

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

In re: MIRAPEX PRODUCTS LIABILITY  
LITIGATION

MDL No. 07-1836 (MJD/FLN)

This Document Relates to:

KATHRYN GILLETTE and  
RAIF SZCZEPANSKI

Civil No. 15-CV-3005 (MJD/FLN)

Plaintiffs,

**DEFENDANTS PFIZER INC.,  
PHARMACIA CORPORATION AND  
PHARMACIA & UPJOHN LLC'S  
MOTION FOR SUMMARY  
JUDGMENT**

v.

BOEHRINGER INGELHEIM  
PHARMACEUTICALS, INC., PFIZER  
INC., PHARMACIA CORPORATION,  
and PHARMACIA & UPJOHN LLC,

Defendants.

Defendants Pfizer Inc., Pharmacia Corporation and Pharmacia & Upjohn LLC (collectively "Pfizer"), by and through its counsel, hereby move this Court pursuant to Rule 56 of the Federal Rules of Civil Procedure for an Order granting them judgment in its favor and against Plaintiffs on all counts of Plaintiffs' Amended Complaint. Pfizer submits that, as a matter of law, Plaintiffs cannot sustain their burden of proving that their alleged injuries were proximately caused by a product that Pfizer is alleged to have manufactured, sold, or otherwise put into the stream of commerce.

This Motion is supported by an accompanying Memorandum of Law; the Declaration of Seema Divan, with attached exhibits; all prior and concurrent filings with the Court in this matter, including the Motion for Summary Judgment and supporting documentation submitted

by co-defendant Boehringer Ingelheim Pharmaceuticals Inc.; and, the arguments of the parties and counsel.

Dated: March 1, 2016

Respectfully submitted,

**KAYE SCHOLER LLP**

By:     /s/ Lori B. Leskin      
Lori B. Leskin (*Pro Hac Vice*)

250 West 55th Street  
New York, NY 10019-9710  
Phone: (212) 836-8000  
Lori.Leskin@kayescholer.com

Joseph M. Price (#88201)  
FAEGRE BAKER DANIELS LLP  
2200 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402-3905  
Phone: (612) 766-7000  
jprice@faegrebd.com

**ATTORNEYS FOR DEFENDANTS PFIZER  
INC., PHARMACIA LLC (f/k/a PHARMACIA  
CORPORATION); PHARMACIA & UPJOHN  
COMPANY LLC**

**CERTIFICATE OF SERVICE**


I hereby certify that a copy of the foregoing was sent via first-class mail this 1<sup>st</sup> day of  
March, 2016, to the following:

Kathryn Gillette  
Raif Szczepanski  
8335 Catamaran Drive  
Indianapolis, IN 46236

*Pro Se Plaintiffs*

I certify that on March 1<sup>st</sup>, 2016, a copy of the foregoing was served electronically on  
counsel of record for all parties through the Court's CM/ECF system.

Dated: March 1, 2016



Lori B. Leskin  
*Counsel for Pfizer Inc.*