



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

LOUISIANA MUNICIPAL POLICE)
EMPLOYEES' RETIREMENT SYSTEM, and)
U.F.C.W. LOCAL 1776 & PARTICIPATING)
EMPLOYERS PENSION FUND,)

Plaintiffs,)

v.)

C.A. No. 5795-VCL

DAVID PYOTT, HERBERT W. BOYER,)
LOUIS J. LAVINGNE, GAVIN S.)
HERBERT, STEPHEN J. RYAN,)
LEONARD D. SCHAEFFER, MICHAEL R.)
GALLAGHER, ROBERT ALEXANDER)
INGRAM, TREVOR M. JONES, DAWN E.)
HUDSON, RUSSELL T. RAY, and)
DEBORAH DUNSIRE,)

Defendants,)

and)

ALLERGAN, INC.,)
Nominal Defendant.)

**NOMINAL DEFENDANT ALLERGAN, INC.'S MOTION TO DISMISS
THE VERIFIED SECOND AMENDED DERIVATIVE COMPLAINT**

By and through its undersigned counsel, Nominal Defendant Allergan, Inc. ("Allergan") hereby moves to dismiss Plaintiffs Louisiana Municipal Police Employees' Retirement System and U.F.C.W. Local 1776 & Participating Employers Pension Fund's Verified Second Amended Derivative Complaint on the grounds that it fails to meet the pleading requirements of Court of Chancery Rule 23.1.

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Dated: July 15, 2011

**CERTIFICATE OF SERVICE TO
NOMINAL DEFENDANT ALLERGAN, INC.'S MOTION TO DISMISS
THE VERIFIED SECOND AMENDED DERIVATIVE COMPLAINT**

I hereby certify that copies of **Nominal Defendant Allergan, Inc.'s Motion To Dismiss**

The Verified Second Amended Derivative Complaint were served on counsel below via

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