

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PFIZER INC. SECURITIES LITIGATION

No. 04-cv-9866 (LTS)(HBP)

ECF CASE

**LEAD COUNSEL'S NOTICE OF MOTION AND MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES**

PLEASE TAKE NOTICE that, pursuant to the Court's September 16, 2016 Order Preliminarily Approving Settlement, Directing Notice to Class Members, and Setting Hearing for Final Approval of Settlement (ECF No. 703, the "Preliminary Approval Order"), on December 21, 2016, at 10:00 a.m. in Courtroom 12D of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, the Honorable Laura Taylor Swain presiding, Lead Counsel, Grant & Eisenhofer P.A., on behalf of itself and other Plaintiffs' Counsel in this Action, and with the approval and support of Lead Plaintiff Teachers' Retirement System of Louisiana ("Lead Plaintiff" or "TRSL") and the other Court-appointed Class Representatives in this Action, will and hereby does, move for an award of attorneys' fees and reimbursement of litigation expenses to Plaintiffs' Counsel and reimbursement of Class Representatives' expenses pursuant to the Private Securities Litigation Reform Act of 1995.

This Motion is based upon the Memorandum of Law in Support of Motion For An Award of Attorneys' Fees and Reimbursement of Expenses, the Declaration of Charles T. Caliendo In Support of Motion For Final Approval of Class Action Settlement and Plan of Allocation, and Motion For An Award of Attorneys' Fees and Reimbursement of Expenses ("Caliendo Decl."),¹ the exhibits thereto, the record and proceedings in this Action, and such other matters as the Court may consider at the time of the hearing.

Certification Pursuant to Individual Practices

Pursuant to Section A(2)(b)(ii) of the Individual Practices of Judge Laura Taylor Swain (effective for all cases on or after September 14, 2015), Lead Plaintiff, by and through Lead Counsel, certifies that it is aware of objections to this Motion. The deadline for Class Members

¹ All initial capitalized terms not defined herein have the meanings as defined in the Caliendo Decl. and the Stipulation and Agreement of Settlement dated August 26, 2016 (*see* ECF No. 700, Ex. 1).

to file objections is November 28, 2016. As of November 10, 2016, out of the millions of Notices mailed, there have been 10 objections submitted in connection with the Settlement. Caliendo Decl. ¶120. As provided in the Preliminary Approval Order, and in the interests of judicial economy, Lead Counsel will file reply papers on December 6, 2016 that will address all objections received. ECF 703, ¶ 15.

Dated: November 11, 2016

Respectfully submitted,

GRANT & EISENHOFER P.A.

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