

**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, 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., PETSMAST INC., TARGET CORP., WAL-MART STORES, INC.,

Defendants.

**DEFENDANT MEIJER, INC.'S RESPONSE IN OPPOSITION TO PLAINTIFFS'/
CLASS REPRESENTATIVES' MOTION FOR LEAVE TO
CONDUCT PERSONAL JURISDICTION DISCOVERY**

Defendant, Meijer, Inc. ("Meijer") gives notice of filing the attached Third Affidavit of Robert VerHeulen in Support of Jurisdictional Defendants' Memorandum In Opposition To Plaintiffs' Motion For Leave To Conduct Personal Jurisdiction Discovery, a copy of which is attached hereto as Exhibit A.

Dated: December 10, 2007

Respectfully submitted,

SQUIRE SANDERS & DEMPSEY, LLP
200 South Biscayne Boulevard
Suite 4000
Miami, FL 33131
Phone: 305-577-7000
Facsimile: 305-577-7001
Email: JJoffe@ssd.com

By: /s/ Jason Joffe
Jason Joffe
Florida Bar No. 0013564

Attorneys for Defendant Meijer, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of December, 2007, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record identified on the attached Service List.

/s/ Jason Joffe
Jason Joffe

CERTIFICATE OF SERVICE

RENEE BLASZKOWSKI, ETC., ET AL., VS. MARS, INC., et al.
Case No. 07-21221-CIV-ALTONAGA/TURNOFF

SERVICE LIST

Catherine J. MacIvor
cmacivor@mflegal.com
Jeffrey Eric Foreman
jforeman@mflegal.com
Jeffrey Bradford Maltzman
jmaltzman@mflegal.com
Darren W. Friedman
dfriedman@mflegal.com
MALTZMAN FOREMAN PA
2 S Biscayne Boulevard
Suite 2300 One Biscayne Tower
Miami, FL 33131-1803
Telephone: 305-358-6555
Facsimile: 305-374-9077

Attorneys for Plaintiffs

John B.T. Murray, Jr.
jbmurray@ssd.com
SQUIRE, SANDERS & DEMPSEY L.L.P.
1900 Phillips Point West Palm Beach
777 South Flagler Drive
West Palm Beach, Florida 33480
John B.T. Murray, Jr., Esquire
Telephone: 561-.650-7200
Facsimile: 561-655-1509

*Attorneys for Defendant PETCO Animal Supplies, Inc.
and Wal-Mart Stores, Inc.*

Robin Lea Hanger
rlhanger@ssd.com
SQUIRE, SANDERS & DEMPSEY L.L.P.
200 S. Biscayne Boulevard, Suite 4000
Miami, Florida 33131
Telephone: 305-577-7040
Facsimile: 305-577-7001

Attorneys for Defendant PETCO Animal Supplies, Inc.

Gary L. Justice
gjustice@gibsondunn.com
Charles Abbott
cabbott@gibsondunn.com
Gail E. Lees
grees@gibsondunn.com
William Edward Wegner
wwegner@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
333 S. Grand Avenue, Suite 4600
Los Angeles, CA 90071
Telephone: 213-229-7000
Facsimile: 213-229-6163

Adriana Riviere-Badell
ariviere-badell@hunton.com
Marty Steinberg
msteinberg@hunton.com
HUNTON & WILLIAMS, LLP
Mellon Financial Center
1111 Brickell Avenue
Suite 2500
Miami, Florida 33131
Telephone: 305-810-2500
Facsimile: 305-810-2460

Attorneys for Nutro Products, Inc.

Kathleen S. Phang
kphang@sfklaw.com
Charles Philip Flick
cflick@sfklaw.com
SEIPP, FLICK & KISSANE
Two Alhambra Plaza, Suite 800
Miami, FL 33134-5241
Telephone: 305-995-5600
Facsimile: 305-995-6100

Attorneys for Target Corp.

Alan Graham Greer
agreer@richmangreer.com
**RICHMAN GREER WEIL BRUMBAUGH MIRABITO &
CHRISTENSEN**
Miami Center, Tenth Floor
201 South Biscayne Boulevard
Miami, FL 33131
Telephone: 305-373-4010
Facsimile: 305-373-4099

D. Jeffery Ireland
djireland@ficlaw.com
Laura A. Sanom
lsanom@ficlaw.com
Brian D. Wright
bwright@ficlaw.com
FAUKI IRELAND & COX P.L.L.
500 Courthouse Plaza, S.W.
10 North Ludlow Street
Dayton, OH 45402
Telephone: 937-227-3710
Facsimile: 937-227-3717

Attorneys for Proctor & Gamble Co.

Hugh J. Turner, Jr.
hugh.turner@akerman.com
AKERMAN SENTERFITT & EIDSON
350 E Las Olas Boulevard
Suite 1600
Fort Lauderdale, FL 33301-0006
Telephone: 954-463-2700
Facsimile: 954-463-2224

Attorneys for Publix Supermarkets, Inc.

Omar Ortega
oortega@dortaandortega.com
DORTA AND ORTEGA P.A.
800 S. Douglas Road, Suite 149
Coral Gables, FL 33134
Telephone: 305-461-5454
Facsimile: 305-461-5226

Philip A. Sechler
psechler@wc.com
Patrick J. Houlihan
phoulihan@wc.com
Dane H. Butswinkas
dbutswinkas@wc.com
Christopher M. DAngelo
cdangelo@wc.com
Thomas G. Hentoff
thentoff@wc.com
Dane H. Butsinkas
dbutswinkas@wc.com
WILLIAMS & CONNOLLY LLP
725 12th Street, N.W.
Washington, D.C. 20005
Telephone: 202-434-5000
Facsimile: 202-434-5029

Attorneys for Mars, Inc.

Sherril M. Colombo
scolombo@cozen.com
COZEN O'CONNOR
Wachovia Financial Center
200 South Biscayne Boulevard, Suite 4410
Miami, FL 33131-2303
Telephone: 305-704-5945
Facsimile: 305-704-5955

Richard Fama
rfama@cozen.com
John J. McDonough
jmcdonough@cozen.com
COZEN O'CONNOR
16th Floor, 45 Broadway
New York, New York 10006
Telephone: 212-509-9400
Facsimile: 212-509-9492

John F. Mullen
jmullen@cozen.com
1900 Market Street
Philadelphia, PA 19103
Telephone: 215-665-2179
Facsimile: 215-665-2013

Attorneys for Del Monte Foods, Co.

Alexander Shaknes
alex.shaknes@dlapiper.com
Amy W. Schulman
amy.schulman@dlapiper.com
DLA PIPER LLP
1251 Avenue of the Americas
New York, New York 10020
Telephone: 212-335-4500
Facsimile: 212-335-4501

Lonnie L. Simpson
lonnie.simpson@dlapiper.com
S. Douglas Knox
douglas.knox@dlapiper.com
101 East Kennedy Boulevard, Suite 2000
Tampa, Florida 33602
Telephone: 813-229-2111
Facsimile: 813-229-1447

William C. Martin
william.martin@dlapiper.com
203 North LaSalle Street, Suite 1900
Chicago, Illinois 60601
Telephone: 312-368-4000
Facsimile: 312-236-7516

*Attorneys for Menu Foods, Inc. and Menu Foods
Income Fund*

Steve Busey
busey@smithhulsey.com
SMITH HULSEY & BUSEY
225 Water Street, Suite 1800
Jacksonville, FL 32202
Telephone: 904-359-7700
Facsimile: 904-353-9908

Attorneys for Winn Dixie Stores, Inc.

John J. Kuster
jkuster@sidley.com
James D. Arden
jarden@sidley.com
Kara L. McCall
kmccall@sidley.com
SIDLEY AUSTIN LLP
787 Seventh Avenue
New York, NY 10019
Telephone: 212-839-5300
Facsimile: 212-839-5599

Benjamine Reid
breid@carltonfields.com
Olga M. Vieira
ovieira@carltonfields.com
CARLTON FIELDS, P.A.
100 S.E. Second Street, Suite 4000
Bank of America Tower at International Place
Miami, Florida 33131-9101
Telephone: 305-530-0050
Facsimile: 305-530-0055

Attorneys for Colgate-Palmolive Company

Carol A. Licko
calicko@hhl.com
HOGAN & HARTSON LLP
Mellon Financial Center
1111 Brickell Avenue, Suite 1900
Miami, FL 33131
Telephone: 305-459-6500
Facsimile: 305-459-6550

Robert Troyer
rtroyer@hhlaw.com
HOGAN & HARTSON LLP
One Tabor Center, Suite 1500
1200 Seventeenth Street
Denver, CO 80202
Telephone: 303-899-7300
Facsimile: 303-899-7333

Craig A. Hoover
cahoover@hhlaw.com
Miranda L. Berge
mlberge@hhlaw.com
HOGAN & HARTSON LLP
555 Thirteenth Street, NW
Washington, D.C. 20004
Telephone: 202-637-5600
Facsimile: 202-637-5910

Attorneys for Nestle U.S.A., Inc.

Rolando Andres Diaz
RD@kubickidraper.com
Cassidy Yen Dang
cyd@kubickidraper.com
Maria Kayanan
mek@kubickidraper.com
KUBICKI DRAPER
25 W. Flagler Street, Penthouse
Miami, FL 33130-1712
Telephone: 305-982-6708
Facsimile: 305-374-7846

Attorneys for Pet Supermarket, Inc.

Ralph G. Patino
rpatino@patinolaw.com
Dominick V. Tamarazzo
dtamarazzo@patinolaw.com
Carlos B. Salup
csalup@patinolaw.com
PATINO & ASSOCIATES, P.A.
225 Alcazar Avenue
Coral Gables, Florida 33134
Telephone: 305-443-6163
Facsimile: 305-443-5635

Attorneys for Pet Supplies "Plus" and Pet Supplies Plus/USA, Inc. Attorneys for H.E. Butt Grocery Co.

James K. Reuss
jreuss@lanealton.com
LANE ALTON & HORST, LLC
Two Miranova Place
Suite 500
Columbus, Ohio 43215
Telephone: 614-233-4719
Facsimile: 614-228-0146

C. Richard Fulmer, Jr.
FULMER LEROY ALBEE BAUMANN & GLASS, PLC
2866 East Oakland Park Boulevard
Fort Lauderdale, Florida 33306
Telephone: 954-707-4430
Facsimile: 954-707-4431

Attorneys for The Kroger Co.
Robert Valadez
rvaladez@shelton-valadez.com
Javier Thomas Duran
jduran@shelton-valadez.com
SHELTON & VALADEZ, P.C.
600 Navarro, Suite 500
San Antonio, Texas 78205
Telephone: 210-349-0515
Facsimile: 210-349-3666

W. Randolph Teslik
rteslik@akingump.com
Andrew Dober
adober@akingump.com
AKIN GUMP STAUSS HAUER & FELD
1333 New Hampshire Avenue, NW
Washington, D.C. 20036
Telephone: 202-887-4000
Facsimile: 202-887-4288

Marcus D. Jimenez
mdj@kennynachwalter.com
KENNY NACHWALTER, P.A.
1100 Miami Center
201 South Biscayne Boulevard
Miami, Florida 33131
Telephone: 305-373-1000
Facsimile: 305-372-1861

Daniel S. Day
dan.day@supervalu.com
SUPERVALU—LEGAL DEPARTMENT
250 Parkcenter Boulevard
Boise, Idaho 83726
Telephone: 208-395-5194

*Attorneys for Safeway, Inc. and The Stop & Shop
Supermarket Company*

*Attorneys for New Albertson' s Inc., and
Albertson' s LLC*