

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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IN RE NEURONTIN MARKETING AND )	MDL Docket No. 1629
SALES PRACTICES LITIGATION )	
_____ )	Judge Patti B. Saris
THIS DOCUMENT RELATES TO: )	
Harden Manufacturing Corp. v. Pfizer, Inc., et al )	Civil Action No. 04-10981
_____ )	
The Guardian Life Ins. Co. v. Pfizer, Inc., et al. )	Civil Action No. 04-10739
_____ )	
Aetna, Inc. v. Pfizer, Inc., et al. )	Civil Action No. 04-10958
_____ )	
Teamsters Health & Welfare Fund of Philadelphia )	Civil Action No. 04-10984
and Vicinity v. Pfizer, Inc., et al )	
_____ )	
Emma B. Christina v. Pfizer, Inc., et al )	Civil Action No. 04-1450
_____ )	
Debra Mull v. Pfizer, Inc., et al. )	Civil Action No. 04-1489
_____ )	
Annie D. Blevins v. Pfizer, Inc., et al. )	Civil Action No. 6:04-1162
_____ )	
ASEA/AFSCME Local 52 Health Benefits Trust )	Civil Action No.04-02577
and Brian Krah v. v. Pfizer, Inc., et al. )	
_____ )	
Maggie Dorty v. Pfizer, Inc., et al. )	Civil Action No. 04-1547
_____ )	
Dianne Hood v. Pfizer, Inc., et al )	Civil Action No. 04-1575
_____ )	
Joyce B. Duhe v. Pfizer, Inc., et al. )	Civil Action No.04-1591
_____ )	

Tammylee Willoz v. Pfizer, Inc., et al	)	Civil Action No. 04-1234
Gulf Distributing Holdings, LLC v. Pfizer, Inc., et al.	)	Civil Action No. 04-0403
Mary Jane Gordon v. Pfizer, Inc., et al.	)	Civil Action No. 04-552
Lorraine Kopa v. Pfizer, Inc., et al	)	Civil Action No. 04-4593
Julie K. Bakle v. Pfizer, Inc., et al.	)	Civil Action No. 2:04-2935
Patricia Ann White v. Pfizer, Inc., et al.	)	Civil Action No. 04-1712
Sylvia G. Hyman v. Pfizer, Inc., et al.	)	Civil Action No. 3:04-215
Mary Lou Lienerth v. Pfizer, Inc., et al.	)	Civil Action No. 04-1161
Brenda Straddeck v. Pfizer, Inc., et al.	)	Civil Action No. 04-4106
Claudia Lang v. Pfizer, Inc., et al.	)	Civil Action No. 5:04-234
Johnny Ray Meeks, et al. v. Pfizer, Inc., et al.	)	Civil Action No. 04-1781
Gerald Smith v. Pfizer, Inc., et al.	)	Civil Action No. 1:04-1052
John Lerch v. Pfizer, Inc., et al.	)	Civil Action No. 0:04-3021
James Hope v. Pfizer, Inc., et al.	)	Civil Action No. 5:04-248
Clifford Eckenrode v. Pfizer, Inc., et al.	)	Civil Action No. 3:04-240

\_\_\_\_\_) )  
James Doyle v. Pfizer, Inc., et al. ) Civil Action No. 2:04-2509  
\_\_\_\_\_)

**PLAINTIFFS' MOTION FOR APPOINTMENT OF COUNSEL  
TO PLAINTIFFS' STEERING COMMITTEE**

NOW COME the Plaintiffs in the above-referenced matters and move this Court for appointment of certain Plaintiffs' counsel as Plaintiffs' Liaison Counsel, Class Plaintiffs' Steering Committee Members and Plaintiffs' Non-Class Steering Committee Members, as further outlined below;

WHEREAS, on November 23, 2004, this Court conducted an initial status conference during which, in part, the Court directed that the parties file a proposed order on or before December 15, 2004 dealing, *inter alia*, with the structure and organization of Plaintiffs' counsel; and

WHEREAS, the parties have contemporaneously filed herewith a [Proposed] Case Management Order.

ACCORDINGLY, the undersigned Plaintiffs' counsel seek appointment as Plaintiffs' Liaison Counsel, Class Plaintiffs' Steering Committee Members and Plaintiffs' Non-Class Steering Committee Members, with the duties and responsibilities outlined in Section III (Organization of Counsel) of the [Proposed] Case Management Order, as indicated below:

1. As Plaintiffs' Liaison Counsel:

Thomas M. Sobol, Esquire  
Hagens Berman LLP  
One Main Street, 4<sup>th</sup> Floor  
Cambridge, MA 02142  
617-482-3700  
617-482-3003  
(Qualifications attached hereto at Exhibit A)

2. As Class Plaintiffs' Steering Committee Members:

Don Barrett, Esquire  
Barrett Law Office  
404 Court Square North  
P.O. Box 987  
Lexington, MS 39095  
(Qualifications attached hereto at Exhibit B)

Daniel Becnel, Jr., Esquire  
Law Offices of Daniel Becnel, Jr.  
106 W. Seventh Street  
P.O. Drawer H  
Reserve, LA 70084  
(Qualifications attached hereto at Exhibit C)

James Dugan, Esquire  
Dugan & Browne  
650 Poydras St., Suite 2150  
New Orleans, LA 70130  
(Qualifications attached hereto at Exhibit D)

Thomas Greene, Esquire  
Greene & Hoffman  
125 Summer Street  
Boston, MA 02110  
(Qualifications attached hereto at Exhibit E)

Thomas M. Sobol, Esquire  
Hagens Berman LLP  
One Main Street, 4<sup>th</sup> Floor  
Cambridge, MA 02142  
(Qualifications attached hereto at Exhibit A)

Barry Himmelstein, Esquire  
Lieff Cabraser Heimann & Bernstein  
Embarcadero Center West  
275 Battery Street, 30<sup>th</sup> Floor  
San Francisco, CA 94111-3339  
(Qualifications attached hereto at Exhibit F)

3: As Plaintiffs' Non-Class Steering Committee Members:

Linda P. Nussbaum, Esquire  
Cohen Milstein Hausfeld & Toll P.L.L.C  
150 East 52<sup>nd</sup> Street  
Thirteenth Floor  
New York, NY 10022  
(Qualifications attached hereto at Exhibit G)

Richard Cohen, Esquire  
Lowey Dannenberg Bemporad & Selinger, P.C.  
The Gateway  
One North Lexington Avenue  
White Plains, NY 10601  
(Qualifications attached hereto at Exhibit H)

A declaration in support of each counsel's requested appointment, along with information concerning their firm and its qualifications, are attached hereto as exhibits, as indicated above.

Dated: December 15, 2004

Respectfully Submitted,

***Proposed Plaintiffs' Liaison counsel***

By: /s/ **Thomas M. Sobol**  
Thomas M. Sobol  
Hagens Berman LLP  
One Main Street, 4<sup>th</sup> Floor  
Cambridge, MA 02142

***Proposed Members of the  
Class Plaintiffs' Steering Committee***

By: /s/ **Don Barrett**  
Don Barrett, Esquire  
Barrett Law Office  
404 Court Square North  
P.O. Box 987  
Lexington, MS 39095

By: /s/ **Daniel Becnel**  
Daniel Becnel, Jr., Esquire  
Law Offices of Daniel Becnel, Jr.  
106 W. Seventh Street  
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Reserve, LA 70084

By: /s/ **James Dugan**  
James Dugan, Esquire  
Dugan & Browne  
650 Poydras St., Suite 2150  
New Orleans, LA 70130

By: /s/ **Thomas Greene**  
Thomas Greene Esquire  
Greene & Hoffman  
125 Summer Street  
Boston, MA 02110

By: /s/ Barry Himmelstein  
Barry Himmelstein, Esquire  
Lieff Cabraser Heimann & Bernstein  
Embarcadero Center West  
275 Battery Street, 30<sup>th</sup> Floor  
San Francisco, CA 94111-3339

***Proposed Members of the  
Plaintiffs' Non-Class Steering Committee***

By: /s/ Richard Cohen  
Richard Cohen, Esquire  
Lowey Dannenberg Bemporad  
& Selinger, P.C.  
The Gateway  
One North Lexington Avenue  
White Plains, NY 10601

By: /s/ Linda P. Nussbaum  
Linda P. Nussbaum, Esquire  
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