

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**IN RE: ZANTAC (RANITIDINE)  
PRODUCTS LIABILITY  
LITIGATION**

**MDL No. 2924  
20-MD-2924**

**JUDGE ROBIN L. ROSENBERG  
MAGISTRATE JUDGE BRUCE E. REINHART**

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**THIS DOCUMENT RELATES TO: ALL CASES**

**ANSWER AND AFFIRMATIVE DEFENSES OF PFIZER INC.**

Defendant Pfizer Inc. (“Pfizer”) respectfully submits this Answer and Affirmative Defenses (“Answer”) to Plaintiffs’ Second Amended Master Personal Injury Complaint (“SAMPIC”).

### **PRELIMINARY STATEMENT**

The following matters are incorporated by reference into Pfizer’s responses to each paragraph of the SAMPIC.

A. Pfizer is submitting this Answer only on behalf of itself. Where allegations are made against “Defendants” as a group, however described, Pfizer’s responses apply only to itself.

B. The SAMPIC contains purported references to documents and third-party publications and statements that have often been excerpted, paraphrased, mischaracterized, and otherwise taken out of context. These documents and third-party publications and statements should be considered, if at all, in context and in unmodified form, and Pfizer respectfully refers the Court to the respective documents for their accurate and complete contents.

C. Except as expressly stated herein, Pfizer denies each and every allegation contained in the SAMPIC, including without limitation any allegations contained in the preamble, titles, unnumbered paragraphs, headings, subheadings, table of contents, and footnotes of the SAMPIC, and specifically denies any liability to Plaintiffs.

D. Pfizer reserves the right to seek to amend and supplement this Answer as may be appropriate or necessary.

## **SPECIFIC RESPONSES TO PLAINTIFFS' COMPLAINT**

In this section, Pfizer adopts the paragraph numbering of the SAMPIC. The Plaintiffs' section headings in the SAMPIC are repeated in bold for ease of reference. To the extent that the preamble, titles, unnumbered paragraphs, headings, subheadings, table of contents, and footnotes of the SAMPIC are intended to be allegations directed to Pfizer, they are, unless specifically admitted, denied.

### **INTRODUCTION**

1. Pfizer admits only that the active ingredient in branded Zantac is ranitidine, which is an H2 receptor antagonist. Except as specifically admitted herein, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.
2. Pfizer admits only that during the time that Pfizer marketed over-the-counter ("OTC") Zantac, the medication was taken safely by millions of people. All other allegations in this paragraph are denied.
3. Pfizer denies each and every allegation in this paragraph.
4. Pfizer admits only that the FDA has set an allowable daily limit of NDMA of 96 nanograms. All other allegations in this paragraph are denied.
5. Pfizer denies each and every allegation in this paragraph.
6. Pfizer denies each and every allegation in this paragraph.
7. Pfizer denies each and every allegation in this paragraph.

8. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

9. Pfizer admits only that companies that develop new medications may be afforded certain protections by the United States' legal and regulatory systems. Responding further, the allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

10. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

11. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

12. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

13. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or

information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

14. Pfizer denies each and every allegation in this paragraph.

## **PARTIES**

### **PLAINTIFFS**

15. This paragraph purports to refer to the SAMPIC and the Court's Orders which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize the SAMPIC or the Court's Orders by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations contained in this paragraph are otherwise denied.

16. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

17. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

### **DEFENDANTS**

18. Pfizer admits that from 1993 to 1998, Warner-Lambert was part of a joint venture with Glaxo Wellcome that marketed an OTC version of Zantac; that from 1998 to 2000 Warner-Lambert held the marketing rights to OTC Zantac in North America; that Pfizer became the successor-in-interest to Warner-Lambert in 2000; and that Pfizer held the North American marketing rights to OTC Zantac from 2000 to 2006. Except as specifically admitted herein, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a

response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**Boehringer Ingelheim (BI)**

19. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

20. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

21. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

22. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

23. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

24. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**GlaxoSmithKline (GSK)**

25. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

26. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

27. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

28. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

### **Pfizer**

29. Pfizer admits only that it is registered in Delaware and that its principal place of business is in New York. The remaining allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the remaining allegations in this paragraph require a response, Pfizer denies that the allegations of the SAMPIC are sufficient on their own to establish jurisdiction under 28 U.S.C. § 1332. Plaintiffs can only establish jurisdiction under 28 U.S.C. § 1332 by pleading facts in a Short Form Complaint that show diversity of citizenship.

### **Sanofi**

30. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

31. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

32. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

33. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or



information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

34. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

35. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

36. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

37. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent a response is required, Pfizer admits only that from 1993 to 1998, Warner-Lambert was part of a joint venture with Glaxo Wellcome that marketed an OTC version of Zantac; that from 1998 to 2000 Warner-Lambert held the marketing rights to OTC Zantac in North America; that Pfizer became the successor-in-interest to Warner-Lambert in 2000; and that Pfizer held the North American marketing rights to OTC Zantac from 2000 to 2006. Except as specifically admitted herein, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or

information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

### **JURISDICTION & VENUE**

38. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

39. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

40. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

41. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

42. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, Pfizer denies that the allegations in the SAMPIC are sufficient on their own to establish personal jurisdiction over Pfizer. Plaintiffs can only establish personal jurisdiction over Pfizer by pleading sufficient case-specific facts in a Short Form Complaint. Pfizer otherwise denies the allegations in this paragraph.

43. Pfizer admits only that from 1993 to 1998, Warner-Lambert was part of a joint venture with Glaxo Wellcome that marketed an OTC version of Zantac; that from 1998 to 2000 Warner-

Lambert held the marketing rights to OTC Zantac in North America; that Pfizer became the successor-in-interest to Warner-Lambert in 2000; and that Pfizer held the North American marketing rights to OTC Zantac from 2000 to 2006. Except as specifically admitted herein, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

44. Pfizer admits only that from 1993 to 1998, Warner-Lambert was part of a joint venture with Glaxo Wellcome that marketed an OTC version of Zantac; that from 1998 to 2000 Warner-Lambert held the marketing rights to OTC Zantac in North America; that Pfizer became the successor-in-interest to Warner-Lambert in 2000; and that Pfizer held the North American marketing rights to OTC Zantac from 2000 to 2006. Except as specifically admitted herein, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

45. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, Pfizer denies that the allegations in the SAMPIC are sufficient on their own to establish personal jurisdiction over Pfizer. Plaintiffs can only establish personal jurisdiction over Pfizer by pleading sufficient case-specific facts in a Short Form Complaint. Pfizer otherwise denies the allegations in this paragraph.

46. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

## **FACTUAL ALLEGATIONS**

### **I. THE CREATION OF RANITIDINE-CONTAINING PRODUCTS AND THEIR INTRODUCTION TO THE MARKET**

47. Pfizer admits only that from 1993 to 1998, Warner-Lambert was part of a joint venture with Glaxo Wellcome that marketed an OTC version of Zantac; that from 1998 to 2000 Warner-Lambert held the marketing rights to OTC Zantac in North America; that Pfizer became the successor-in-interest to Warner-Lambert in 2000; and that Pfizer held the North American marketing rights to OTC Zantac from 2000 to 2006. Except as specifically admitted herein, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

48. Admitted.

49. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

50. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

51. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

52. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

53. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph purports to refer to NDA 18-703, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize NDA 18-703 by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations contained in this paragraph are otherwise denied.

54. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

55. The allegations in this paragraph are not directed at Pfizer, which never held the rights to prescription Zantac, and therefore require no response from Pfizer. To the extent a response is

required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

56. Pfizer admits only that in 1993 Glaxo Wellcome and Warner-Lambert formed a joint venture to market an OTC version of Zantac. Pfizer further states that this paragraph purports to refer to the cited documents, NDA 20-520, and NDA 20-745, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize these documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations contained in this paragraph are otherwise denied.

57. Pfizer admits only that Glaxo Wellcome and Warner-Lambert ended their joint venture in 1998 and that, at that time, Warner-Lambert assumed the marketing rights for OTC Zantac in North America. Pfizer further states that this paragraph purports to refer to partnership agreements, trademark agreements, and cited documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize these documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations contained in this paragraph are otherwise denied.

58. Pfizer admits only that from 2000 until 2006 it held the marketing rights to OTC Zantac in North America. Pfizer further states that this paragraph purports to refer to the NDAs, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize these documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations contained in this paragraph are otherwise denied.

59. Pfizer admits only that from 2000 until 2006 it held the marketing rights to OTC Zantac in North America. Pfizer further states that this paragraph purports to refer to “a divestiture and transfer agreement,” which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that document by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations contained in this paragraph are otherwise denied.

60. This paragraph refers to NDA 21-698 and related FDA correspondence, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations contained in this paragraph are otherwise denied.

61. Pfizer admits only that for some period GlaxoSmithKline LLC or related entities manufactured OTC Zantac for Pfizer and its predecessor-in-interest Warner-Lambert. The allegations contained in this paragraph are otherwise denied.

62. Pfizer admits only that in 2006 its Consumer Healthcare division was divested to Johnson & Johnson and that the rights to OTC Zantac transferred to Boehringer Ingelheim Pharmaceuticals, Inc. Pfizer further states that this paragraph refers to a “Stock and Asset Purchase Agreement,” which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that document by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations contained in this paragraph are otherwise denied.

63. Pfizer admits only that in 2006 the rights to OTC Zantac transferred to Boehringer Ingelheim Pharmaceuticals, Inc. Pfizer further states that this paragraph refers to a “divestiture

agreement,” which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that document by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations contained in this paragraph are otherwise denied.

64. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

65. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

66. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

67. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

68. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or



information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

69. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

70. Pfizer admits that it has made an indemnification demand to J&J under the Stock and Asset Purchase Agreement. The Stock and Asset Purchase Agreement referenced in this paragraph speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that document by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. Responding further, to the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

71. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

72. Pfizer admits only that from 1993 to 1998, Warner-Lambert was part of a joint venture with Glaxo Wellcome that marketed an OTC version of Zantac; that from 1998 to 2000 Warner-Lambert held the marketing rights to OTC Zantac in North America; that Pfizer became the successor-in-interest to Warner-Lambert in 2000; and that Pfizer held the North American

marketing rights to OTC Zantac from 2000 to 2006. The allegations contained in this paragraph are otherwise denied.

## **II. NDMA IS A CARCINOGEN WHOSE DANGEROUS PROPERTIES ARE WELL ESTABLISHED**

73. This paragraph refers to cited publications by the EPA and Jane Brody, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

74. This paragraph refers to cited publications by the EPA and IARC, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

75. This paragraph refers to cited IARC statements and underlying data, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those statements or data by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

76. This paragraph refers to the cited information published by the EPA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that information by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

77. This paragraph refers to cited statements and “findings” by the DHHS, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those statements and “findings” by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

78. This paragraph refers to cited information published by FDA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that information by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

79. This paragraph refers to cited information published by the WHO, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize those statements by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

80. This paragraph refers to a regulation promulgated by the state of California and the corresponding Proposition, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those statements by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

81. This paragraph refers to the cited information published by the European Medicines Agency, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize those statements by selectively quoting, omitting, and/or emphasizing certain

language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

82. This paragraph refers to the cited information published by the Agency for Toxic Substances and Disease Registry, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize those statements by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

83. This paragraph refers to the cited information published by the International Register of Potentially Toxic Chemicals (IRPTC 1988), which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that information by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

84. This paragraph refers to the cited information published by OSHA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that information by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

85. Pfizer denies each and every allegation in this paragraph. This paragraph refers generally and without citation to “Defendants’ own internal documents,” which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

86. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited GSK document, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that document by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

87. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

88. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain

language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

89. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

90. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited Dr. Reddy's documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

The allegations in this paragraph are otherwise denied.

91. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited Dr. Reddy's documents, which speak for themselves. To the extent the allegations contained in this

paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

The allegations in this paragraph are otherwise denied.

92. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited Apotex documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

The allegations in this paragraph are otherwise denied.

93. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited Glenmark documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

The allegations in this paragraph are otherwise denied.

94. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited Lannett

documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

The allegations in this paragraph are otherwise denied.

95. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited Wockhardt documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

The allegations in this paragraph are otherwise denied.

96. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited Aurobindo documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

The allegations in this paragraph are otherwise denied.

97. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or



information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

98. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

99. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

100. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

101. Pfizer admits only that the FDA has set an allowable daily limit of NDMA of 96 nanograms. All other allegations in this paragraph are denied. Responding further, this paragraph refers to cited statements by the FDA, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those statements by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

102. This paragraph refers to uncited animal studies, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those studies by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

103. This paragraph refers to uncited animal studies, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those studies by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

104. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

105. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

106. This paragraph refers to a cited EPA publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

107. This paragraph refers to in vitro studies, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those studies by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

108. This paragraph refers to uncited animal studies, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those studies by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

109. This paragraph refers to the cited EPA publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively

quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

110. This paragraph refers to the cited EPA publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

111. This paragraph refers to uncited human and animal studies, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those studies by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

112. This paragraph refers to the cited Pobel publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

113. This paragraph refers to the cited La Vecchia publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

114. This paragraph refers to the cited Rogers publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

115. This paragraph refers to the cited Knekt publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

116. This paragraph refers to the cited Straif publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

117. This paragraph refers to the cited Loh publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

118. This paragraph refers to the cited Zhu publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

119. This paragraph refers to uncited in vivo and in vitro studies as well as to the cited publication by the World Health Organization, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize that publication or those studies by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

120. This paragraph refers to uncited studies, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those studies by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

### **III. NDMA IS DISCOVERED IN RANITIDINE-CONTAINING PRODUCTS, LEADING TO MARKET WITHDRAWAL**

121. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the Valisure study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that document by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

122. This paragraph refers to the cited statement by Dr. Janet Woodcock of FDA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

123. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to a statement published by FDA, which speaks for itself. To the extent the allegations contained in this paragraph

mischaracterize that statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

124. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited statements published by FDA, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those statements by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

125. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to an uncited statement by CVS, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

126. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to a statement published by

FDA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

127. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to statements by GSK, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those statements by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

128. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to a cited statement by FDA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

129. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and,

therefore, denies the same. Responding further, this paragraph refers to a cited statement by FDA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

130. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to a cited statement by FDA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

131. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to a cited statement by FDA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

132. This paragraph refers to a cited publication by FDA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively



quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

133. This paragraph refers to a cited statement by FDA and to a cited publication by Dr. De Flora, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize that statement and publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

134. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to a cited statement by FDA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

135. This paragraph refers to a publication by Emery Pharma, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

136. This paragraph refers to a cited publication by Emery Pharma, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related

inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

137. This paragraph refers to the cited FDA correspondence, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that correspondence by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

138. This paragraph refers to cited publications, statements, and testing by FDA, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those publications, statements, or testing by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

139. This paragraph refers to a publication by Newkirk and Berfield, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

140. This paragraph refers to a publication by the EMA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

141. This paragraph refers to a publication by the EMA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively

quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

#### **IV. HOW RANITIDINE TRANSFORMS INTO NDMA**

142. Pfizer denies Plaintiffs' characterization and depiction of the ranitidine molecule. The allegations in this paragraph are otherwise denied.

143. Pfizer denies each and every allegation in this paragraph.

144. This paragraph refers to the cited publications by Ogawa and Mitch, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those publications by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

145. Pfizer denies each and every allegation in this paragraph.

146. Pfizer denies each and every allegation in this paragraph.

147. This paragraph refers to the cited publication by Dr. de Flora and to the FDA approval of Zantac and the Zantac NDA, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

148. This paragraph refers to the publications by Dr. De Flora and Brittain, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those publications by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

149. This paragraph refers to the cited publication by Edwards, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

150. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to a cited publication by the Senate Committee on Finance, a publication by the U.S. Department of Justice, and a Sanofi webpage, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those publications or that webpage by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

151. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

152. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or

information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

153. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to a Summary Basis of Approval, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that document by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

154. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to a Summary Basis of Approval, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that document by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

155. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to a Summary Basis of Approval, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that document by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

156. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited Thomas study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that document by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

157. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

158. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and,

therefore, denies the same. Responding further, this paragraph refers to a Maura study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that document by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

159. This paragraph refers to cited studies by Dr. de Flora and studies by GSK, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those studies by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

160. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

161. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited documents, which speak for themselves. To the extent the allegations contained in this paragraph

mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

162. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

163. This paragraph refers to a cited study by LeRoux, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

164. This paragraph refers to a cited study by Krawczynski, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

165. Pfizer denies each and every allegation in this paragraph as to itself. To the extent the allegations in this paragraph are not directed at Pfizer, no response from Pfizer is required. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a



belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

166. This paragraph refers to a cited study by Zeng, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

167. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

168. This paragraph refers to the cited studies by Valisure and FDA, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those studies by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

169. This paragraph refers to the cited study by Valisure, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

170. This paragraph refers to the cited study by Valisure, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

171. This paragraph refers to the cited study by Valisure, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively

quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

172. This paragraph refers to the cited marketing materials, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those materials by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

173. This paragraph refers to the cited study by Valisure, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

174. Pfizer denies each and every allegation in this paragraph.

175. This paragraph refers to the cited study by FDA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

176. This paragraph refers generally to uncited literature and data, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize that literature and data by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

177. This paragraph refers to the cited study by Valisure, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively

quoting, omitting, and/or emphasizing certain language, they are denied. The allegations in this paragraph are otherwise denied.

178. This paragraph refers to the cited study by Valisure, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language, they are denied. The allegations in this paragraph are otherwise denied.

179. This paragraph refers to the cited study by Valisure, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

180. This paragraph refers to the cited study by Valisure, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

181. This paragraph refers to the cited information published by the National Center for Biotechnology Information, including Figure 3, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that information by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

182. This paragraph refers to the cited information published by Valisure, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that information by selectively quoting, omitting, and/or emphasizing certain language or by drawing related

inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

183. This paragraph refers to the cited study published by Stanford, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

184. This paragraph refers to uncited early studies, a study by GSK, and a study by Valisure, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those studies by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

185. This paragraph refers to a statement made by FDA, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

186. This paragraph refers to the cited study published by Emery Pharma, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

187. This paragraph refers to the cited study published by Emery Pharma, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related

inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

188. This paragraph refers to statements by the FDA, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those statements by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

189. This paragraph refers to statements by the FDA and to the cited study by Woodcock, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those statements or that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

190. This paragraph refers to statements by the FDA and other regulatory authorities, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. Responding further, the allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

191. This paragraph refers to statements by the FDA and a study by Valisure, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those statements or that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. Responding further,

the allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

192. This paragraph refers to the cited GSK documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. Responding further, the allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

193. This paragraph refers to the cited Sanofi documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. Responding further, the allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

194. This paragraph refers to the cited Sanofi documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or

stating related opinions, they are denied. Responding further, the allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

195. The allegations in this paragraph are denied as to Pfizer. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

196. The allegations in this paragraph are denied as to Pfizer. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

Responding further, this paragraph refers to the cited Sanofi, GSK, and Dr. Reddy's documents, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

## **V. EVIDENCE DIRECTLY LINKS RANITIDINE EXPOSURE TO CANCER**

197. This paragraph refers to uncited studies, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those studies by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

198. This paragraph refers to the cited Michaud study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

199. This paragraph refers to the cited Mathes study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

200. This paragraph refers to the cited Habel study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

201. This paragraph refers to the cited Tran study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

202. This paragraph refers to the cited Shao study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

203. This paragraph refers to the cited studies by Mathes, Ahn, Lai, Poulsen, Wennerstrom, and Adamson, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those studies by selectively quoting, omitting, and/or emphasizing



certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

## **VI. DEFENDANTS KNEW OR SHOULD HAVE KNOWN OF THE NDMA RISK**

204. This paragraph refers to the cited de Flora study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

205. This paragraph refers to the cited GSK study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. Responding further, the allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

206. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited de Flora study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

207. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to the cited Thomas study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

#### **THE FEDERAL REGULATORY LANDSCAPE**

208. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **I. DEFENDANTS MADE FALSE STATEMENTS IN THE LABELING OF RANITIDINE-CONTAINING PRODUCTS**

209. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 201.5 and 201.15, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those provisions by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

210. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 65 Fed. Reg. 14286, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by

selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

211. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to *United States v. Research Labs.*, 126 F.2d 42, 45 (9th Cir. 1942), which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that case by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

212. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 211.166(a), which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

213. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 211.166(a), 211.137(a) and 211.137(b) which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those provisions by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

214. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

215. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 43 Fed. Reg. 45059, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

216. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 211.166(b), which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

217. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 211.166(b), 314.70, and 314.71 which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those provisions by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

218. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 314.70(b), which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by

selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

219. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 314.70(c)(3) and (c)(6) which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those provisions by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

220. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 314.70(c)(6)(I) and 65 Fed. Reg. 83042 (Dec. 29, 2000) which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those provisions by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

221. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 211.137(a), which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

222. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are

denied. Responding further, this paragraph refers to 21 CFR 314.70(c)(6)(ii)(A), (C), and (D) which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those provisions by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

223. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 314.70(d)(2)(ix) which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

224. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 314.70(d)(2)(vi), (vii), and (x) which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those provisions by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied.

225. This paragraph refers to the FDA-approved labeling for Zantac, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that labeling by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. Responding further, to the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a

belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

226. This paragraph refers to the FDA-approved labeling for Zantac, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that labeling by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. Responding further, to the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

227. The allegations in this paragraph are denied as to Pfizer. Responding further, to the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

228. This paragraph refers to the FDA-approved labeling for Zantac, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that labeling by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. Responding further, to the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

229. The allegations in this paragraph are denied as to Pfizer. This paragraph refers to the FDA-approved labeling for Zantac, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that labeling by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. Responding further, to the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

## **II. FEDERAL LAW REQUIRED THE DEFENDANTS TO NOTIFY THE FDA ABOUT THE PRESENCE OF NDMA IN RANITIDINE-CONTAINING PRODUCTS**

230. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to uncited scientific evidence, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that scientific evidence by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

231. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.



232. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 314.81(b)(2), which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

233. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 314.81(b)(2)(v), which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

234. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

235. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to uncited publicly available scientific literature, which speaks for itself. To the

extent the allegations contained in this paragraph mischaracterize those studies by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

236. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to uncited studies, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those studies by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

237. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to uncited FDA statements, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those statements by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

### **III. GOOD MANUFACTURING PRACTICES**

238. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 U.S.C. § 351(a)(2)(B), which speaks for

itself. To the extent the allegations contained in this paragraph mischaracterize that provision by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

239. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 210.1(a), which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

240. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 211.142(b), which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

241. This paragraph refers to the cited information published by FDA and Woodcock, as well as a citizen petition from Emery Pharma, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those documents by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

242. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**PLAINTIFFS' USE OF RANITIDINE-CONTAINING PRODUCTS**

243. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

244. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

245. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

246. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

247. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

248. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

249. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a

response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

250. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

251. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

252. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

253. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

254. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

### **TOLLING / FRAUDULENT CONCEALMENT**

255. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

256. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

257. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

258. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

259. The allegations contained in this paragraph state a legal conclusion as to which no response is required. Responding further, Pfizer specifically denies that it affirmatively withheld and/or misrepresented any facts regarding the safety of OTC Zantac. To the extent the remaining allegations in this paragraph require a response, they are denied.

260. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

### **EXEMPLARY / PUNITIVE DAMAGES ALLEGATIONS**

261. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

262. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

263. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

### **CAUSES OF ACTION**

#### **COUNT I: STRICT PRODUCTS LIABILITY—FAILURE TO WARN THROUGH WARNINGS AND PRECAUTIONS**

264. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

265. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

266. Pfizer denies each and every allegation in this paragraph.

267. Pfizer denies each and every allegation in this paragraph.

268. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To

the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

269. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

270. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

271. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

272. This paragraph purports to refer to a publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

273. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication



by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

274. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK statement, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

275. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

276. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK study, which speaks for

itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

277. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

278. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

279. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and,

therefore, denies the same. This paragraph purports to refer to a de Flora study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

280. This paragraph purports to refer to a publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

281. This paragraph purports to refer to a publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

282. This paragraph purports to refer to a publication, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

283. This paragraph purports to refer to a publication by Valisure and a statement by FDA, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize that publication and statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

284. This paragraph purports to refer to a publication by Valisure, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

285. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a publication by Valisure, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

286. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

287. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

288. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

289. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

290. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

291. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

292. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

293. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

294. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

295. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

296. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

297. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a

belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

298. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

299. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

300. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

301. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

302. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

303. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

304. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

305. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

**SUB-COUNT I-1 ALABAMA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

306. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



307. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

308. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

309. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-2 ALASKA: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

310. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

311. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

312. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

313. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-3 ARIZONA: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

314. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

315. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

316. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

317. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-4 ARKANSAS: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

318. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

319. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

320. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

321. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-5 CALIFORNIA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

322. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

323. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

324. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

325. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-6 COLORADO: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

326. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

327. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

328. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

329. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-7 CONNECTICUT: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

330. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

331. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

332. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

333. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-8 DISTRICT OF COLUMBIA: STRICT PRODUCTS  
LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND  
PRECAUTIONS**

334. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

335. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

336. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

337. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-9 FLORIDA: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

338. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

339. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

340. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

341. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-10 GEORGIA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

342. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

343. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

344. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

345. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-11 HAWAII: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

346. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

347. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

348. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

349. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-12 IDAHO: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

350. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

351. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

352. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

353. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-13 ILLINOIS: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

354. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

355. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

356. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

357. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-14 INDIANA: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

358. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

359. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

360. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

361. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-15 KANSAS: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

362. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

363. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

364. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

365. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-16 KENTUCKY: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

366. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

367. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

368. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

369. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-17 LOUISIANA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

370. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



371. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

372. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

373. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-18 MAINE: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

374. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

375. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

376. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

377. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-19 MARYLAND: STRICT PRODUCTS LIABILITY—FAILURE  
TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

378. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

379. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

380. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

381. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-20 MICHIGAN: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

382. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

383. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

384. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

385. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-21 MINNESOTA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

386. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

387. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

388. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

389. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-22 MISSISSIPPI: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

390. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

391. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

392. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

393. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-23 MISSOURI: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

394. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

395. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

396. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

397. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-24 MONTANA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

398. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

399. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

400. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

401. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-25 NEBRASKA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

402. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

403. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

404. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

405. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-26 NEVADA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

406. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

407. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

408. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

409. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-27 NEW HAMPSHIRE: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

410. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

411. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

412. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

413. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-28 NEW JERSEY: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

414. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

415. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

416. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

417. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-29 NEW MEXICO: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

418. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

419. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

420. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

421. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-30 NEW YORK: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

422. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

423. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

424. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

425. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-31 NORTH DAKOTA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

426. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

427. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

428. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

429. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-32 OHIO: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

430. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

431. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

432. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

433. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-33 OKLAHOMA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

434. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



435. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

436. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

437. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-34 OREGON: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

438. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

439. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

440. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

441. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-35 PUERTO RICO: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

442. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

443. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

444. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

445. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-36 RHODE ISLAND: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**  
446. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

447. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

448. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

449. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-37 SOUTH CAROLINA: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**  
450. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

451. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

452. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

453. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-38 SOUTH DAKOTA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**  
454. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

455. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

456. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

457. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-39 TENNESSEE: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**  
458. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

459. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

460. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

461. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-40 TEXAS: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

462. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

463. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

464. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

465. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-41 UTAH: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

466. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

467. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

468. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

469. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-42 VERMONT: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

470. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

471. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

472. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

473. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-43 WASHINGTON: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

474. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

475. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

476. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

477. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-44 WEST VIRGINIA: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**  
478. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

479. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

480. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

481. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-45 WISCONSIN: STRICT PRODUCTS LIABILITY—FAILURE  
TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**  
482. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

483. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

484. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

485. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT I-46 WYOMING: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

486. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

487. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

488. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

489. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**COUNT II: NEGLIGENCE—FAILURE TO WARN THROUGH WARNINGS AND PRECAUTIONS**

490. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

491. Pfizer denies each and every allegation in this paragraph.

492. Pfizer denies each and every allegation in this paragraph.

493. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

494. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

495. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

496. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

497. The allegations in this paragraph as to Pfizer are denied. This paragraph purports to refer to a publication which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.



498. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a publication which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

499. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK statement, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

500. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related

inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

501. The allegations in this paragraph as to Pfizer are denied. The remaining allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

502. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

503. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by

selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

504. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a de Flora study, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

505. This paragraph purports to refer to a publication which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

506. This paragraph purports to refer to a publication which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

507. This paragraph purports to refer to a publication which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

508. This paragraph purports to refer to a publication by Valisure, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

509. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

510. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

511. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

512. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

513. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

514. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

515. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

516. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

517. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a

belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

518. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

519. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

520. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

521. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

522. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

523. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

524. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

525. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

526. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a

belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

527. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

**SUB-COUNT II-1 ALABAMA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

528. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

529. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

530. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

531. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-2 ALASKA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

532. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



533. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

534. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

535. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-3 ARIZONA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

536. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

537. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

538. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

539. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-4 ARKANSAS: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

540. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

541. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

542. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

543. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-5 CALIFORNIA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

544. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

545. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

546. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

547. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-6 COLORADO: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

548. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

549. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

550. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

551. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-7 CONNECTICUT: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

552. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

553. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

554. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

555. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-8 DELAWARE: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

556. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

557. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

558. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

559. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-9 DISTRICT OF COLUMBIA: NEGLIGENCE—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

560. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

561. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

562. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

563. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-10 FLORIDA: NEGLIGENCE—FAILURE TO WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

564. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

565. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

566. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

567. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-11 GEORGIA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

568. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

569. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

570. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

571. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-12 HAWAII: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

572. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

573. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

574. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

575. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-13 IDAHO: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

576. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

577. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

578. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

579. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-14 ILLINOIS: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

580. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

581. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

582. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

583. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-15 INDIANA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

584. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

585. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

586. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

587. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-16 IOWA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

588. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

589. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

590. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

591. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-17 KANSAS: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

592. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

593. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

594. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

595. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-18 KENTUCKY: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

596. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



597. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

598. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

599. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-19 MAINE: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

600. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

601. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

602. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

603. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-20 MARYLAND: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

604. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

605. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

606. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

607. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-21 MASSACHUSETTS: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

608. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

609. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

610. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

611. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-22 MICHIGAN: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

612. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

613. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

614. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

615. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-23 MINNESOTA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

616. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

617. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

618. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

619. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-24 MISSISSIPPI: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

620. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

621. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

622. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

623. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-25 MISSOURI: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

624. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

625. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

626. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

627. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-26 MONTANA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

628. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

629. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

630. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

631. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-27 NEBRASKA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

632. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

633. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

634. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

635. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-28 NEVADA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

636. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

637. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

638. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

639. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-29 NEW HAMPSHIRE: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

640. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

641. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

642. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

643. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-30 NEW MEXICO: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

644. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

645. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

646. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

647. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-31 NEW YORK: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

648. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

649. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

650. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

651. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-32 NORTH CAROLINA: NEGLIGENCE—FAILURE TO  
WARN CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

652. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

653. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

654. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

655. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-33 NORTH DAKOTA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

656. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

657. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

658. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

659. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-34 OKLAHOMA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

660. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



661. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

662. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

663. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-35 OREGON: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

664. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

665. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

666. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

667. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-36 PENNSYLVANIA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

668. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

669. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

670. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

671. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-37 PUERTO RICO: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

672. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

673. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

674. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

675. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-38 RHODE ISLAND: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

676. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

677. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

678. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

679. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-39 SOUTH CAROLINA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

680. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

681. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

682. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

683. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-40 SOUTH DAKOTA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

684. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

685. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

686. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

687. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-41 TENNESSEE: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

688. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

689. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

690. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

691. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-42 TEXAS: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

692. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

693. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

694. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

695. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-43 UTAH: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

696. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

697. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

698. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

699. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-44 VERMONT: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

700. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

701. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

702. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

703. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-45 VIRGINIA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

704. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

705. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

706. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

707. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-46 WEST VIRGINIA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

708. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

709. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

710. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

711. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-47 WISCONSIN: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

712. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

713. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

714. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

715. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT II-48 WYOMING: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH WARNINGS AND PRECAUTIONS**

716. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

717. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

718. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

719. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**COUNT III: STRICT PRODUCTS LIABILITY—FAILURE TO WARN THROUGH  
PROPER EXPIRATION DATES**

720. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

721. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

722. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

723. Pfizer denies each and every allegation in this paragraph.

724. Pfizer denies each and every allegation in this paragraph.

725. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.



726. Pfizer admits only that during the time when Pfizer held the marketing rights to OTC Zantac, the medication had expiration periods ranging from 24 to 36 months. The allegations in this paragraph are otherwise denied.

727. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

728. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 211.137, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

729. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 211.166, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

730. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

731. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

732. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

733. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

734. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

735. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

736. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

737. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

738. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

739. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

740. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a

belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

741. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

742. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent the allegations in this paragraph state a legal conclusion, no response is required. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

743. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

744. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a

belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

745. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

746. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-1 ALABAMA: STRICT PRODUCTS LIABILITY—FAILURE  
TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

747. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

748. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

749. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

750. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-2 ALASKA: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

751. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

752. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

753. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

754. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-3 ARIZONA: STRICT PRODUCTS LIABILITY—FAILURE  
TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

755. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

756. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

757. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

758. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-4 ARKANSAS: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

759. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

760. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

761. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

762. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-5 CALIFORNIA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

763. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

764. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

765. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

766. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-6 COLORADO: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

767. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

768. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

769. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

770. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-7 CONNECTICUT: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

771. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

772. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

773. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

774. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.



**SUB-COUNT III-8 DISTRICT OF COLUMBIA: STRICT PRODUCTS  
LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER  
EXPIRATION DATES**

775. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

776. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

777. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

778. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-9 FLORIDA: STRICT PRODUCTS LIABILITY—FAILURE  
TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

779. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

780. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

781. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

782. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-10 GEORGIA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

783. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

784. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

785. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

786. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-11 HAWAII: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

787. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

788. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

789. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

790. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-12 IDAHO: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

791. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

792. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

793. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

794. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-13 ILLINOIS: STRICT PRODUCTS LIABILITY—FAILURE  
TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

795. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

796. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

797. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

798. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-14 INDIANA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

799. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

800. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

801. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

802. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-15 KANSAS: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

803. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

804. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

805. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

806. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-16 KENTUCKY: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

807. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

808. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

809. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

810. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-17 LOUISIANA: STRICT PRODUCTS LIABILITY—FAILURE  
TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

811. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

812. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

813. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

814. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-18 MAINE: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

815. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

816. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

817. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

818. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-19 MARYLAND: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

819. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

820. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

821. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

822. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-20 MICHIGAN: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

823. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

824. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

825. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

826. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-21 MINNESOTA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

827. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

828. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

829. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

830. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-22 MISSISSIPPI: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

831. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

832. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

833. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

834. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-23 MISSOURI: STRICT PRODUCTS LIABILITY—FAILURE  
TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

835. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

836. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

837. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

838. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.



**SUB-COUNT III-24 MONTANA: STRICT PRODUCTS LIABILITY—FAILURE  
TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

839. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

840. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

841. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

842. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-25 NEBRASKA: STRICT PRODUCTS LIABILITY—FAILURE  
TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

843. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

844. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

845. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

846. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-26 NEVADA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

847. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

848. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

849. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

850. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-27 NEW HAMPSHIRE: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

851. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

852. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

853. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

854. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-28 NEW JERSEY: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

855. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

856. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

857. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

858. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-29 NEW MEXICO: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

859. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

860. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

861. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

862. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-30 NEW YORK: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

863. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

864. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

865. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

866. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-31 NORTH DAKOTA: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

867. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

868. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

869. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

870. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-32 OHIO: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

871. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

872. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

873. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

874. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-33 OKLAHOMA: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

875. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

876. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

877. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

878. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-34 OREGON: STRICT PRODUCTS LIABILITY—FAILURE  
TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

879. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

880. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

881. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

882. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-35 PUERTO RICO: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

883. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

884. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

885. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

886. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-36 RHODE ISLAND: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**  
887. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

888. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

889. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

890. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-37 SOUTH CAROLINA: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**  
891. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

892. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

893. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

894. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-38 SOUTH DAKOTA: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

895. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

896. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

897. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

898. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-39 TENNESSEE: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

899. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

900. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

901. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

902. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.



**SUB-COUNT III-40 TEXAS: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

903. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

904. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

905. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

906. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-41 UTAH: STRICT PRODUCTS LIABILITY—FAILURE TO  
WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

907. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

908. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

909. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

910. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-42 VERMONT: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

911. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

912. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

913. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

914. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-43 WASHINGTON: STRICT PRODUCTS LIABILITY—FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

915. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

916. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

917. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

918. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-44 WEST VIRGINIA: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

919. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

920. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

921. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

922. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-45 WISCONSIN: STRICT PRODUCTS LIABILITY—  
FAILURE TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

923. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

924. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

925. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

926. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT III-46 WYOMING: STRICT PRODUCTS LIABILITY—FAILURE  
TO WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

927. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

928. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

929. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

930. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**COUNT IV: NEGLIGENCE—FAILURE TO WARN THROUGH PROPER  
EXPIRATION DATES**

931. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

932. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

933. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

934. Pfizer denies each and every allegation in this paragraph.

935. Pfizer denies each and every allegation in this paragraph.

936. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To

the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

937. Pfizer admits only that during the time when Pfizer held the marketing rights to OTC Zantac, the medication had expiration periods ranging from 24 to 36 months. The allegations in this paragraph are otherwise denied.

938. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

939. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 211.137, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

940. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 211.166, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

941. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

942. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

943. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

944. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

945. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

946. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To

the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

947. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

948. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

949. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

950. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

951. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

952. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

953. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

954. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent the allegations in this paragraph state a legal conclusion, no response is required. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.



955. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

956. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

957. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

958. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-1 ALABAMA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

959. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

960. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

961. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

962. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-2 ALASKA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

963. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

964. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

965. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

966. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-3 ARIZONA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

967. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

968. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

969. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

970. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-4 ARKANSAS: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

971. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

972. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

973. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

974. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-5 CALIFORNIA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

975. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

976. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

977. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

978. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-6 COLORADO: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

979. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

980. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

981. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

982. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-7 CONNECTICUT: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

983. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

984. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

985. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

986. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-8 DELAWARE: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

987. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

988. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

989. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

990. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-9 DISTRICT OF COLUMBIA: NEGLIGENCE—FAILURE TO  
WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

991. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

992. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

993. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

994. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-10 FLORIDA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

995. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

996. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

997. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

998. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-11 GEORGIA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

999. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1000. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1001. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1002. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-12 HAWAII: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1003. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1004. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1005. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1006. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-13 IDAHO: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1007. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1008. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1009. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1010. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-14 ILLINOIS: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1011. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1012. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1013. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1014. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-15 INDIANA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1015. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



1016. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1017. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1018. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-16 IOWA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1019. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1020. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1021. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1022. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-17 KANSAS: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1023. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1024. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1025. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1026. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-18 KENTUCKY: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1027. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1028. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1029. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1030. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-19 MAINE: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1031. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1032. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1033. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1034. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-20 MARYLAND: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1035. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1036. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1037. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1038. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-21 MASSACHUSETTS: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1039. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1040. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1041. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1042. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-22 MICHIGAN: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1043. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1044. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1045. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1046. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-23 MINNESOTA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1047. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1048. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1049. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1050. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-24 MISSISSIPPI: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1051. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1052. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1053. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1054. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-25 MISSOURI: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1055. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1056. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1057. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1058. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-26 MONTANA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1059. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1060. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1061. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1062. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-27 NEBRASKA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1063. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1064. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1065. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1066. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-28 NEVADA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1067. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1068. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1069. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1070. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-29 NEW HAMPSHIRE: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1071. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1072. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1073. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1074. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-30 NEW MEXICO: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1075. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1076. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1077. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1078. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-31 NEW YORK: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1079. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



1080. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1081. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1082. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-32 NORTH CAROLINA: NEGLIGENCE—FAILURE TO  
WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

1083. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1084. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1085. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1086. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-33 NORTH DAKOTA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1087. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1088. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1089. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1090. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-34 OKLAHOMA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1091. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1092. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1093. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1094. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-35 OREGON: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1095. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1096. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1097. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1098. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-36 PENNSYLVANIA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1099. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1100. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1101. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1102. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-37 PUERTO RICO: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1103. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1104. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1105. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1106. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-38 RHODE ISLAND: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1107. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1108. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1109. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1110. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-39 SOUTH CAROLINA: NEGLIGENCE—FAILURE TO  
WARN CONSUMERS THROUGH PROPER EXPIRATION DATES**

1111. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1112. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1113. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1114. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-40 SOUTH DAKOTA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1115. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1116. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1117. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1118. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-41 TENNESSEE: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1119. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1120. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1121. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1122. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-42 TEXAS: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1123. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1124. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1125. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1126. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-43 UTAH: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1127. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1128. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1129. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1130. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-44 VERMONT: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1131. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1132. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1133. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1134. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-45 VIRGINIA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1135. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1136. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1137. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1138. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-46 WEST VIRGINIA: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1139. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1140. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1141. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1142. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-47 WISCONSIN: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1143. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



1144. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1145. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1146. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT IV-48 WYOMING: NEGLIGENCE—FAILURE TO WARN  
CONSUMERS THROUGH PROPER EXPIRATION DATES**

1147. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1148. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1149. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1150. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**COUNT V: STRICT PRODUCTS LIABILITY—DESIGN DEFECT DUE TO  
WARNINGS AND PRECAUTIONS**

1151. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1152. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1153. Pfizer denies each and every allegation in this paragraph.

1154. Pfizer denies each and every allegation in this paragraph.

1155. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1156. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1157. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1158. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1159. This paragraph purports to refer to a publication which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting,

omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1160. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a publication which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1161. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK statement which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that statement by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1162. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK study which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by

selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1163. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK study which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1164. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK study which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1165. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a GSK study which speaks for

itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1166. The allegations in this paragraph are not directed at Pfizer and therefore require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. This paragraph purports to refer to a de Flora study which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1167. This paragraph purports to refer to a publication which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1168. This paragraph purports to refer to a publication which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1169. This paragraph purports to refer to a publication by Valisure, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that publication by selectively quoting, omitting, and/or emphasizing certain language or by drawing related

inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1170. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1171. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1172. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1173. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1174. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a

belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1175. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1176. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1177. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1178. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1179. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1180. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1181. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1182. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1183. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a



belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1184. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1185. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1186. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1187. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1188. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1189. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied. Responding further, the allegations in this paragraph as to proximate cause state a legal conclusion as to which no response is required.

**SUB-COUNT V-1 ALABAMA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1190. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1191. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1192. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1193. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-2 ALASKA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1194. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1195. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1196. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1197. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-3 ARIZONA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1198. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1199. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1200. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1201. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-4 ARKANSAS: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1202. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1203. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1204. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1205. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-5 CALIFORNIA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1206. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1207. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1208. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1209. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-6 COLORADO: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1210. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1211. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1212. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1213. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-7 CONNECTICUT: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1214. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1215. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1216. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1217. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-8 DISTRICT OF COLUMBIA: STRICT PRODUCTS  
LIABILITY—DESIGN DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1218. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1219. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1220. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1221. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-9 FLORIDA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1222. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1223. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1224. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1225. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-10 GEORGIA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1226. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1227. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1228. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1229. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-11 HAWAII: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1230. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1231. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1232. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1233. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-12 IDAHO: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1234. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1235. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1236. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1237. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-13 ILLINOIS: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1238. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1239. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1240. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1241. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.



**SUB-COUNT V-14 INDIANA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1242. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1243. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1244. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1245. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-15 KANSAS: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1246. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1247. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1248. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1249. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-16 KENTUCKY: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1250. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1251. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1252. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1253. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-17 LOUISIANA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1254. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1255. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1256. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1257. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-18 MAINE: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1258. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1259. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1260. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1261. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-19 MARYLAND: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1262. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1263. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1264. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1265. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-20 MICHIGAN: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1266. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1267. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1268. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1269. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-21 MINNESOTA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1270. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1271. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1272. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1273. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-22 MISSISSIPPI: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1274. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1275. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1276. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1277. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-23 MISSOURI: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1278. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1279. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1280. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1281. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-24 MONTANA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1282. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1283. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1284. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1285. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-25 NEBRASKA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1286. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1287. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1288. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1289. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-26 NEVADA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1290. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1291. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1292. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1293. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-27 NEW HAMPSHIRE: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1294. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1295. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1296. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1297. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-28 NEW JERSEY: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1298. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1299. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1300. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1301. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-29 NEW MEXICO: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1302. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1303. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1304. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1305. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.



**SUB-COUNT V-30 NEW YORK: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1306. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1307. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1308. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1309. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-31 NORTH DAKOTA: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1310. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1311. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1312. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1313. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-32 OHIO: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1314. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1315. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1316. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1317. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-33 OKLAHOMA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1318. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1319. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1320. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1321. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-34 OREGON: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1322. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1323. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1324. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1325. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-35 PUERTO RICO: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1326. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1327. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1328. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1329. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-36 RHODE ISLAND: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1330. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1331. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1332. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1333. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-37 SOUTH CAROLINA: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1334. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1335. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1336. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1337. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-38 SOUTH DAKOTA: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1338. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1339. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1340. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1341. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-39 TENNESSEE: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1342. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1343. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1344. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1345. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-40 TEXAS: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1346. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1347. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1348. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1349. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-41 UTAH: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1350. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1351. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1352. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1353. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-42 VERMONT: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1354. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1355. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1356. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1357. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-43 WASHINGTON: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1358. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1359. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1360. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1361. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-44 WEST VIRGINIA: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1362. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1363. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1364. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1365. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT V-45 WISCONSIN: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1366. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this

Answer are repeated and incorporated as though fully contained herein.

1367. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1368. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1369. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.



**SUB-COUNT V-46 WYOMING: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO WARNINGS AND PRECAUTIONS**

1370. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1371. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1372. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1373. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**COUNT VI: STRICT PRODUCTS LIABILITY – DESIGN DEFECT DUE TO  
IMPROPER EXPIRATION DATES**

1374. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1375. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1376. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1377. Pfizer denies each and every allegation in this paragraph.

1378. Pfizer denies each and every allegation in this paragraph.

1379. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To

the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1380. Pfizer admits only that during the time when Pfizer held the marketing rights to OTC Zantac, the medication had expiration periods ranging from 24 to 36 months. The allegations in this paragraph are otherwise denied.

1381. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1382. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 211.137, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1383. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied. Responding further, this paragraph refers to 21 CFR 211.166, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that provision by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1384. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1385. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1386. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1387. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1388. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1389. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a

belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1390. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1391. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1392. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1393. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1394. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1395. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1396. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1397. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent the allegations in this paragraph state a legal conclusion, no response is required. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1398. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a

belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1399. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1400. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1401. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-1 ALABAMA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1402. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1403. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1404. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1405. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-2 ALASKA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1406. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1407. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1408. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1409. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-3 ARIZONA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1410. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1411. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1412. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1413. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-4 ARKANSAS: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1414. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1415. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1416. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1417. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-5 CALIFORNIA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1418. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1419. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.



1420. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1421. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-6 COLORADO: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1422. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1423. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1424. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1425. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-7 CONNECTICUT: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO IMPROPER EXPIRATION DATES**

1426. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1427. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1428. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1429. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-8 DISTRICT OF COLUMBIA: STRICT PRODUCTS  
LIABILITY—DESIGN DEFECT DUE TO IMPROPER EXPIRATION DATES**

1430. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1431. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1432. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1433. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-9 FLORIDA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1434. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1435. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1436. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1437. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-10 GEORGIA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1438. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1439. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1440. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1441. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-11 HAWAII: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1442. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1443. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1444. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1445. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-12 IDAHO: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1446. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1447. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1448. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1449. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-13 ILLINOIS: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1450. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1451. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1452. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1453. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-14 INDIANA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1454. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1455. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1456. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1457. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-15 KANSAS: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1458. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1459. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1460. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1461. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-16 KENTUCKY: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1462. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1463. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1464. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1465. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-17 LOUISIANA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1466. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1467. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1468. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1469. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-18 MAINE: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1470. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1471. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1472. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1473. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-19 MARYLAND: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1474. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1475. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1476. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1477. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-20 MICHIGAN: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1478. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1479. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1480. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1481. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-21 MINNESOTA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1482. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1483. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.



1484. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1485. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-22 MISSISSIPPI: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1486. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1487. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1488. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1489. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-23 MISSOURI: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1490. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1491. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1492. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1493. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-24 MONTANA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1494. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1495. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1496. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1497. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-25 NEBRASKA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1498. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1499. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1500. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1501. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-26 NEVADA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1502. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1503. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1504. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1505. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-27 NEW HAMPSHIRE: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO IMPROPER EXPIRATION DATES**

1506. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1507. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1508. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1509. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-28 NEW JERSEY: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1510. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1511. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1512. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1513. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-29 NEW MEXICO: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO IMPROPER EXPIRATION DATES**

1514. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1515. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1516. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1517. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-30 NEW YORK: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1518. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1519. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1520. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1521. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-31 NORTH DAKOTA: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO IMPROPER EXPIRATION DATES**

1522. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1523. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1524. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1525. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-32 OHIO: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1526. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1527. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1528. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1529. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-33 OKLAHOMA: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1530. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1531. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1532. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1533. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-34 OREGON: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1534. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1535. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1536. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1537. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-35 PUERTO RICO: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO IMPROPER EXPIRATION DATES**

1538. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1539. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1540. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1541. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-36 RHODE ISLAND: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO IMPROPER EXPIRATION DATES**

1542. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1543. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1544. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1545. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-37 SOUTH CAROLINA: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO IMPROPER EXPIRATION DATES**

1546. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1547. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.



1548. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1549. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-38 SOUTH DAKOTA: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO IMPROPER EXPIRATION DATES**

1550. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1551. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1552. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1553. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-39 TENNESSEE: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1554. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1555. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1556. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1557. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-40 TEXAS: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1558. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1559. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1560. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1561. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-41 UTAH: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1562. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1563. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1564. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1565. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-42 VERMONT: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1566. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1567. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1568. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1569. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-43 WASHINGTON: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO IMPROPER EXPIRATION DATES**

1570. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1571. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1572. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1573. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-44 WEST VIRGINIA: STRICT PRODUCTS LIABILITY—  
DESIGN DEFECT DUE TO IMPROPER EXPIRATION DATES**

1574. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1575. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1576. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1577. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-45 WISCONSIN: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1578. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1579. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1580. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1581. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**SUB-COUNT VI-46 WYOMING: STRICT PRODUCTS LIABILITY—DESIGN  
DEFECT DUE TO IMPROPER EXPIRATION DATES**

1582. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1583. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1584. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1585. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

**COUNT VII: NEGLIGENT FAILURE TO TEST**

1586. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1587. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1588. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1589. This paragraph refers to uncited testing methods and a 2019 study by Valisure, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize the testing methods or Valisure study by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1590. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1591. Pfizer denies each and every allegation in this paragraph.

1592. Pfizer denies each and every allegation in this paragraph.

1593. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1594. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1595. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this

paragraph refers to uncited research by Dr. de Flora and Dr. R.J.N. Tanner, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that research by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1596. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to uncited FDA statements, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those statements by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1597. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1598. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to uncited studies, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those studies by selectively quoting, omitting, and/or

emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1599. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to uncited tests, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those tests by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1600. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1601. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1602. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1603. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a



response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1604. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1605. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1606. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1607. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1608. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VII-1 KANSAS: NEGLIGENT FAILURE TO TEST**

1609. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1610. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1611. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1612. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1613. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to uncited tests, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those tests by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1614. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VII-2 TEXAS: NEGLIGENT FAILURE TO TEST**

1615. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1616. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1617. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1618. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1619. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1620. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**COUNT VIII: NEGLIGENT PRODUCT CONTAINERS**

1621. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1622. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1623. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1624. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. To the extent that the allegations contained in this paragraph state a legal conclusion, no response is required.

1625. Pfizer denies each and every allegation in this paragraph.

1626. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1627. Pfizer denies each and every allegation in this paragraph.

1628. Pfizer denies each and every allegation in this paragraph.

1629. Pfizer denies each and every allegation in this paragraph.

1630. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to uncited FDA statements, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those statements by selectively quoting,

omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1631. Each and every allegation in this paragraph is denied.

1632. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1633. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1634. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-1 ALABAMA: NEGLIGENT PRODUCT CONTAINERS**

1635. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1636. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1637. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1638. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-2 ALASKA: NEGLIGENT PRODUCT CONTAINERS**

1639. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1640. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1641. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1642. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-3 ARIZONA: NEGLIGENT PRODUCT CONTAINERS**

1643. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1644. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1645. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1646. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-4 ARKANSAS: NEGLIGENT PRODUCT CONTAINERS**

1647. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1648. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1649. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1650. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-5 CALIFORNIA: NEGLIGENT PRODUCT CONTAINERS**

1651. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1652. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1653. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1654. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-6 COLORADO: NEGLIGENT PRODUCT CONTAINERS**

1655. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1656. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1657. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1658. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-7 CONNECTICUT: NEGLIGENT PRODUCT CONTAINERS**



1659. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1660. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1661. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1662. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-8 DELAWARE: NEGLIGENT PRODUCT CONTAINERS**

1663. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1664. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1665. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1666. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-9 DISTRICT OF COLUMBIA: NEGLIGENT PRODUCT  
CONTAINERS**

1667. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1668. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1669. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1670. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-10 FLORIDA: NEGLIGENT PRODUCT CONTAINERS**

1671. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1672. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1673. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1674. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-11 GEORGIA: NEGLIGENT PRODUCT CONTAINERS**

1675. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1676. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1677. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1678. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-12 HAWAII: NEGLIGENT PRODUCT CONTAINERS**

1679. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1680. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1681. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1682. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-13 IDAHO: NEGLIGENT PRODUCT CONTAINERS**

1683. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1684. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1685. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1686. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-14 ILLINOIS: NEGLIGENT PRODUCT CONTAINERS**

1687. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1688. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1689. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1690. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-15 INDIANA: NEGLIGENT PRODUCT CONTAINERS**

1691. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1692. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1693. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1694. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-16 IOWA: NEGLIGENT PRODUCT CONTAINERS**

1695. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1696. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1697. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1698. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-17 KANSAS: NEGLIGENT PRODUCT CONTAINERS**

1699. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1700. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1701. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1702. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-18 KENTUCKY: NEGLIGENT PRODUCT CONTAINERS**

1703. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1704. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1705. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1706. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-19 LOUISIANA: NEGLIGENT PRODUCT CONTAINERS**

1707. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1708. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1709. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1710. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-20 MAINE: NEGLIGENT PRODUCT CONTAINERS**

1711. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1712. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1713. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1714. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-21 MARYLAND: NEGLIGENT PRODUCT CONTAINERS**

1715. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



1716. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1717. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1718. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-22 MASSACHUSETTS: NEGLIGENT PRODUCT  
CONTAINERS**

1719. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1720. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1721. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1722. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-23 MICHIGAN: NEGLIGENT PRODUCT CONTAINERS**

1723. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1724. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1725. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1726. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-24 MINNESOTA: NEGLIGENT PRODUCT CONTAINERS**

1727. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1728. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1729. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1730. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-25 MISSISSIPPI: NEGLIGENT PRODUCT CONTAINERS**

1731. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1732. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1733. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1734. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-26 MISSOURI: NEGLIGENT PRODUCT CONTAINERS**

1735. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1736. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1737. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1738. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-27 MONTANA: NEGLIGENT PRODUCT CONTAINERS**

1739. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1740. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1741. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1742. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-28 NEBRASKA: NEGLIGENT PRODUCT CONTAINERS**

1743. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1744. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1745. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1746. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-29 NEVADA: NEGLIGENT PRODUCT CONTAINERS**

1747. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1748. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1749. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1750. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-30 NEW HAMPSHIRE: NEGLIGENT PRODUCT  
CONTAINERS**

1751. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1752. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1753. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1754. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-31 NEW JERSEY: NEGLIGENT PRODUCT CONTAINERS**

1755. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1756. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1757. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1758. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-32 NEW MEXICO: NEGLIGENT PRODUCT CONTAINERS**

1759. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1760. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1761. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1762. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-33 NEW YORK: NEGLIGENT PRODUCT CONTAINERS**

1763. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1764. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1765. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1766. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-34 NORTH CAROLINA: NEGLIGENT PRODUCT  
CONTAINERS**

1767. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1768. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1769. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1770. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-35 NORTH DAKOTA: NEGLIGENT PRODUCT  
CONTAINERS**

1771. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



1772. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1773. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1774. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-36 OHIO: NEGLIGENT PRODUCT CONTAINERS**

1775. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1776. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1777. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1778. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-37 OKLAHOMA: NEGLIGENT PRODUCT CONTAINERS**

1779. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1780. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1781. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1782. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-38 OREGON: NEGLIGENT PRODUCT CONTAINERS**

1783. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1784. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1785. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1786. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-39 PENNSYLVANIA: NEGLIGENT PRODUCT CONTAINERS**

1787. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1788. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1789. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1790. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-40 PUERTO RICO: NEGLIGENT PRODUCT CONTAINERS**

1791. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1792. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1793. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1794. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-41 RHODE ISLAND: NEGLIGENT PRODUCT  
CONTAINERS**

1795. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1796. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1797. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1798. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-42 SOUTH CAROLINA: NEGLIGENT PRODUCT  
CONTAINERS**

1799. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1800. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1801. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1802. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-43 SOUTH DAKOTA: NEGLIGENT PRODUCT  
CONTAINERS**

1803. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1804. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1805. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1806. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-44 TENNESSEE: NEGLIGENT PRODUCT CONTAINERS**

1807. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1808. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1809. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1810. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-45 TEXAS: NEGLIGENT PRODUCT CONTAINERS**

1811. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1812. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1813. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1814. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-46 UTAH: NEGLIGENT PRODUCT CONTAINERS**

1815. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1816. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1817. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1818. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-47 VERMONT: NEGLIGENT PRODUCT CONTAINERS**

1819. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1820. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1821. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1822. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-48 VIRGINIA: NEGLIGENT PRODUCT CONTAINERS**

1823. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1824. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1825. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1826. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT VIII-49 WASHINGTON: NEGLIGENT PRODUCT CONTAINERS**

1827. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



1828. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1829. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1830. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-50 WEST VIRGINIA: NEGLIGENT PRODUCT  
CONTAINERS**

1831. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1832. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1833. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1834. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-51 WISCONSIN: NEGLIGENT PRODUCT CONTAINERS**

1835. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1836. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1837. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1838. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT VIII-52 WYOMING: NEGLIGENT PRODUCT CONTAINERS**

1839. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1840. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1841. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1842. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**COUNT IX: NEGLIGENT STORAGE AND TRANSPORTATION**

1843. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1844. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1845. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1846. Each and every allegation in this paragraph is denied.

1847. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1848. Each and every allegation in this paragraph is denied.

1849. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1850. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1851. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to uncited “testing,” which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize that “testing” by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1852. Each and every allegation in this paragraph is denied.

1853. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, this paragraph refers to the product label, which speaks for itself. To the extent the allegations contained in this paragraph mischaracterize the label by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1854. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or

information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1855. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to uncited “agreements,” which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those agreements by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

1856. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1857. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1858. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the

truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1859. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1860. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1861. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1862. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1863. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1864. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1865. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1866. The allegations in this paragraph are denied as to Pfizer. To the extent the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

1867. The allegations in this paragraph are not directed at Pfizer and, therefore, require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same.

1868. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1869. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-1 ALABAMA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1870. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1871. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1872. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1873. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-2 ALASKA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1874. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



1875. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1876. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1877. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-3 ARIZONA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1878. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1879. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1880. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1881. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-4 ARKANSAS: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1882. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1883. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1884. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1885. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-5 CALIFORNIA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1886. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1887. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1888. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1889. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-6 COLORADO: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1890. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1891. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1892. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1893. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-7 CONNECTICUT: NEGLIGENT STORAGE AND  
TRANSPORTATION  
(Against All Defendants)**

1894. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1895. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1896. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1897. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-8 DELAWARE: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1898. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1899. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1900. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1901. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-9 DISTRICT OF COLUMBIA: NEGLIGENT STORAGE  
AND TRANSPORTATION**

1902. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1903. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1904. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1905. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-10 FLORIDA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1906. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1907. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1908. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1909. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-11 GEORGIA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1910. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1911. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1912. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1913. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-12 HAWAII: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1914. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1915. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1916. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1917. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-13 IDAHO: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1918. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1919. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1920. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1921. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-14 ILLINOIS: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1922. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1923. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1924. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1925. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-15 INDIANA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1926. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1927. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1928. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1929. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-16 IOWA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1930. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



1931. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1932. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1933. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-17 KANSAS: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1934. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1935. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1936. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1937. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-18 KENTUCKY: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1938. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1939. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1940. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1941. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-19 LOUISIANA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1942. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1943. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1944. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1945. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-20 MAINE: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1946. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1947. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1948. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1949. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-21 MARYLAND: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1950. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1951. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1952. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1953. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-22 MASSACHUSETTS: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1954. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1955. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1956. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1957. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-23 MICHIGAN: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1958. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1959. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1960. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1961. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-24 MINNESOTA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1962. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1963. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1964. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1965. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-25 MISSISSIPPI: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1966. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1967. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1968. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1969. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-26 MISSOURI: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1970. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1971. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1972. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1973. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-27 MONTANA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1974. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1975. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1976. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1977. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-28 NEBRASKA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1978. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1979. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1980. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1981. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-29 NEVADA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1982. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1983. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1984. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1985. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-30 NEW HAMPSHIRE: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1986. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



1987. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1988. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1989. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-31 NEW JERSEY: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1990. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1991. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1992. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1993. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-32 NEW MEXICO: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1994. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1995. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1996. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

1997. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-33 NEW YORK: NEGLIGENT STORAGE AND  
TRANSPORTATION**

1998. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

1999. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2000. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2001. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-34 NORTH CAROLINA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2002. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2003. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2004. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2005. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-35 NORTH DAKOTA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2006. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2007. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2008. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2009. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-36 OHIO: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2010. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2011. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2012. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2013. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-37 OKLAHOMA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2014. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2015. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2016. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2017. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-38 OREGON: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2018. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2019. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2020. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2021. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-39 PENNSYLVANIA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2022. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2023. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2024. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2025. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-40 PUERTO RICO: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2026. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2027. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2028. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2029. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-41 RHODE ISLAND: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2030. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2031. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2032. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2033. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-42 SOUTH CAROLINA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2034. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2035. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2036. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2037. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-43 SOUTH DAKOTA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2038. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2039. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2040. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2041. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-44 TENNESSEE: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2042. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



2043. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2044. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2045. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-45 TEXAS: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2046. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2047. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2048. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2049. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-46 UTAH: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2050. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2051. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2052. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2053. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-47 VERMONT: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2054. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2055. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2056. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2057. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-48 VIRGINIA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2058. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2059. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2060. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2061. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-49 WASHINGTON: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2062. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2063. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2064. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2065. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-50 WEST VIRGINIA: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2066. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2067. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2068. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2069. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-51 WISCONSIN: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2070. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2071. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2072. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2073. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT IX-52 WYOMING: NEGLIGENT STORAGE AND  
TRANSPORTATION**

2074. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2075. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2076. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2077. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

## **COUNT X: UNJUST ENRICHMENT**

2078. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2079. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2080. The allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2081. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2082. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, Pfizer admits only that it held the North American marketing rights to OTC Zantac from 2000 to 2006. The allegations as to Pfizer in this paragraph are otherwise denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2083. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, Pfizer admits only that it held the North American marketing rights to OTC Zantac from 2000 to 2006. The allegations as to Pfizer in this paragraph are otherwise denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2084. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2085. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2086. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations as to Pfizer in this paragraph are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. Responding further, this paragraph refers to uncited FDA statements, which speak for themselves. To the extent the allegations contained in this paragraph mischaracterize those statements by selectively quoting, omitting, and/or emphasizing certain language or by drawing related inferences or stating related opinions, they are denied. The allegations in this paragraph are otherwise denied.

#### **SUB-COUNT X-1 ALABAMA: UNJUST ENRICHMENT**

2087. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2088. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.



2089. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2090. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-2 ALASKA: UNJUST ENRICHMENT**

2091. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2092. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2093. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2094. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-3 ARIZONA: UNJUST ENRICHMENT**

2095. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2096. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2097. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2098. The allegations contained in this paragraph are denied.

**SUB-COUNT X-4 ARKANSAS: UNJUST ENRICHMENT**

2099. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2100. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2101. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2102. The allegations contained in this paragraph are denied.

**SUB-COUNT X-5 CALIFORNIA: UNJUST ENRICHMENT**

2103. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2104. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2105. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2106. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-6 COLORADO: UNJUST ENRICHMENT**

2107. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2108. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2109. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2110. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-7 CONNECTICUT: UNJUST ENRICHMENT**

2111. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2112. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2113. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2114. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-8 DELAWARE: UNJUST ENRICHMENT**

2115. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2116. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2117. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2118. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-9 DISTRICT OF COLUMBIA: UNJUST ENRICHMENT**

2119. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2120. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2121. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2122. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-10 FLORIDA: UNJUST ENRICHMENT**

2123. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2124. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2125. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2126. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-11 GEORGIA: UNJUST ENRICHMENT**

2127. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2128. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2129. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2130. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-12 HAWAII: UNJUST ENRICHMENT**

2131. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2132. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2133. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2134. The allegations contained in this paragraph are denied.

**SUB-COUNT X-13 IDAHO: UNJUST ENRICHMENT**

2135. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2136. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2137. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2138. The allegations contained in this paragraph are denied.

**SUB-COUNT X-14 ILLINOIS: UNJUST ENRICHMENT**

2139. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2140. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2141. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2142. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-15 INDIANA: UNJUST ENRICHMENT**

2143. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2144. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2145. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2146. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-16 IOWA: UNJUST ENRICHMENT**

2147. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2148. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2149. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2150. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-17 KANSAS: UNJUST ENRICHMENT**

2151. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2152. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2153. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2154. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-18 KENTUCKY: UNJUST ENRICHMENT**

2155. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2156. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2157. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2158. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-19 LOUISIANA: UNJUST ENRICHMENT**

2159. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2160. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.



2161. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2162. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-20 MAINE: UNJUST ENRICHMENT**

2163. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2164. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2165. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2166. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-21 MARYLAND: UNJUST ENRICHMENT**

2167. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2168. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2169. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2170. The allegations contained in this paragraph are denied.

**SUB-COUNT X-22 MASSACHUSETTS: UNJUST ENRICHMENT**

2171. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2172. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2173. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2174. The allegations contained in this paragraph are denied.

**SUB-COUNT X-23 MICHIGAN: UNJUST ENRICHMENT**

2175. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2176. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2177. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2178. The allegations contained in this paragraph are denied.

**SUB-COUNT X-24 MINNESOTA: UNJUST ENRICHMENT**

2179. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2180. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2181. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2182. The allegations contained in this paragraph are denied.

**SUB-COUNT X-25 MISSISSIPPI: UNJUST ENRICHMENT**

2183. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2184. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2185. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2186. The allegations contained in this paragraph are denied.

**SUB-COUNT X-26 MISSOURI: UNJUST ENRICHMENT**

2187. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2188. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2189. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2190. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-27 MONTANA: UNJUST ENRICHMENT**

2191. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2192. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2193. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2194. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-28 NEBRASKA: UNJUST ENRICHMENT**

2195. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2196. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2197. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2198. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-29 NEVADA: UNJUST ENRICHMENT**

2199. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2200. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2201. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2202. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-30 NEW HAMPSHIRE: UNJUST ENRICHMENT**

2203. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2204. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2205. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2206. The allegations contained in this paragraph are denied.

**SUB-COUNT X-31 NEW JERSEY: UNJUST ENRICHMENT**

2207. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2208. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2209. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2210. The allegations contained in this paragraph are denied.

**SUB-COUNT X-32 NEW MEXICO: UNJUST ENRICHMENT**

2211. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2212. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2213. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2214. The allegations contained in this paragraph are denied.

### **SUB-COUNT X-33 NEW YORK: UNJUST ENRICHMENT**

2215. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2216. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2217. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2218. The allegations contained in this paragraph are denied.

### **SUB-COUNT X-34 NORTH CAROLINA: UNJUST ENRICHMENT**

2219. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2220. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2221. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2222. The allegations contained in this paragraph are denied.

### **SUB-COUNT X-35 NORTH DAKOTA: UNJUST ENRICHMENT**

2223. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2224. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2225. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2226. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-36 OHIO: UNJUST ENRICHMENT**

2227. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2228. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2229. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2230. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-37 OKLAHOMA: UNJUST ENRICHMENT**

2231. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2232. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.



2233. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2234. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-38 OREGON: UNJUST ENRICHMENT**

2235. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2236. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2237. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2238. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-39 PENNSYLVANIA: UNJUST ENRICHMENT**

2239. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2240. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2241. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2242. The allegations contained in this paragraph are denied.

**SUB-COUNT X-40 PUERTO RICO: UNJUST ENRICHMENT**

2243. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2244. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2245. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2246. The allegations contained in this paragraph are denied.

**SUB-COUNT X-41 RHODE ISLAND: UNJUST ENRICHMENT**

2247. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2248. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2249. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2250. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-42 SOUTH CAROLINA: UNJUST ENRICHMENT**

2251. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2252. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2253. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2254. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-43 SOUTH DAKOTA: UNJUST ENRICHMENT**

2255. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2256. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2257. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2258. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-44 TENNESSEE: UNJUST ENRICHMENT**

2259. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2260. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2261. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2262. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-45 TEXAS: UNJUST ENRICHMENT**

2263. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2264. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2265. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2266. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-46 UTAH: UNJUST ENRICHMENT**

2267. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2268. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2269. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2270. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-47 VERMONT: UNJUST ENRICHMENT**

2271. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2272. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2273. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2274. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-48 VIRGINIA: UNJUST ENRICHMENT**

2275. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2276. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2277. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2278. The allegations contained in this paragraph are denied.

**SUB-COUNT X-49 WASHINGTON: UNJUST ENRICHMENT**

2279. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2280. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2281. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2282. The allegations contained in this paragraph are denied.

**SUB-COUNT X-50 WEST VIRGINIA: UNJUST ENRICHMENT**

2283. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2284. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2285. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2286. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-51 WISCONSIN: UNJUST ENRICHMENT**

2287. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2288. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2289. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2290. The allegations contained in this paragraph are denied.

#### **SUB-COUNT X-52 WYOMING: UNJUST ENRICHMENT**

2291. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2292. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2293. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2294. The allegations contained in this paragraph are denied.

#### **COUNT XI: LOSS OF CONSORTIUM**

2295. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the

allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2296. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2297. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2298. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2299. Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2300. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the



truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

#### **SUB-COUNT XI-1 ALABAMA: LOSS OF CONSORTIUM**

2301. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2302. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-2 ALASKA: LOSS OF CONSORTIUM**

2303. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2304. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-3 ARIZONA: LOSS OF CONSORTIUM**

2305. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2306. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-4 ARKANSAS: LOSS OF CONSORTIUM**

2307. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2308. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-5 CALIFORNIA: LOSS OF CONSORTIUM**

2309. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2310. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-6 COLORADO: LOSS OF CONSORTIUM**

2311. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2312. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-7 CONNECTICUT: LOSS OF CONSORTIUM**

2313. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2314. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-8 DELAWARE: LOSS OF CONSORTIUM**

2315. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2316. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-9 DISTRICT OF COLUMBIA: LOSS OF CONSORTIUM**

2317. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2318. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-10 FLORIDA: LOSS OF CONSORTIUM**

2319. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2320. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-11 GEORGIA: LOSS OF CONSORTIUM**

2321. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2322. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-12 HAWAII: LOSS OF CONSORTIUM**

2323. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2324. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-13 IDAHO: LOSS OF CONSORTIUM**

2325. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2326. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-14 ILLINOIS: LOSS OF CONSORTIUM**

2327. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2328. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-15 INDIANA: LOSS OF CONSORTIUM**

2329. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2330. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-16 IOWA: LOSS OF CONSORTIUM**

2331. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2332. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-17 KANSAS: LOSS OF CONSORTIUM**

2333. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2334. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-18 KENTUCKY: LOSS OF CONSORTIUM**

2335. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2336. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-19 LOUISIANA: LOSS OF CONSORTIUM**

2337. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2338. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-20 MAINE: LOSS OF CONSORTIUM**

2339. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2340. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-21 MARYLAND: LOSS OF CONSORTIUM**

2341. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2342. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-22 MASSACHUSETTS: LOSS OF CONSORTIUM**

2343. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2344. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-23 MICHIGAN: LOSS OF CONSORTIUM**

2345. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2346. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-24 MINNESOTA: LOSS OF CONSORTIUM**

2347. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2348. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-25 MISSISSIPPI: LOSS OF CONSORTIUM**

2349. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2350. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-26 MISSOURI: LOSS OF CONSORTIUM**

2351. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2352. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-27 MONTANA: LOSS OF CONSORTIUM**

2353. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2354. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-28 NEBRASKA: LOSS OF CONSORTIUM**

2355. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2356. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-29 NEVADA: LOSS OF CONSORTIUM**

2357. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



2358. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-30 NEW HAMPSHIRE: LOSS OF CONSORTIUM**

2359. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2360. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-31 NEW JERSEY: LOSS OF CONSORTIUM**

2361. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2362. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-32 NEW MEXICO: LOSS OF CONSORTIUM**

2363. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2364. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-33 NEW YORK: LOSS OF CONSORTIUM**

2365. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2366. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-34 NORTH CAROLINA: LOSS OF CONSORTIUM**

2367. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2368. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-35 NORTH DAKOTA: LOSS OF CONSORTIUM**

2369. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2370. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-36 OHIO: LOSS OF CONSORTIUM**

2371. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2372. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-37 OKLAHOMA: LOSS OF CONSORTIUM**

2373. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2374. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-38 OREGON: LOSS OF CONSORTIUM**

2375. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2376. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-39 PENNSYLVANIA: LOSS OF CONSORTIUM**

2377. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2378. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-40 PUERTO RICO: LOSS OF CONSORTIUM**

2379. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2380. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-41 RHODE ISLAND: LOSS OF CONSORTIUM**

2381. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2382. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-42 SOUTH CAROLINA: LOSS OF CONSORTIUM**

2383. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2384. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-43 SOUTH DAKOTA: LOSS OF CONSORTIUM**

2385. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2386. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-44 TENNESSEE: LOSS OF CONSORTIUM**

2387. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2388. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-45 TEXAS: LOSS OF CONSORTIUM**

2389. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2390. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-46 UTAH: LOSS OF CONSORTIUM**

2391. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2392. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-47 VERMONT: LOSS OF CONSORTIUM**

2393. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2394. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-48 VIRGINIA: LOSS OF CONSORTIUM**

2395. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2396. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-49 WASHINGTON: LOSS OF CONSORTIUM**

2397. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2398. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XI-50 WEST VIRGINIA: LOSS OF CONSORTIUM**

2399. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2400. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-51 WISCONSIN: LOSS OF CONSORTIUM**

2401. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2402. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XI-52 WYOMING: LOSS OF CONSORTIUM**

2403. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2404. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **COUNT XII: SURVIVAL ACTIONS**

2405. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2406. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2407. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2408. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2409. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the



allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2410. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2411. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

#### **SUB-COUNT XII-1 ALABAMA: SURVIVAL ACTION**

2412. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2413. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-2 ALASKA: SURVIVAL ACTIONS**

2414. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2415. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-3 ARIZONA: SURVIVAL ACTIONS**

2416. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2417. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-4 ARKANSAS: SURVIVAL ACTIONS**

2418. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2419. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-5 CALIFORNIA: SURVIVAL ACTIONS**

2420. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2421. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-6 COLORADO: SURVIVAL ACTIONS**

2422. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2423. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-7 CONNECTICUT: SURVIVAL ACTIONS**

2424. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2425. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-8 DELAWARE: SURVIVAL ACTIONS**

2426. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2427. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-9 DISTRICT OF COLUMBIA: SURVIVAL ACTIONS**

2428. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2429. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-10 FLORIDA: SURVIVAL ACTIONS**

2430. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2431. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-11 GEORGIA: SURVIVAL ACTIONS**

2432. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2433. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-12 HAWAII: SURVIVAL ACTIONS**

2434. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2435. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-13 IDAHO: SURVIVAL ACTIONS**

2436. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2437. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-14 ILLINOIS: SURVIVAL ACTIONS**

2438. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2439. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-15 INDIANA: SURVIVAL ACTIONS**

2440. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2441. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-16 IOWA: SURVIVAL ACTIONS**

2442. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2443. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-17 KANSAS: SURVIVAL ACTIONS**

2444. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2445. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-18 KENTUCKY: SURVIVAL ACTIONS**

2446. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2447. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-19 LOUISIANA: SURVIVAL ACTIONS**

2448. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2449. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-20 MAINE: SURVIVAL ACTIONS**

2450. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2451. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-21 MARYLAND: SURVIVAL ACTIONS**

2452. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2453. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-22 MASSACHUSETTS: SURVIVAL ACTIONS**

2454. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2455. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XII-23 MICHIGAN: SURVIVAL ACTIONS**

2456. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2457. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XII-24 MINNESOTA: SURVIVAL ACTIONS**

2458. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2459. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XII-25 MISSISSIPPI: SURVIVAL ACTIONS**

2460. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2461. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.



#### **SUB-COUNT XII-26 MISSOURI: SURVIVAL ACTIONS**

2462. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2463. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-27 MONTANA: SURVIVAL ACTIONS**

2464. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2465. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-28 NEBRASKA: SURVIVAL ACTIONS**

2466. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2467. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-29 NEVADA: SURVIVAL ACTIONS**

2468. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2469. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XII-30 NEW HAMPSHIRE: SURVIVAL ACTIONS**

2470. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2471. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XII-31 NEW JERSEY: SURVIVAL ACTIONS**

2472. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2473. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XII-32 NEW MEXICO: SURVIVAL ACTIONS**

2474. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2475. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-33 NEW YORK: SURVIVAL ACTIONS**

2476. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2477. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-34 NORTH CAROLINA: SURVIVAL ACTIONS**

2478. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2479. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-35 NORTH DAKOTA: SURVIVAL ACTIONS**

2480. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2481. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-36 OHIO: SURVIVAL ACTIONS**

2482. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2483. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XII-37 OKLAHOMA: SURVIVAL ACTIONS**

2484. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2485. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XII-38 OREGON: SURVIVAL ACTIONS**

2486. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2487. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XII-39 PENNSYLVANIA: SURVIVAL ACTIONS**

2488. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2489. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XII-40 PUERTO RICO: SURVIVAL ACTIONS**

2490. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2491. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XII-41 RHODE ISLAND: SURVIVAL ACTIONS**

2492. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2493. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XII-42 SOUTH CAROLINA: SURVIVAL ACTIONS**

2494. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2495. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XII-43 SOUTH DAKOTA: SURVIVAL ACTIONS**

2496. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2497. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-44 TENNESSEE: SURVIVAL ACTIONS**

2498. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2499. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-45 TEXAS: SURVIVAL ACTIONS**

2500. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2501. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-46 UTAH: SURVIVAL ACTIONS**

2502. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2503. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-47 VERMONT: SURVIVAL ACTIONS**

2504. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2505. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-48 VIRGINIA: SURVIVAL ACTIONS**

2506. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2507. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-49 WASHINGTON: SURVIVAL ACTIONS**

2508. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2509. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-50 WEST VIRGINIA: SURVIVAL ACTIONS**

2510. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2511. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-51 WISCONSIN: SURVIVAL ACTIONS**

2512. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2513. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XII-52 WYOMING: SURVIVAL ACTIONS**

2514. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2515. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **COUNT XIII: WRONGFUL DEATH**

2516. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

2517. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a



response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2518. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

2519. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, the allegations in this paragraph as to Pfizer are denied. To the extent that the allegations in this paragraph are not directed at Pfizer, they require no response from Pfizer. To the extent a response is required, Pfizer lacks knowledge or information sufficient to form a belief as to the truth of the allegations of this paragraph and, therefore, denies the same. The allegations in this paragraph are otherwise denied.

#### **SUB-COUNT XIII-1 ALABAMA: WRONGFUL DEATH**

2520. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2521. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-2 ALASKA: WRONGFUL DEATH**

2522. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2523. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-3 ARIZONA: WRONGFUL DEATH**

2524. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2525. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-4 ARKANSAS: WRONGFUL DEATH**

2526. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2527. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-5 CALIFORNIA: WRONGFUL DEATH**

2528. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2529. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-6 COLORADO: WRONGFUL DEATH**

2530. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2531. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-7 CONNECTICUT: WRONGFUL DEATH**

2532. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2533. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-8 DELAWARE: WRONGFUL DEATH**

2534. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2535. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-9 DISTRICT OF COLUMBIA: WRONGFUL DEATH**

2536. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2537. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-10 FLORIDA: WRONGFUL DEATH**

2538. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2539. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-11 GEORGIA: WRONGFUL DEATH**

2540. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2541. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-12 HAWAII: WRONGFUL DEATH**

2542. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2543. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-13 IDAHO: WRONGFUL DEATH**

2544. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2545. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-14 ILLINOIS: WRONGFUL DEATH**

2546. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2547. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-15 INDIANA: WRONGFUL DEATH**

2548. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2549. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

### **SUB-COUNT XIII-16 IOWA: WRONGFUL DEATH**

2550. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2551. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

### **SUB-COUNT XIII-17 KANSAS: WRONGFUL DEATH**

2552. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2553. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

### **SUB-COUNT XIII-18 KENTUCKY: WRONGFUL DEATH**

2554. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2555. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

### **SUB-COUNT XIII-19 LOUISIANA: WRONGFUL DEATH**

2556. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2557. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-20 MAINE: WRONGFUL DEATH**

2558. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2559. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-21 MARYLAND: WRONGFUL DEATH**

2560. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2561. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-22 MASSACHUSETTS: WRONGFUL DEATH**

2562. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2563. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-23 MICHIGAN: WRONGFUL DEATH**

2564. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2565. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-24 MINNESOTA: WRONGFUL DEATH**

2566. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2567. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-25 MISSISSIPPI: WRONGFUL DEATH**

2568. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2569. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-26 MISSOURI: WRONGFUL DEATH**

2570. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.



2571. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-27 MONTANA: WRONGFUL DEATH**

2572. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2573. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-28 NEBRASKA: WRONGFUL DEATH**

2574. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2575. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-29 NEVADA: WRONGFUL DEATH**

2576. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2577. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

### **SUB-COUNT XIII-30 NEW HAMPSHIRE: WRONGFUL DEATH**

2578. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2579. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

### **SUB-COUNT XIII-31 NEW JERSEY: WRONGFUL DEATH**

2580. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2581. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

### **SUB-COUNT XIII-32 NEW MEXICO: WRONGFUL DEATH**

2582. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2583. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

### **SUB-COUNT XIII-33 NEW YORK: WRONGFUL DEATH**

2584. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2585. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-34 NORTH CAROLINA: WRONGFUL DEATH**

2586. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2587. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-35 NORTH DAKOTA: WRONGFUL DEATH**

2588. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2589. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-36 OHIO: WRONGFUL DEATH**

2590. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2591. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-37 OKLAHOMA: WRONGFUL DEATH**

2592. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2593. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-38 OREGON: WRONGFUL DEATH**

2594. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2595. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-39 PENNSYLVANIA: WRONGFUL DEATH**

2596. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2597. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-40 PUERTO RICO: WRONGFUL DEATH**

2598. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2599. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-41 RHODE ISLAND: WRONGFUL DEATH**

2600. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2601. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-42 SOUTH CAROLINA: WRONGFUL DEATH**

2602. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2603. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-43 SOUTH DAKOTA: WRONGFUL DEATH**

2604. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2605. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-44 TENNESSEE: WRONGFUL DEATH**

2606. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2607. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-45 TEXAS: WRONGFUL DEATH**

2608. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2609. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-46 UTAH: WRONGFUL DEATH**

2610. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2611. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

#### **SUB-COUNT XIII-47 VERMONT: WRONGFUL DEATH**

2612. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2613. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-48 VIRGINIA: WRONGFUL DEATH**

2614. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2615. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-49 WASHINGTON: WRONGFUL DEATH**

2616. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2617. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

**SUB-COUNT XIII-50 WEST VIRGINIA: WRONGFUL DEATH**

2618. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2619. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

### **SUB-COUNT XIII-51 WISCONSIN: WRONGFUL DEATH**

2620. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2621. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

### **SUB-COUNT XIII-52 WYOMING: WRONGFUL DEATH**

2622. Pfizer's responses to each of the allegations contained in the preceding paragraphs of this Answer are repeated and incorporated as though fully contained herein.

2623. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

### **JURY TRIAL DEMAND**

2624. The allegations contained in this paragraph state a legal conclusion as to which no response is required. To the extent the allegations in this paragraph require a response, they are denied.

### **PFIZER INC.'S AFFIRMATIVE DEFENSES**

By asserting the matters set forth below, Pfizer does not allege or admit that it has the burden of proof and/or the burden of persuasion with respect to any of these matters. Pfizer reserves its rights to seek to amend and supplement these Affirmative Defenses as may be appropriate or necessary. Pfizer asserts as follows:



### **FIRST AFFIRMATIVE DEFENSE**

The SAMPIC, in whole or in part, fails to state a claim or cause of action upon which relief can be granted.

### **SECOND AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred because Plaintiffs cannot proffer any scientifically reliable evidence that the product at issue was defective or unreasonably dangerous.

### **THIRD AFFIRMATIVE DEFENSE**

Without admitting that the product at issue was manufactured and/or sold by Pfizer, to the extent Pfizer had any duty with respect to the sale and/or manufacture of the product, such duty was fully discharged by the giving of adequate instructions and warnings concerning its use.

### **FOURTH AFFIRMATIVE DEFENSE**

Plaintiffs' alleged injuries and/or medical expenses resulted from pre-existing or unrelated medical, psychiatric, genetic, or environmental conditions, diseases, or illnesses.

### **FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, by the doctrine of federal preemption.

### **SIXTH AFFIRMATIVE DEFENSE**

If Plaintiffs suffered injuries and damages by reason of operation of nature or idiosyncratic and/or allergic reaction to the product, used whether alone or in combination with any drug, Pfizer is not liable.

### **SEVENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred or reduced under the principles of assumption of the risk and/or informed consent.

#### **EIGHTH AFFIRMATIVE DEFENSE**

Plaintiffs' recovery, if any, from Pfizer should be reduced, offset, or barred by the contributory or comparative negligence, fault, responsibility, or causation attributable to Plaintiffs or to some third party other than Pfizer.

#### **NINTH AFFIRMATIVE DEFENSE**

Plaintiffs' injuries and damages, if any, were caused in whole or in part by an alteration, change, unintended use, or misuse of the product at issue.

#### **TENTH AFFIRMATIVE DEFENSE**

Plaintiffs' alleged injuries were caused or contributed to be caused by the intervening acts, superseding negligence, and/or subsequent conduct or fault on the part of a person or entity over whom Pfizer neither had control nor right of control and, therefore, Plaintiffs' claims are barred and/or Pfizer is entitled to an apportionment of damages accordingly.

#### **ELEVENTH AFFIRMATIVE DEFENSE**

Plaintiffs' alleged damages were not proximately caused by any act or omission of Pfizer and/or were caused or proximately caused by some person or third party other than Pfizer for whom Pfizer is not legally responsible.

#### **TWELFTH AFFIRMATIVE DEFENSE**

One or more of the claims set forth in the SAMPIC are barred in whole or in part by the applicable statutes of limitation and/or statutes of repose.

#### **THIRTEENTH AFFIRMATIVE DEFENSE**

Pfizer specifically pleads collateral estoppel, res judicata, waiver, laches, and failure to mitigate or minimize damages, if any.

#### **FOURTEENTH AFFIRMATIVE DEFENSE**

Any acts performed by Pfizer in the design, manufacture, and marketing of the product at issue were in conformity with the “state of the art” existing at the time of such design, manufacture, and marketing, and public policy should hold that liability not be imposed on Pfizer for untold risks not known at the time of design, manufacture, and marketing of the product at issue.

#### **FIFTEENTH AFFIRMATIVE DEFENSE**

Plaintiffs’ claims are subject to the limitations set forth in the Restatement (Second) of Torts, section 402A, comment k, and/or the Restatement (Third) of Torts.

#### **SIXTEENTH AFFIRMATIVE DEFENSE**

Pfizer had no duty to warn of the possible dangers of using the product at issue, the existence of which are denied, that were not known at the time of manufacture or sale of the product.

#### **SEVENTEENTH AFFIRMATIVE DEFENSE**

All of Pfizer’s activities and conduct conformed to all state and federal statutes, regulations, and industry standards based upon the state of knowledge existing at the relevant time.

#### **EIGHTEENTH AFFIRMATIVE DEFENSE**

The methods, standards, and techniques utilized by Pfizer in designing, formulating, manufacturing, and marketing the product at issue and in issuing warnings and instructions with respect to its use were proper and in conformity with the generally recognized, reasonably available, and reliable state of knowledge in the field at the time the product was manufactured.

#### **NINETEENTH AFFIRMATIVE DEFENSE**

The injuries and/or damages claimed by Plaintiffs were the result of unavoidable circumstances that Pfizer could not have prevented.

#### **TWENTIETH AFFIRMATIVE DEFENSE**

The injuries and/or damages claimed by Plaintiffs were the result of a pre-existing condition unrelated to any conduct of, or products placed in the stream of commerce by, Pfizer.

#### **TWENTY-FIRST AFFIRMATIVE DEFENSE**

The conduct of Pfizer in all activities with respect to the product at issue has been and is under the supervision of FDA. Accordingly, this action is barred by the doctrine of primary jurisdiction.

#### **TWENTY-SECOND AFFIRMATIVE DEFENSE**

The alleged negligent or culpable conduct of Pfizer, none being admitted, was so insubstantial as to be insufficient to be a proximate or substantial contributing cause of Plaintiffs' alleged injuries.

#### **TWENTY-THIRD AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred in whole or in part by the sophisticated user defense.

#### **TWENTY-FOURTH AFFIRMATIVE DEFENSE**

The injuries and/or damages claimed by Plaintiffs can be attributed to several causes and, accordingly, should be apportioned among the various causes according to the respective contribution of each such cause to the harm sustained.

#### **TWENTY-FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred because the use of the product at issue was generally recognized as safe and effective pursuant to conditions established by FDA and applicable regulations, including packaging and labeling regulations.

#### **TWENTY-SIXTH AFFIRMATIVE DEFENSE**

The public interest, benefit, and availability of the product at issue outweigh the risks, if any, resulting from such activities, which were unavoidable given the state of knowledge at the time those activities were undertaken.

#### **TWENTY-SEVENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred in whole or in part by the principles of the learned intermediary and/or experienced user doctrine.

#### **TWENTY-EIGHTH AFFIRMATIVE DEFENSE**

Any verdict or judgment rendered against Pfizer must be reduced by those amounts that have or will, with reasonable certainty, replace or indemnify Plaintiffs, in whole or in part, for any past or future claimed economic loss, from any collateral source such as insurance, Social Security, worker's compensation, or employee benefit programs.

#### **TWENTY-NINTH AFFIRMATIVE DEFENSE**

No act or omission of Pfizer was malicious, willful, wanton, reckless, grossly negligent, or intentional, and therefore any award of punitive damages is barred.

#### **THIRTIETH AFFIRMATIVE DEFENSE**

At the time the product left Pfizer's control, there was not a practical and technically feasible alternative design that would have prevented the harm without substantially impairing the reasonably anticipated or intended function of the product.

**THIRTY-FIRST AFFIRMATIVE DEFENSE**

Pfizer is not liable for any harm caused because the product at issue contained an adequate warning as evidenced by its approval by FDA under the Federal Food, Drug, and Cosmetic Act.

**THIRTY-SECOND AFFIRMATIVE DEFENSE**

Punitive damages are not available to Plaintiffs because the drug at issue was subject to premarket approval or licensure by FDA under the Federal Food, Drug, and Cosmetic Act and was approved or licensed.

**THIRTY-THIRD AFFIRMATIVE DEFENSE**

Pfizer relies upon all defenses contained in any applicable state statute or law.

**THIRTY-FOURTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, because there was no deceptive act or practice.

**THIRTY-FIFTH AFFIRMATIVE DEFENSE**

None of Pfizer's acts, conduct, omissions, or statements alleged in the SAMPIC was likely to mislead.

**THIRTY-SIXTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs and/or their prescribing physicians knew, at all times, the characteristics, uses, benefits, standard, and quality of the product at issue and therefore could not have justifiably relied on the alleged misrepresentations or omissions in the SAMPIC.

### **THIRTY-SEVENTH AFFIRMATIVE DEFENSE**

The representations and advertising regarding the product at issue are not unlawful because they are not, and were not, in violation of any law or regulation.

### **THIRTY-EIGHTH AFFIRMATIVE DEFENSE**

The representations and advertising regarding the product at issue were not and are not fraudulent. No representation or advertisement contains any false or misleading statement or promises intended to deceive the public. As such, the representations and advertising are not, and were not, fraudulent.

### **THIRTY-NINTH AFFIRMATIVE DEFENSE**

Plaintiffs are not entitled to relief under the statutes and legal theories invoked in their SAMPIC because Plaintiffs lack standing.

### **FORTIETH AFFIRMATIVE DEFENSE**

Pfizer has fully performed any and all contractual, statutory, and other duties, and Plaintiffs are therefore estopped from asserting any cause of action against Pfizer.

### **FORTY-FIRST AFFIRMATIVE DEFENSE**

Any award to Plaintiffs in this action would constitute unjust enrichment.

### **FORTY-SECOND AFFIRMATIVE DEFENSE**

The SAMPIC and each cause of action therein presented are vague, ambiguous, and uncertain. Pfizer reserves the right to add additional defenses as the factual bases for each of Plaintiffs' claims and allegations become known.

### **FORTY-THIRD AFFIRMATIVE DEFENSE**

To the extent Plaintiffs purport to seek equitable relief to mandate the specific content of Pfizer's product labels, Plaintiffs' SAMPIC violates Pfizer's right to freedom of speech under the

First Amendment of the United States Constitution and the similar provisions in any applicable state constitutions.

#### **FORTY-FOURTH AFFIRMATIVE DEFENSE**

Pfizer is not liable for injuries or damages caused by any product that Pfizer did not sell or distribute pursuant to the NDAs that it held for Zantac.

#### **FORTY-FIFTH AFFIRMATIVE DEFENSE**

Pfizer denies this court has personal jurisdiction over it and hereby alleges lack of personal jurisdiction as a separate affirmative defense.

#### **FORTY-SIXTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims for punitive damages are in violation of Pfizer's rights under the Due Process Clause of the Fifth and Fourteenth Amendments of the United States Constitution and similar provisions in any applicable state constitutions and/or applicable state common law and public policies, and/or applicable statutes and court rules, in the circumstances of the litigation. *See, e.g., State Farm Mut. Auto. Ins. Co. v. Campbell*, 538 U.S. 408 (2003).

#### **FORTY-SEVENTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims for punitive damages are in violation of Pfizer's rights under the Excessive Fines Clause of the Eighth Amendment of the United States Constitution; the Double Jeopardy Clause of the Fifth Amendment of the United States Constitution; the Free Speech Clause of the First Amendment of the United States Constitution; the Commerce Clause of Article I, Section 8 of the United States Constitution; the Contracts Clause of Article I, Section 10 of the United States Constitution; similar provisions in any applicable state constitutions and/or applicable state common law and public policies; and/or applicable statutes and court rules, in the circumstances of this litigation.



#### **FORTY-EIGHTH AFFIRMATIVE DEFENSE**

Because of the lack of clear standards, the imposition of punitive damages against Pfizer is unconstitutionally vague and/or overbroad.

#### **FORTY-NINTH AFFIRMATIVE DEFENSE**

The Zantac labeling was not false or misleading in any particular, and the product accordingly was not misbranded.

#### **DEFENSES RESERVED**

Pfizer hereby gives notice that it intends to rely upon any other defense that may become available or appear during the discovery proceedings in the case and hereby reserves the right to amend this Answer to assert any such defense. Pfizer also reserves the right to assert other and related defenses as may become available upon a determination of the law applicable to the action or any part thereof or claim therein.

#### **PRAYER FOR RELIEF**

WHEREFORE, Pfizer prays for judgment as follows:

1. That Plaintiffs take nothing;
2. That the Court enter judgment in favor of Pfizer on each remaining cause of action alleged in the SAMPIC;
3. That Pfizer be awarded its costs, expenses, and reasonable attorney's fees; and
4. That the Court grant Pfizer all further legal and equitable relief that it deems just and proper.

#### **JURY TRIAL DEMANDED**

Pfizer demands a trial by jury on all claims triable by jury.

**DEMAND FOR BIFURCATED TRIAL**

If Plaintiffs are permitted to proceed to trial upon any claims for punitive or exemplary damages, such claims, if any, must be bifurcated from the remaining issues.

Dated: August 23, 2021

Respectfully submitted,

/s/ Joseph G. Petrosinelli

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 23, 2021 a copy of the foregoing ANSWER AND AFFIRMATIVE DEFENSES OF PFIZER INC. was filed with the Clerk of Court using the CM/ECF system, which will provide automatic notification to all counsel of record.

/s/ Joseph G. Petrosinelli  
Joseph G. Petrosinelli