

DOCKET NOS.:X03-HHD-CV17-6140353-S:
and X03-HHD-CV20-6141143-S

SUPERIOR COURT

PFIZER, INC.

COMPLEX LITIGATION
DOCKET

v.

JUDICIAL DISTRICT OF
HARTFORD

THE TOWN OF GROTON


October 10, 2023

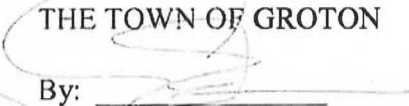
MOTION FOR JUDGMENT BY STIPULATION

The parties in the above-entitled action hereby request that the Court enter judgment in accordance with the attached Judgment by Stipulation.

THE PLAINTIFF,
PFIZER, INC.

THE DEFENDANT,
THE TOWN OF GROTON

By: 
Charles D. Ray
Shawn S. Smith
McCarter & English, LLP
CityPlace I
185 Asylum Street
Hartford, Connecticut 06103
Tel.: (860) 275-6700
Fax: (860) 724-3397
Juris No. 419091

By: 
Eric W. Callahan, Esq.
Richard S. Cody, Esq.
Suisman Shapiro Wool Brennan
Gray & Greenberg, PC
The Courtney Building
Suite 200
2 Union Plaza
P.O. Box 1591
New London, CT 06320
Juris No. 062114

Frank E. Ferruggia (admitted Pro Hac Vice)
Michael D. Benak (admitted Pro Hac Vice)
McCarter & English, LLP
Four Gateway Center
100 Mulberry St.
Newark, NJ 07102
Tel.: (973) 639-7998
Fax: (973) 297-3747

Its Attorneys

Its Attorneys

DOCKET NOS.:X03-HHD-CV17-6140353-S: and X03-HHD-CV20-6141143-S	:	SUPERIOR COURT
	:	
PFIZER, INC.	:	COMPLEX LITIGATION
	:	DOCKET
	:	
v.	:	JUDICIAL DISTRICT OF
	:	HARTFORD
	:	
THE TOWN OF GROTON	:	October 10, 2023

JUDGMENT BY STIPULATION

1. The plaintiff, Pfizer, Inc., and the defendant, the Town of Groton, hereto stipulate and agree that judgment may be entered to find that the market value of the land and improvements that are the subject of the above-captioned real property tax appeal, known as 000 Eastern Point Road, particularly described in the records of Groton as Parcel ID Number 168815526760 (“North Campus Subject Parcel”), shall be as follows, effective with the October 1, 2016 Grand List:

(a) (“North Campus Subject Parcel”):		
Grand List	Market Value	Assessment
October 1, 2016	\$277,300,000	\$194,110,000
October 1, 2017	\$277,300,000	\$194,110,000
October 1, 2018	\$268,040,000	\$187,628,000
October 1, 2019	\$268,040,000	\$187,628,000
October 1, 2020	\$268,040,000	\$187,628,000

2. The plaintiff, Pfizer, Inc., and the defendant, the Town of Groton, hereto stipulate and agree that judgment may be entered to find that the market value of the land and improvements that are the subject of the above-captioned real property tax appeal, known as 445 Eastern Point Road, particularly described in the records of Groton as Parcel ID Number

168818427055 (“West Campus Subject Parcel”), shall be as follows, effective with the October 1, 2016 Grand List:

(a) (“West Campus Subject Parcel”):

Grand List	Market Value	Assessment
October 1, 2016	\$44,700,000	\$31,290,000
October 1, 2017	\$44,700,000	\$31,290,000
October 1, 2018	\$44,700,000	\$31,290,000
October 1, 2019	\$44,700,000	\$31,290,000
October 1, 2020	\$44,700,000	\$31,290,000

3. The assessments were agreed to by the parties based upon the facts and circumstances in the above-captioned cases solely for the purpose of the settlement of these appeals and shall not have any precedential effect in any other context, including but not limited to any other litigation pending now or in the future between the parties.


4. The Defendant shall reimburse excess taxes levied against the said North Campus Subject Parcel (in the amount of \$4,671,680) and said West Campus Subject Parcel (in the amount of \$912,279) (totaling \$5,583,959) for the 2016-17-18-19-20 Grand lists in five (5) consecutive equal yearly installments of \$1,116,791 by a credit against future real estate taxes levied against that said parcels by the Defendant. Said credit shall commence with the July 1, 2024 tax bill and continue annually to and including the July 1, 2028 tax bill.

5. Furthermore, the parties agree that for the grand list years 2018, 2019 and 2020, a separate tax account was established with parcel identification number 168815526760 B230. The parties agree that this settlement herein will result in no change to the \$6,482,000 assessment of parcel identification number 168815526760 B230 for grand list years 2018, 2019 and 2020.

6. Costs and interest shall not be taxed against either party in this matter.

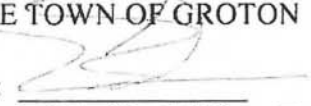
7. Except as otherwise stated herein, the Judgment set forth in this Stipulation shall be binding on the parties' heirs, successors, and assigns.

THE PLAINTIFF,
PFIZER, INC.

By: 
Charles D. Ray
Shawn S. Smith
McCarter & English, LLP
CityPlace I
185 Asylum Street
Hartford, Connecticut 06103
Tel.: (860) 275-6700
Fax: (860) 724-3397
Juris No. 419091

Frank E. Ferruggia (admitted Pro Hac Vice)
Michael D. Benak (admitted Pro Hac Vice)
McCarter & English, LLP
Four Gateway Center
100 Mulberry St.
Newark, NJ 07102
Tel.: (973) 639-7998
Fax: (973) 297-3747
Its Attorneys

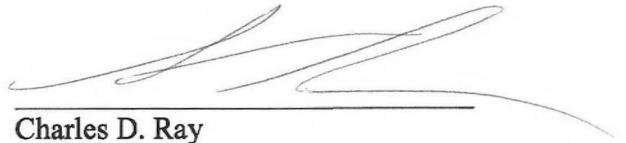
THE DEFENDANT,
THE TOWN OF GROTON

By: 
Eric W. Callahan, Esq.
Richard S. Cody, Esq.
Suisman Shapiro Wool Brennan
Gray & Greenberg, PC
The Courtney Building
Suite 200
2 Union Plaza
P.O. Box 1591
New London, CT 06320
Juris No. 062114

Its Attorneys

CERTIFICATION OF SERVICE

I hereby certify that a copy of the foregoing was mailed or delivered electronically on October 10, 2023 to all counsel and self-represented parties of record listed below and that written consent for electronic delivery was received from all counsel who were electronically served.



Charles D. Ray
Shawn Smith
McCarter & English, LLP
CityPlace I – 185 Asylum Street
Hartford, Connecticut 06103