

# **EXHIBIT H**

# MALTZMAN FOREMAN

ATTORNEYS AT LAW

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## VIA ELECTRONIC TRANSMISSION

Kristin Caverly, Esquire  
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**RE: *Blaskowski et al. vs. Mars Inc., et al.***  
**Case No. 07-21221 – CIV-Altonaga/Brown**

Dear Kristin,

Per our prior telephone discussion, my office received your April 16, 2008 letter concerning the Plaintiffs' proposed deposition schedules when I was out of the office and at a time when I was scheduled to be out of the office again shortly thereafter (with only four (4) days in the office in between). As you know, I advised you at the time that the schedule that you proposed was not feasible for me because I have two cases that were set for trial and must attend at least two to three depositions per week through July on each of these cases. Moreover, I will be in Taiwan attending depositions in these cases for the first two weeks of June.

Per our discussion, I advised you that I would propose alternate dates that would work for the Plaintiffs and with my schedule. I also suggested that because defense counsel are located in various cities in and around the United States that we have these depositions closer to the Plaintiffs homes since many of them have companion cats and dogs that are ill and need attention and leaving them with veterinary professionals would work a hardship on not only the Plaintiffs, but it would be very stressful for their cats and dogs.

In addition to the depositions that I must attend in these other cases, I am contemporaneously working with the Plaintiffs to respond to the Defendants' very broad discovery requests, which will require the production of massive amounts of information. Even with the thirty day extension that you recently gave me, I will only be able to formally respond to them in writing and produce some of the documents, while others will have to be produced on a rolling basis. I am quite sure that the Defendants want the documents prior to the depositions and this schedule also takes that into consideration.

Please see the proposed schedule below:

**PROPOSED PLAINTIFFS' DEPOSITION SCHEDULE**

**NEW YORK**

Claire Kotzampaltiris	August 4
Donna Hopkins-Jones	August 5
Yvonne Thomas	August 6
Tone Gaglione	August 7
Michelle Lucarelli	August 8

**MIAMI**

Pat Davis	August 26
Raul Isern	August 27
Renee Blaszkowski	August 28
Danielle Valoras	August 29
Lisa MacDonald	August 30***

**LAS VEGAS**

Patricia Hanrahan	September 8
Ann Quinn	September 9
Deborah Hock	September 10
Marlena Rucker	September 11
Sandy Shore	September 12

**WASHINGTON, DC**

Stephanie Stone	September 22
Jane Herring	September 23***
Joanne Murphy	September 24
Jennifer Damron	September 25
Carolyn White	September 26
Cindy Tregoe	September 29
Marian Lupo	September 30

**ST. LOUIS**

Beth Wilson	October 7
Debbie Rice	October 8
Susan Peters	October 9
Lou Wiggins	October 10
Sharon Mathiesen	October 13***

Julie Nelson

October 14

**MINNEAPOLIS (in person or via video conference due to health reasons)**

Linda Brown

August 18-20

The asterisks next to some Plaintiffs' names indicate that I have not confirmed that particular Plaintiff's availability yet, but expect to do so by the end of the week. Deborah McGregor will be dismissing her claim because she was recently diagnosed with an illness that will necessitate her full attention. As I am sure you can imagine, many of the Plaintiffs work and have already made other commitments prior to your request for their depositions. It took quite a bit of logistical coordination for me and them to clear dates and for me to work out this proposal. Based upon my previous notice of unavailability, I have only actually had twelve (12) business days in the office since you sent me your proposed schedule to contact thirty (30) Plaintiffs and coordinate this schedule.

Very truly yours,

*Sent in her absence to avoid delay*

Catherine J. MacIvor

cc: All defense counsel of record