

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION**

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

RENEE BLASZKOWSKI, AMY HOLLUM, PATRICIA DAVIS, SUSAN PETERS, DEBORAH HOCK, MIKE FLOYD, BETH WILSON, CLAIRE KOTZAMPALTIRIS, DONNA HOPKINS-JONES, NICOLE PIAZZA, MARIAN LUPO, JANE HERRING, JO-ANN MURPHY, STEPHANIE STONE, PATRICIA HANRAHAN, DEBBIE RICE, ANN QUINN, SHARON MATHIESEN, SANDY SHORE, CAROLYN WHITE, LOU WIGGINS, MICHELLE LUCARELLI, RAUL ISERN, DANIELE VALORAS, individually and on behalf of others similarly situated,

Plaintiffs/Class Representatives,

vs.

MARS, INC., MARS PETCARE US, INC., PROCTOR AND GAMBLE, CO., THE IAMS CO., COLGATE PALMOLIVE COMPANY, HILL'S PET NUTRITION, a Delaware Corporation, DEL MONTE FOODS, CO., NESTLE USA INC., NESTLE PURINA PETCARE CO., NESTLE S.A., NUTRO PRODUCTS INC., MENU FOODS, INC., MENU FOODS INCOME FUND, DOANE PET CARE ENTERPRISES, INC., PUBLIX SUPERMARKETS, INC., NEW ALBERTSON'S INC., ALBERTSON'S LLC, THE KROGER CO. OF OHIO, SAFEWAY INC., H. E. BUTT GROCERY COMPANY, MEIJER INC., MEIJER SUPER MARKETS, INC., THE STOP & SHOP SUPERMARKET COMPANY, PETCO ANIMAL SUPPLIES STORES, INC., PET SUPERMARKET, INC., PET SUPPLIES "PLUS," PET SUPPLIES PLUS/USA INC., PETSMART INC., TARGET CORP., WAL-MART STORES, INC.,

Defendants.

**SECOND AFFIDAVIT OF ROBERT VERHEULEN IN SUPPORT OF
JURISDICTIONAL DEFENDANTS' MEMORANDUM IN OPPOSITION TO
PLAINTIFF'S MOTION FOR LEAVE TO CONDUCT PERSONAL
JURISDICTION DISCOVERY**

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

STATE OF MICHIGAN

COUNTY OF KENT

Before me, the undersigned authority, personally appeared Robert VerHeulen, who upon being duly sworn, deposes and states:

1. My name is Robert VerHeulen. I am over the age of eighteen (18) years old, am competent to testify and have personal knowledge of the facts contained in this Affidavit;
2. I am Vice President and Deputy General Counsel of Meijer, Inc.;
3. On September 18, 2007, Meijer, Inc.'s affiliate, MeijerEcom, Inc., offered for the first time online retail service through an Internet website at Meijer.com to the general public located in every state comprising the United States.
4. Since September 18, 2007, Meijer, Inc.'s online sales to Florida consumers through Meijer.com comprise 2 % of the dollar volume of Meijer, Inc.'s total Internet sales.
5. During the relevant class period, Meijer, Inc. did not advertise, market, sell or offer for sale any pet food or pet treats on its Meijer.com website.
6. Meijer, Inc. has never advertised, marketed, sold or offered for sale any pet food on its Meijer.com website.
7. On or about November 23, 2007, Meijer, Inc. began offering pet treats for sale on its Meijer.com website. As of 12/6/07, not a single pet treat offered for sale on Meijer.com has been sold to any Florida consumer.

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8. As of 12/6/07, only one pet treat offered for sale on Meijer.com has been sold to a consumer and that was a sale in the amount of \$59.97 made to an Indiana consumer on 11/28/2007.

FURTHER AFFIANT SAYETH NAUGHT



ROBERT VERHEULEN

ACKNOWLEDGMENT

I HEREBY CERTIFY that on this 7th day of December, 2007, personally appeared Robert VerHeulen, who is personally known to me or who produced the following identification Michigan driver's license and he swore, subscribed and acknowledged before me that he executed the foregoing as his free act and deed as such officer or representative of said corporation or entity, for the uses and purposes therein mentioned, and that he did take an oath.

In witness whereof, I have hereunto set my hand and seal in Kent,
County, Michigan.

SEAL



Signature

PAT A. BIGOROWSKI
Notary Public, Kent County, Michigan
Acting in Kent County
My Commission Expires July 1, 2012