UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

ELAINE ROBINSON, et al.,)
Plaintiffs,)
)) Case No.: 4:16-cv-00439-CEJ
VS.	
PFIZER INC.,	
Defendant.)

PLAINTIFFS' MOTION TO REMAND AND REQUEST FOR EXPEDITED CONSIDERATION

Pursuant to 28 U.S.C. § 1447(c) and for the reasons set forth in Plaintiffs' Memorandum in Support of Motion to Remand, which Plaintiffs incorporate herein by reference, Plaintiffs move for an Order remanding this action to the Circuit Court for the Twenty-Second Judicial Circuit, City of St. Louis, State of Missouri for lack of subject matter jurisdiction. Plaintiffs seek such further and other relief as may be just and proper. Dated: April 8, 2016

Respectfully submitted,

/s/ Eric S. Johnson Eric S. Johnson (MO 61680) Andy S. Williams (MO 41947) SIMMONS HANLY CONROY One Court Street Alton, IL 62002 Telephone: 618.259.2222 Facsimile: 618.259.2251 ejohnson@simmonsfirm.com awilliams@simmonsfirm.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was

served via the Court's CM/ECF filing system, this 8th day of April, 2016, to all counsel of record.

/s/ Eric S. Johnson Eric S. Johnson