

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

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

RENEE BLASZKOWSKI, et al.,
individually and on behalf of others
similarly situated,

CASE NO. 1:07-cv-21221-CMA

(Judge Cecilia M. Altonaga)

Plaintiffs,

vs.

MARS, Inc., et al.,

Defendants.

_____ /

**DECLARATION OF D. JEFFREY IRELAND IN SUPPORT OF
DEFENDANT THE IAMS COMPANY'S MOTION TO SEQUENCE
DOCUMENT PRODUCTION AND TO LIMIT PLAINTIFFS' DOCUMENT REQUESTS**

STATE OF OHIO)
) SS:
COUNTY OF MONTGOMERY)

D. Jeffrey Ireland declares:

1. I am an attorney licensed to practice law in the State of Ohio. I am an attorney for Defendant The Iams Company in the above-captioned matter. I am making this Declaration based upon personal knowledge and am competent to testify in the matters stated below.

2. On May 8, 2008, I sent a letter to Catherine J. MacIvor regarding discovery. Attached as Exhibit 1 to this Declaration is a true and accurate copy of that letter.

CASE NO. 07-21221-CIV-ALTONAGA/BROWN
DEFENDANT THE IAMS COMPANY'S MOTION TO SEQUENCE DOCUMENT
PRODUCTION AND TO LIMIT PLAINTIFFS' DOCUMENT REQUESTS

Exhibit B

3. On May 8, 2008, I received a letter from Catherine J. MacIvor regarding discovery. Attached as Exhibit 2 to this Declaration is a true and accurate copy of that letter.

4. On May 13, 2008, I sent a letter to Catherine J. MacIvor regarding discovery. Attached as Exhibit 3 to this Declaration is a true and accurate copy of that letter.

5. On May 7 and 9, 2008, Catherine J. MacIvor and I had several email communications. Attached as Exhibit 4 to this Declaration are true and accurate copies of those emails.

Pursuant to 28 U.S.C. § 1746, I declare under the penalty of perjury under the laws of the United States and the State of Ohio that the foregoing is true and correct.

Executed on May 16, 2008 in Dayton, Ohio.


D. JEFFREY IRELAND

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