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April 16, 2008

VIA E-MAIL & U.S. MAIL

- Estate Planning
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Catherine J. MacIvor
Maltzman Foreman PA
2 S Biscayne Boulevard
Suite 2300 One Biscayne Tower
Miami, FL 33131-1803

Re: **Renee Blaszowski, et al. v. Mars Incorporated, et al.**
Case No. 07-21221-CIV-ALTONAGA/BROWN

Dear Ms. MacIvor:

I have been appointed by the defense counsel group to coordinate plaintiffs' deposition dates with you. We will need to take the depositions of all 33 named plaintiffs before being ready to respond to your anticipated class certification motion. Accordingly, we would like to get the depositions scheduled as soon as possible and were thinking that having them on successive days in Miami at Hogan & Hartson LLP would be the best for you and for us. Ideally, we would like to begin the depositions the week of May 12 having 3-5 depositions per week until completed, excluding the weeks of June 9 and June 16. We anticipate that each deposition will take at least a full 7 hours, so we would like to begin by 9:00 a.m.

The following is a proposed ordering for the depositions, which can be altered in any way necessary to accommodate plaintiffs' and counsels' schedules, except that we need to keep the week of June 9 and June 16 open because of conflicts among defense counsel.

- May 12-16: Renee Blaszowski; Claire Kotzampaltiris; Donna Hopkins-Jones; and Sharon Mathiesen
- May 26-29: Sandy Shore; Lou Wiggins; Raul Isern; and Danielle Valoras
- June 2-4: Cindy Tregoe; Marlana Rucker; and Tone Gaglione
- June 24-27: Deborah Hock; Marian Lupo; Jane Herring; and Patricia Hanrahan
- June 30-July 2: Michelle Lucarelli; Ann Quinn; and Patricia Davis
- July 7-11: Susan Peters; Linda Brown; Beth Wilson; Jo-Ann Murphy; and Stephanie Stone
- July 14-18: Debbie Rice; Carolyn White; Lisa MacDonald; Jennifer Damron; and Julie Nelson
- July 28-31: Debbie McGregor; Yvonne Thomas (others who need to reschedule)

Exhibit "C"

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If you have some other proposal regarding location, order and dates, we are open to considering any reasonable means to complete these in the short time available but we need to move quickly in order to have the depositions completed by July 31.

Please let me know before your unavailability begins on April 24 when we can get started with the plaintiffs' depositions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kristen E. Caverly", with a long horizontal flourish extending to the right.

Kristen E. Caverly

KEC/ns

cc: Defense Counsels – Via E-Mail only