



## Second Circuit Holds ERISA Fiduciary Duties Do Not Apply to Employer Under a Non-ERISA Stock and Incentive Plan

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A recent case from the Second Circuit provides useful guidance regarding the scope of ERISA fiduciary duties. In *Bell v. Pfizer, Inc.*, 2010 U. S. App. LEXIS 18111 (2d Cir. Aug. 30, 2010), the court resolved a dispute between a former employee and the Pfizer, Inc. Stock and Incentive Plan ("Pfizer Plan") concerning the employee's eligibility to exercise certain stock options after leaving employment with Pfizer.

### Related People

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