settlement with my attorneys in late January 2015 and concluded that the proposed settlement was in the best interests of the Class.

5. After seriously considering the grounds of the proposed settlement, as well as the risks and uncertainties associated with continued litigation, including the trial and appeal (if we won), I authorized Lead Counsel to settle this action for \$400,000,000. I believe the settlement represents a very good recovery that would not have been possible without the diligent efforts of Lead Counsel, who aggressively litigated this case for over four years. I believe this settlement represents a fair, reasonable and adequate recovery on behalf of the Class and that its approval is in the best interest of each Class Member.

6. While I recognize that any determination of fees and expenses is ultimately left to the Court, I approve the request for a 23.5% attorneys' fees award plus expenses incurred by plaintiffs' counsel in litigating this case.

7. I understand that the Court may award reasonable costs and expenses (including lost wages) to representatives serving on behalf of the Class, directly relating to the representation of the Class. I am requesting the amount of \$300 in connection with my service as a class representative. Although I have been retired for many years, I believe that a person with my experience as a clerk at several corporations, such as Southern Bell and Continental Insurance, would presently earn at least \$15 per hour. Including meeting with my attorneys to prepare for my deposition, sitting for a deposition and my other efforts to stay informed about the case and discuss the settlement negotiations, I believe that I spent at least 20 hours undertaking my responsibilities.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this ~~8th~~ day of April, 2015 at Fayetteville, Arkansas.

Mary K Jones

MARY K. JONES

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

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Southern District of New York

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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: [488](#)

Docket Text:

DECLARATION of Mary K. Jones 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. (Rosen, Henry)

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