

#### CASE NO. 07-21221-CIV-ALTONAGA/Brown

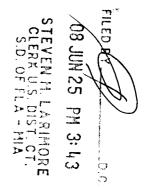
RENEE BLASZKOWSKI, et al., Individually and on behalf of Others similarly situated,

Plaintiffs,

VS.

MARS, INCORPORATED, et al.,

Defendants.



# MOTION FOR LIMITED APPEARANCE, CONSENT TO DESIGNATION AND REQUEST TO ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILINGS

In accordance with Local Rule 4.B of the Special Rules Governing the Admission and Practice of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission of:

Patrick N. Keegan, Esq.
KEEGAN & BAKER, LLP
4370 La Jolla Village Drive, Suite 640
San Diego, CA 92122
Telephone: (858) 552-6750
Facsimile: (858) 552-6749

Email: pkeegan@keeganbaker.com

for purposes of limited appearance as co-counsel on behalf of Plaintiffs Renee

Blaszkowski, Patricia Davis, Susan Peters, Deborah Hock, Beth Wilson, Claire Kotzampaltiris,

Donna Hopkins-Jones, 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, Danielle Valoras, Lisa MacDonald, Cindy Tregoe,

Jennifer Damron, Marlena Rucker, Julie Nelson, Yvonne Thomas, Debbie McGregor, Linda Brown, and Tone Gaglione, in the above-styled case only, and pursuant to Rule 2B, Southern District of Florida, CM/ECF Administrative Procedures, to permit Patrick N. Keegan, Esq. to receive electronic filings in this case, and in support thereof states as follows:

- 1. Patrick Keegan, Esq. is not admitted to practice in the Southern District of Florida and is a member in good standing of the State Bar of California, the United States District Court for the Southern District of California and the United States District Court for the Northern District of California.
- 2. Movant, Catherine McIvor, Esq. of the law firm of Maltzman Foreman, 2 South Biscayne Boulevard, Suite 2300, Miami, Florida, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida, maintains an office in this State for the practice of law, and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served, who shall be required to electronically file all documents and things that may be filed electronically, and who shall be responsible for filing documents in compliance with the CM/ECF Administrative Procedures. See Section 2B of the CM/ECF Administrative Procedures.
- 3. In accordance with the local rules of this Court, Patrick N. Keegan, Esq. has made payment of this Court's \$75 admission fee. A certification in accordance with Rule 4B is attached hereto.
- 4. Patrick N. Keegan, Esq. by and through designated counsel and pursuant to Section 2B, Southern District of Florida, CM/ECF Administrative Procedures, hereby requests

to provide Notice of Electronic Filings to Patrick N. Keegan, Esq. at email address: pkeegan@keeganbaker.com.

WHEREFORE, Catherine MacIvor, Esq. moves this Court to enter an Order permitting Patrick Keegan, Esq. to appear before this Court on behalf of Plaintiffs for all purposes relating to the proceedings in the above-styled manner and directing the Clerk to provide notice of electronic filings to Patrick N. Keegan, Esq.

# CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1 (3)

Prior to filing this motion, the undersigned conferred with counsel for Defendants in this case. The motion is unopposed.

# 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,

Plaintiffs,	
vs.	
MARS, INCORPORATED, et al.,	
Defendants.	

#### **CERTIFICATION OF PATRICK N. KEEGAN**

Patrick N. Keegan, Esq., pursuant to Rule 4B of the Special Rules Governing the Admission and Practice of Attorneys, hereby certifies that (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; and (2) I am a member in good standing of the State Bar of California, the United States District Court for the Southern District of California and the United States District Court for the Northern District of California.

Patrick N. Keegan, Esq.

# **CONSENT TO DESIGNATION**

Dated: 01500

Catherine J. MacIvor (FBN 932711)

E-mail: cmacivor@mflegal.com MALTZMAN FOREMAN PA

One Biscayne Tower

2 South Biscayne Boulevard, Suite 2300

Miami, FL 33131-1803 Telephone: (305) 358-6555

Facsimile: (305) 374-9077 Attorneys for Plaintiffs

Executed under penalty of perjury on this **1** day of June, Miami, Florida.

Respectfully submitted,

Catherine J. MacIvor (FBN 932711)

E-mail: cmacivor@mflegal.com MALTZMAN FOREMAN PA

One Biscayne Tower

2 South Biscayne Boulevard, Suite 2300

Miami, FL 33131-1803 Telephone: (305) 358-6555

Facsimile: (305) 374-9077

Attorneys for Plaintiffs

# **CERTIFICATE OF SERVICE**

WE HEREBY CERTIFY that the foregoing was electronically filed with the Clerk of the Court via CM/ECF on June 25, 2008. We also certify that the foregoing was served on all counsel or parties of record on the attached Service List either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronic Notices of Filing.

s/ Catherine J. MacIvor CATHERINE J. MACIVOR

# SERVICE LIST CASE NO. 07-21221 ALTONAGA/Brown

#### **CATHERINE J. MACIVOR**

cmacivor@mflegal.com

**JEFFREY B. MALTZMAN** 

imaltzman@mflegal.com

**JEFFREY E. FOREMAN** 

jforeman@mflegal.com

DARREN W. FRIEDMAN

dfriedman@mflegal.com

MALTZMAN FOREMAN, PA

One Biscayne Tower

2 South Biscayne Boulevard -Suite 2300

Miami, Florida 33131

Tel: 305-358-6555 / Fax: 305-374-9077

Attorneys for Plaintiffs

#### **ROLANDO ANDRE S DIAZ**

E-Mail: rd@kubickdraper.com

**MARIA KAYANAN** 

E-Mail: mek@kubickidraper.com

#### **KUBICKI DRAPER**

25 W. Flagler Street

Penthouse

Miami, Florida 33130-1712

Telephone: (305) 982-6708 Facsimile: (305) 374-7846

Attorneys for Defendant Pet Supermarket, Inc.

#### JOHN B.T. MURRAY, JR.

E-Mail: jbmurray@ssd.com

**ROBIN L. HANGER** 

E-Mail: rlhanger@ssd.com

#### **SQUIRE, SANDERS & DEMPSEY LLP**

1900 Phillips Point West

777 South Flagler Drive

West Palm Beach, Florida 33401-6198

Telephone: (561) 650-7200

Facsimile: (561) 655-1509

Attorneys for Defendants PETCO Animal Supplies Stores Inc., PetSmart, Inc., Wal-Mart Stores,

Inc. and Target Corporation

#### **ALEXANDER SHAKNES**

E-Mail: Alex.Shaknes@dlapiper.com

**AMY W. SCHULMAN** 

E-Mail: Amy.schulman@dlapiper.com

LONNIE L. SIMPSON

E-Mail: Lonnie.Simpson@dlapiper.com

S. DOUGLAS KNOX

E-Mail: Douglas.knox@dlapiper.com

#### DLA PIPER RUDNICK GRAY CARY US LLP

1251 Avenue of the Americas

New York, New York 10020

Telephone: (212) 335-4829

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

#### **WILLIAM C. MARTIN**

E-Mail: william.martin@dlapiper.com

#### DLA PIPER RUDNICK GRAY CARY US LLP

203 North LaSalle Street

**Suite 1900** 

Chicago, Illinois 60601-1293

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

#### **GARY L. JUSTICE**

E-Mail: gjustice@gibsondunn.com

#### **CHARLES H. ABBOTT**

E-Mail: cabbott@gibsondunn.com

GAIL E. LEES

E-Mail: glees@gibsondunn.com

# WILLIAM EDWARD WEGNER

E-Mail: wwegner@gibsondunn.com

# GIBSON DUNN & CRUTCHER LLP 333 South Grand Avenue, Suite 4600 Los Angeles,

California 90071-3197

Telephone: (213) 229-7000

Attorneys for Defendant Nutro Products, Inc.

#### **OMAR ORTEGA**

Email: ortegalaw@bellsouth.net

#### **DORTA & ORTEGA, P.A.**

Douglas Entrance

800 S. Douglas Road, Suite 149

Coral Gables, Florida 33134

Telephone: (305) 461-5454 Facsimile: (305) 461-5226

Attorneys for Defendant Mars, Inc. and Mars Petcare U.S.

#### HUGH J. TURNER, JR.

E-Mail: hugh.turner@akerman.com

#### **AKERMAN SENTERFITT & EDISON**

350 E. Las Olas Boulevard Suite 1600

Fort Lauderdale, Florida 33301-2229

Telephone: (954)463-2700 Facsimile: (954)463-2224

Attorneys for Defendant Publix Super Markets, Inc.

#### **MARTY STEINBERG**

E-Mail: msteinberg@hunton.com

#### ADRIANA RIVIERE-BADELL

E-Mail: ariviere-badell@hunton.com

#### **HUNTON & WILLIAMS**

Mellon Financial Center

1111 Brickell Avenue, Suite 2500

Miami, Florida 33131

Telephone: (305) 810-2500 Facsimile: (305) 810-2460

Attorneys for Defendant Nutro Products, Inc.

#### DANE H. BUTSWINKAS

E-Mail: dbutswinkas@wc.com

PHILIP A. SECHLER

E-Mail: psechler@wc.com

THOMAS G. HENTOFF

E-Mail: thentoff@wc.com

#### PATRICK J. HOULIHAN

E-Mail: phoulihan@wc.com

#### WILLIAMS & CONNOLLY LLP

725 12<sup>th</sup> Street, N.W.

Washington, DC 20005

Telephone: (202)434-5000

Attorneys for Defendants Mars, Incorporated and Mars Petcare U.S.

#### **BENJAMIN REID**

E-Mail: bried@carltonfields.com

ANA CRAIG

E-Mail: acraig@carltonfields.com

#### **CARLTON FIELDS, P.A.**

100 S.E. Second Street, Suite 4000

Miami, Florida 33131-0050

Telephone: (305)530-0050 Facsimile: (305) 530-0050

Attorneys for Defendants Colgate-Palmolive Company and Hill's Pet Nutrition, Inc.

# KARA L. McCALL

kmccall@sidley.com

# SIDLEY AUSTIN LLP

One S. Dearborn Street

Chicago, ILL 60633

Telephone: (312) 853-2666

Attorneys for Defendants Colgate-Palmolive Company and Hill's Pet Nutrition, Inc.

#### SHERRIL M. COLOMBO

E-Mail: scolombo@cozen.com

#### COZEN O'CONNOR

200 South Biscayne Boulevard Suite 4410

Miami, Florida 33131

Telephone: (305) 704-5945 Facsimile: (305) 704-5955

Attorneys for Defendant Del Monte Foods Co.

#### JOHN J. KUSTER

jkuster@sidley.com

#### JAMES D. ARDEN

jarden@sidley.com

#### SIDLEY AUSTIN LLP

787 Seventh Avenue

New York, New York 10019-6018

Telephone: (212) 839-5300

Attorneys for Defendants Colgate-Palmolive Company and Hill's Pet Nutrition, Inc.

#### RICHARD FAMA

E-Mail: rfama@cozen.com

#### JOHN J. McDONOUGH

E-Mail: jmcdonough@cozen.com

# COZEN O'CONNOR

45 Broadway

New York, New York 10006

Telephone: (212) 509-9400 Facsimile: (212) 509-9492

Attorneys for Defendant Del Monte Foods

#### C. RICHARD FULMER, JR.

E-Mail: rfulmer@Fulmer.LeRoy.com

FULMER, LEROY, ALBEE, BAUMANN, & GLASS

2866 East Oakland Park Boulevard

Fort Lauderdale, Florida 33306

Telephone: (954) 707-4430 Facsimile: (954) 707-4431

Attorneys for Defendant The Kroger Co. of Ohio

#### JOHN F. MULLEN

E-Mail: jmullen@cozen.com

# COZEN O'CONNOR

1900 Market Street

Philadelphia, PA 19103

Telephone: (215) 665-2179 Facsimile: (215) 665-2013

Attorneys for Defendant Del Monte Foods, Co.

#### ROBERT C. TROYER

E-Mail: rctroyer@hhlaw.com

#### **HOGAN & HARTSON**

1200 17<sup>th</sup> Street

One Tabor Center, Suite 1500

Denver, Colorado 80202

Telephone: (303) 899-7300 Facsimile: (303) 899-7333

Attorneys for Defendants Nestle U.S.A., Inc. and Nestle Purina Petcare Co.

#### **JAMES K. REUSS**

E-Mail: jreuss@lanealton.com

#### LANE ALTON & HORST

Two Miranova Place

Suite 500

Columbus, Ohio 43215

Telephone: (614) 233-4719

Attorneys for Defendant The Kroger Co. of Ohio

#### **CAROL A. LICKO**

E-Mail: calicko@hhlaw.com

#### **HOGAN & HARTSON**

Mellon Financial Center

1111 Brickell Avenue, Suite 1900

Miami, Florida 33131

Telephone (305) 459-6500

Facsimile (305) 459-6550

Attorneys for Defendants Nestle U.S.A., Inc. and Nestle Purina Petcare Co.

#### **CRAIG A. HOOVER**

E-Mail: cahoover@hhlaw.com

MIRANDA L. BERGE

# E-Mail: mlberge@hhlaw.com

# **HOGAN & HARTSON L.L.P.**

555 13<sup>th</sup> Street, N.W.

Washington, D.C. 20004

Telephone: (202) 637-5600 Facsimile: (202) 637-5910

Attorneys for Defendants Nestle U.S.A., Inc. and Nestle Purina Petcare Co.

#### ALAN G. GREER

agreer@richmangreer.com

# RICHMAN GREER WEIL BRUMBAUGH MIRABITO & CHRISTENSEN

201 South Biscayne Boulevard

**Suite 1000** 

Miami, Florida 33131

Telephone: (305) 373-4000 Facsimile: (305) 373-4099

Attorneys for Defendants Proctor & Gamble Co. and The Iams Co.

#### D. JEFFREY IRELAND

E-Mail: djireland@ficlaw.com

**BRIAN D. WRIGHT** 

E-Mail: bwright@ficlaw.com

LAURA A. SANOM

E-Mail: lsanom@ficlaw.com

# FARUKI IRELAND & COX

500 Courthouse Plaza, S.W.

10 North Ludlow Street

Dayton, Ohio 45402

Attorneys for Defendant Proctor & Gamble Co. and The Jams Co.

#### RALPH G. PATINO

E-Mail: rpatino@patinolaw.com

# DOMINICK V. TAMARAZZO

E-Mail: dtamarazzo@patinolaw.com

**CARLOS B. SALUP** 

E-Mail: csalup@patinolaw.com

#### PATINO & ASSOCIATES, P.A.

225 Alcazar Avenue

Coral Gables, Florida 33134

Telephone: (305) 443-6163 Facsimile: (305) 443-5635

Attorneys for Defendants Pet Supplies "Plus" and Pet Supplies Plus/USA, Jnc.

#### CRAIG P. KALIL

E-Mail: ckalil@aballi.com

# JOSHUA D. POYER

E-Mail: jpoyer@abailli.com

#### ABALLI MILNE KALIL & ESCAGEDO

2250 Sun Trust International Center

One S.E. Third Avenue

Miami, Florida 33131

Telephone: (303) 373-6600 Facsimile: (305) 373-7929

Attorneys for New Albertson 's Jnc. and Albertson 's LLC

#### **JEFFREY S. YORK**

E-Mail: jyork@mcguirewoods.com

MICHAEL GIEL

E-Mail: mgiel@mcguirewoods.com

#### McGUIRE WOODS LLP

50 N. Laura Street, Suite 3300

Jacksonville, FL 32202

Telephone: (904) 798-2680

Facsimile: (904) 360-6330

Attorneys for Defendant Natura Pet Products, Jnc.

#### W. RANDOLPH TESLIK

E-Mail: rteslik@akingump.com

#### ANDREW J. DOBER

E-Mail: adober@akingump.com

# AKIN GUMP STRAUSS HAUER & FELD LLP

1333 New Hampshire Avenue, NW

Washington, D.C. 20036

Telephone: (202) 887-4000 Facsimile: (202) 887-4288

Attorneys for Defendants New Albertson 's Jnc. and Albertson 's LLC

#### KRISTEN E. CAVERLY

E-Mail: kcaverly@hcesq.com

#### **HENDERSON & CAVERLY LLP**

16236 San Dieguito Road, Suite 4-13

P.O. Box 9144 (all US Mail)

Rancho Santa Fe, CA 92067-9 144

Telephone: 858-756-6342 x)101 Facsimile: 858-756-4732

Attorneys for Natura Pet Products, Jnc.

# 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,

Plaintiffs,

VS.

MARS, INCORPORATED, et al.,

~	~	1		
11	efe	ุกก	วท	tc
ப	-1	'II'U	ш	uo.

# ORDER GRANTING MOTION FOR LIMITED APPEARANCE OF PATRICK N. KEEGAN, CONSENT TO DESIGNATION AND REQUEST TO ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILINGS

THIS CAUSE having come before the Court on the Motion for Limited Appearance of Patrick N. Keegan, Esq. and Consent to Designation, requesting, pursuant to Rule 4B of the Special Rules Governing the Admission and Practice of Attorneys in the United States District Court for the Southern District of Florida, permission for a limited appearance of Patrick N. Keegan, Esq. in this matter and request to electronically receive notice of electronic filings. This Court having considered the motion and all other relevant factors, it is hereby

# ORDERED and ADJUDGED that:

The Motion for Limited Appearance, Consent to Designation and Request to Electronically Receive Notices of Electronic Filings is GRANTED. Patrick N. Keegan, Esq. is granted to appear and participate in this action on behalf of Plaintiffs Renee Blaszkowski, Patricia Davis,

Susan Peters, Deborah Hock, Beth Wilson, Claire Kotzampaltiris, Donna Hopkins-Jones, 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, Danielle Valoras, Lisa MacDonald, Cindy Tregoe, Jennifer Damron, Marlena Rucker, Julie Nelson, Yvonne Thomas, Debbie McGregor, Linda Brown, and Tone Gaglione. The Clerk shall provide electronic notification of all electronic filings to Patrick N. Keegan at pkeegan@keeganbaker.com.

DONE AND ORDER	ED in Chambers at	, Florida this
day of	·	
	United States T	District Indoe

Copies furnished to: All Counsel of Record