

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 07-21221-CIV-ALTONAGA/TURNOFF

RENEE BLASZKOWSKI, AMY
HOLLUB, PATRICIA DAVIS, *et. al.*,
individually and on behalf of others
similarly situated,
Plaintiffs,

vs.

MARS, INCORPORATED, *et al.*,
Defendants.

DEFENDANT SAFEWAY INC.'S NOTICE OF FILING
SUPPLEMENTAL DECLARATION

Defendant Safeway Inc. hereby gives notice of filing the Supplemental Declaration of Laura A. Donald in support of Defendants' Consolidated Motion to Dismiss Plaintiffs' Corrected Amended Complaint and Incorporated Memorandum of Law (D.E. 232).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2007, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to the counsel so indicated on the attached Service List.

/s/Marcos Daniel Jiménez

Marcos Daniel Jiménez

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Case No. 07-21221-CIV-ALTONAGA/TURNOFF

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Laura A. Donald, pursuant to 28 U.S.C. §1746, declares as follows:

1. I am an Assistant Vice President and Assistant Secretary of Safeway Inc. ("Safeway"). I am over the age of 18 and make this declaration based upon my personal knowledge from information obtained in the course of my duties as Assistant Vice President and Assistant Secretary of Safeway.

2. On September 20, 2007, I submitted a declaration in support of Safeway's motion to dismiss the Corrected Amended Class Action Complaint for lack of personal jurisdiction over Safeway in the State of Florida (the "Declaration").

3. In paragraph 11 of the Declaration, I stated, based on my personal knowledge from information obtained in the course of my duties, that Safeway did not have any employees in the State of Florida. I have since learned that Safeway has three Quality Control Field Specialists ("Field Specialists") and one Financial Planning Analyst Manager, Information Technology ("FPA (IT)") in the State of Florida.

4. The Field Specialists inspect flowers and produce which are imported into the

United States from other countries through third party vendors before continuing on to their ultimate destination outside the State of Florida through third party vendors. The flowers and produce inspected by the Field Specialists are not sold by Safeway in the State of Florida. They are shipped from Florida to locations where Safeway has stores and makes sales to the public. Thus, Safeway has no sales or distribution activity in the State of Florida from the flowers and produce examined by the Field Specialists.

5. The FPA (IT) performs information technology work for Safeway operations in other states but maintains a residence in Florida.

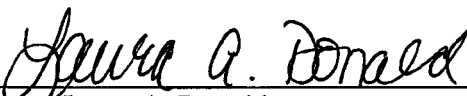
6. The three Field Specialists and one FPA (IT) are not involved in any way with the manufacture, distribution, marketing, advertising, or sale of pet food, or with any other commercial pet food activity whatsoever.

7. Safeway has approximately 171,000 employees in the United States. The four employees described above therefore represent less than .002% of Safeway's total employees.

8. The remainder of the facts recited in the Declaration are true and correct to the best of my knowledge.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 12, 2007


Laura A. Donald