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2 *Certified in Marital & Family Law*  
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3 *Certified in Wills, Trusts & Estates*  
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5 *Certified in Business Litigation*  
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6 *Florida Supreme Court*  
*Certified Civil Court Mediator*

REPLY TO:  
 Miami Office

April 17, 2008

**Via Electronic Mail/U.S. Mail /Facsimile**

Case 1:07-cv-21221-CMA Document 396-3 Entered on FLSD Docket 05/22/2008 P

Catherine J. MacIvor, Esquire  
 Maltzman Foreman, P.A.  
 2 South Biscayne Boulevard  
 Suite 2300  
 Miami, FL 33131

Subject: Blaszkowski, et al v. Mars, et al  
 CASE NO. 1:07-cv-21221-CMA

Dear Catherine:

As you know I serve as co-counsel along with the Faruki Ireland & Cox firm for the IAMS Company one of the defendants in the above-style cause. We have just concluded our initial review of your First, Second and Third Requests for Production which you served on IAMS. If my count is correct, between the three requests you propounded a sum total of 376 individually numbered requests for production. The scope and nature of those requests has raised significant questions and concerns on the part of IAMS as well as other Defendants relative to the requests propounded to them.

In order to avoid, if possible, the necessity of IAMS filing specific objections to a significant number of your requests as they now stand, I would like to have a meet and confer with you, as required by the Southern District's Local Rules, to see if we can resolve these problems.

In light of the enormous burden imposed on the Defendants by your combined requests I would also like to discuss the sensible prioritization of this discovery with particular focus on the parties discovery needs relative to any class certification hearing.

**Exhibit "A"**



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Since our responses are due to the three sets of requests during the week of May 12 and given your pending unavailability it is imperative that we speak next week. From your notices of unavailability it is my understanding that you would only be available for such a meet and confer Monday, Tuesday or Wednesday of this coming week (April 21-23). We would be happy to make ourselves available during that window for this discussion.

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In light of the foregoing I would greatly appreciate either you or someone from your office contacting me so that we can schedule this meeting. If you have any questions concerning the above please do not hesitate to contact me.

Sincerely,



Alan G. Greer

AGG:is

cc: Jeffrey Ireland, Esquire

