

EXHIBIT 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

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

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

Plaintiffs,

vs.

MARS, INCORPORATED, *et al.*,

Defendants.

**DEFENDANT NATURA PET PRODUCTS, INC.'S JOINT FIRST SET OF
INTERROGATORIES TO PLAINTIFF RENEE BLASZOWSKI**

Defendant Natura Pet Products, Inc, by their undersigned attorneys, propound the following interrogatories upon Plaintiff Renee Blaszowski and request that they be answered separately, fully, and under oath within thirty days of service pursuant to Federal Rule of Civil Procedure 33 and Local Rule 26.1.G.

DEFINITIONS

1. The words “you,” “yours” and/or “yourselves” mean Plaintiff Renee Blaszowski and any spouse, relative, directors, officers, employees, agents, investigators, representatives or other persons or entities acting, or purporting to act, on behalf of Plaintiff Renee Blaszowski.
2. The singular shall include the plural and vice versa; the terms “and” or “or” shall be both conjunctive and disjunctive; and the term “including” mean “including without limitation.”
3. “Date” shall mean the exact date, month and year, if ascertainable or, if not, the best approximation of the date (based upon relationship with other events).

4. The word “document” shall mean any writing, drawing, graph, chart, recording, electronically stored information, photograph, or other data compilation from which you can obtain information that is in your actual or constructive possession, custody, care or control, which pertains directly or indirectly, in whole or in part, either to any of the subjects listed below or to any other matter relevant to the issues in this action, or which are themselves listed below as specific documents, including, but not limited to: correspondence, memoranda, notes, messages, email communications, instant messages, electronic postings, weblogs, diaries, minutes, books, reports, charts, ledgers, invoices, receipts, computer printouts, PowerPoint or other software or computer-based presentations, microfilms, video tapes or tape recordings, transcripts of video tapes or tape recordings, pet food packaging, pet food labels, advertisements, transcripts of advertisements, point of sale information, veterinarian or hospital invoices, reports or records.

5. “Agent” shall mean: any agent, employee, officer, director, attorney, independent contractor or any other person acting at the direction of or on behalf of another.

6. “Person” shall mean any individual, corporation, proprietorship, partnership, trust, association or any other entity.

7. The words “pertain to” or “pertaining to” mean: relates to, refers to, contains, concerns, describes, embodies, mentions, constitutes, constituting, supports, corroborates, demonstrates, proves, evidences, shows, refutes, disputes, rebuts, controverts or contradicts.

8. “Pet” shall mean any cat or dog for which you purchased or provided food at any time since May 9, 2003.

9. “Food” shall mean any food, whether or not marketed for pets, that is consumed by pets, including items commonly identified in the marketplace as pet treats.

10. The term “action” shall mean the case entitled *Renee Blaszkowski, et al. v. Mars, Inc., et al.*, Case No. 07-21221, pending in the United States District Court for the Southern District of Florida.

11. The term “Complaint” shall mean the operative complaint filed in this action.

12. The word “identify”, when used in reference to a document (including electronically stored information), means and includes the name and address of the custodian of the document, the location of the document, and a general description of the document, including (1) the type of document (*e.g.*, letter or memorandum) and, if electronically stored information, the software application used to create it (*e.g.*, MS Word or MS Excel Spreadsheet); (2) the general subject matter of the document or electronically stored information; (3) the date of the document or electronically stored information; (4) the author of the document or electronically stored information; (5) the addressee of the document or electronically stored information; and (6) the relationship of the author and addressee to each other.

13. “Identify” or “state the identity of”, when used with respect to a natural person or pet (as defined above), means to provide the following:

- a. full name and any alias, including user names, screen names and registered reader names used in connection with posting comments to websites;
- b. current or last known home address;
- c. current or last known business address;
- d. current or last known employment position; and
- e. relationship if any, to the parties in this action.

INSTRUCTIONS

1. You shall answer each interrogatory fully, in writing and under oath, unless it is objected to, in which event the reasons for the objections shall be stated in lieu of an answer. Your answers shall include all information available to you, including hearsay, which is in the possession, custody, or control of you, your agents, or attorneys. If you cannot provide all of the information requested in each interrogatory, you should provide the information which you can provide and explain all efforts made to obtain the information which you are unable to provide.

2. If you object to fully identifying a document, electronically stored information or oral communication because of a privilege, you must nevertheless provide the following information pursuant to Local Rule 26.1.G.3.(b), unless divulging the information would disclose the privileged information:

- a. the nature of the privilege claimed (including work product);
- b. if the privilege is being asserted in connection with a claim or defense governed by state law, the state privilege rule being invoked;
- c. the date of the document, electronically stored information or oral communication;
- d. if a document: its type (*e.g.*, letter or memorandum) and, if electronically stored information, the software application used to create it (*e.g.*, MS Word or MS Excel Spreadsheet), and the custodian, location, and such other information sufficient to identify the material for a subpoena *duces tecum* or a production request, including where appropriate the author, the addressee, and, if not apparent, the relationship between the author and addressee;

- e. if an oral communication: the place where it was made, the names of the persons present while it was made, and, if not apparent, the relationship of the persons present to the declarant; and
- f. the general subject matter of the document, electronically stored information or oral communication.

3. You are under a continuous obligation to supplement your answers to these interrogatories under the circumstances specified in Federal Rule of Civil Procedure 26(e).

INTERROGATORIES

1. Please provide the name, address, telephone number, place of employment and job title of any person who has, claims to have or whom you believe may have knowledge or information pertaining to any fact alleged in the pleadings (as defined in Federal Rule of Civil Procedure 7(a)) filed in this action, or any fact underlying the subject matter of this action.

2. Please provide the name of each person whom you may use as an expert witness at the class certification hearing.

3. For each person identified in Interrogatory No. 2, please state in detail the substance of the opinions to be provided by that person.

4. Please identify each document (including electronically stored information) pertaining to any fact alleged in any pleading (as defined in Federal Rule of Civil Procedure 7(a) filed in this action).

5. Please state each item of damage that you claim, whether as an affirmative claim or as a setoff, and include in your answer: the count or defense to which the item of damages relates; the category into which each item of damages falls, *i.e.*, general damages, special or consequential damages (such as lost profits), interest, and any other relevant categories; the

factual basis for each item of damages; and an explanation of how you computed each item of damages, including any mathematical formula used.

Respectfully submitted,

/s/ Kristen E. Caverly

KRISTEN E. CAVERLY, (CBN 175070)

kcaverly@hcesq.com

HENDERSON & CAVERLY LLP

P.O. Box 9144

16236 San Dieguito Road, #4-13

Rancho Santa Fe, CA 92067

Tel: 858-756-6342/ Fax: 858-756-4732

*Attorneys for Defendant Natura Pet Products
Inc.*

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that the foregoing was sent via electronic mail to all counsel on the attached service list on April 16, 2008.

/s/ Kristen E. Caverly

Kristen E. Caverly

CERTIFICATE OF SERVICE
RENEE BLASZOWSKI, ET AL., VS. MARS, INCORPORATED, ET AL.
Case No. 07-21221-CIV-ALTONAGA/TURNOFF
SERVICE LIST

Catherine J. MacIvor
E-mail: cmacivor@mflegal.com
Jeffrey Eric Foreman
E-mail: jforeman@mflegal.com
Jeffrey Bradford Maltzman
E-mail: jmaltzman@mflegal.com
Darren W. Friedman
E-mail: dfriedman@mflegal.com
Bjorg Eikeland
E-mail: beikeland@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

John B.T. Murray, Jr.
E-mail: jbmurray@ssd.com
SQUIRE, SANDERS&DEMPSEY L.L.P.
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., Target Corporation and Meijer,
Inc.*

Rolando Andres Diaz
E-Mail: rd@kubickdraper.com
Cassidy Yen Dang
E-mail: cyd@kubickdraper.com
Maria Kayanan
E-mail: mek@kubickdraper.com
KUBICKI DRAPER
25 W. Flagler Street

Penthouse
Miami, FL 33130-1712
Telephone: (305) 982-6708
Facsimile: (305) 374-7846
Attorneys for Defendant Pet Supermarket, Inc.

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 LLP
1251 Avenue of the Americas
New York, New York 10020
*Attorneys for Defendants Menu Foods, Inc.
and Menu Foods Income Fund*

William C. Martin
DLA PIPER LLP
203 North LaSalle Street
Suite 1900
Chicago, Illinois 60601-1293
E-mail: William.Martin@dlapiper.com
*Attorneys for Defendants Menu Foods, Inc.
and Menu Foods Income Fund*

Hugh J. Turner, Jr.
AKERMAN SENTERFITT
350 E. Las Olas Boulevard
Suite 1600
Fort Lauderdale, FL 33301-2229
Telephone: (954) 463-2700
Facsimile: (954) 463-2224
E-mail: hugh.turner@akerman.com
*Attorneys for Defendants Publix Super
Markets, Inc and H.E. Butt Grocery Co.*

Gary L. Justice
E-mail: gjustice@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
Los Angeles, California 90071
Telephone: (213) 229-7000
Attorneys for Defendant Nutro Products, Inc.

Marty Steinberg
E-mail: msteinberg@hunton.com
Adriana Riviere-Badell
E-mail: ariviere-badell@hunton.com

HUNTON&WILLIAMS, LLP

Mellon Financial Center
1111 Brickell Avenue, Suite 2500
Miami, FL 33131
Telephone: (305) 810-2500
Facsimile: (305) 810-2460
Attorneys for Defendant Nutro Products, Inc.

Omar Ortega

DORTA AND ORTEGA, P.A.

Douglas Entrance
800 S. Douglas Road, Suite 149
Coral Gables, Florida 33134
Telephone: (305) 461-5454
Facsimile: (305) 461-5226
E-mail: oortega@dortaandortega.com
*Attorneys for Defendant Mars, Incorporated
and Mars Petcare U.S.*

Dane H. Butswinkas
E-mail: dbutswinkas@wc.com

Philip A. Sechler
E-mail: psechler@wc.com

Thomas G. Hentoff
E-mail: thentoff@wc.com

Christopher M. D'Angelo
E-mail: cdangelo@wc.com

Patrick J. Houlihan
E-mail: phoulihan@wc.com

WILLIAMS & CONNOLLY LLP

725 Twelfth Street, N.W.
Washington, D.C. 20005
*Attorneys for Defendants Mars, Incorporated
and Mars Petcare U.S.*

Benjamine Reid
E-mail: breid@carltonfields.com
Olga M. Vieira
E-mail: ovieira@carltonfields.com
CARLTON FIELDS, P.A.
100 S.E. Second Street, Suite 4000
Bank of America Tower at International Place
Miami, Florida 33131-9101
Telephone: (305) 530-0050
Facsimile: (305) 530-0055
*Attorneys for Defendants Colgate-Palmolive
Company and Hill's Pet Nutrition, Inc.*

John J. Kuster
E-mail: jkuster@sidley.com
James D. Arden
E-mail: jarden@sidley.com
SIDLEY AUSTIN LLP
787 Seventh Avenue
New York, NY 10019
Telephone: (212) 839-5300
Facsimile: (212) 839-5599
*Attorneys for Defendants Colgate-Palmolive
Company and Hill's Pet Nutrition, Inc.*

Kara L. McCall
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, Illinois 60603
Telephone: (312) 853-2666
E-mail: kmccall@Sidley.com
*Attorneys for Defendants Colgate-Palmolive
Company and Hill's Pet Nutrition, Inc.*

Marcos Daniel Jiménez
E-mail: mdj@kennynachwalter.com
Robert J. Alwine II
E-mail: ralwine@kennynachwalter.com
KENNY NACHWALTER, P.A.
1100 Miami Center
201 South Biscayne Boulevard
Miami, Florida 33131
Telephone: (305) 373-1000
Facsimile: (305) 372-1861
*Attorneys for Defendants Safeway, Inc. and
The Stop & Shop Supermarket Company LLC*

Sherril M. Colombo
COZEN O'CONNOR
Wachovia Center, Suite 4410
200 South Biscayne Boulevard
Miami, FL 33131
Telephone: (305) 704-5945
Facsimile: (305) 704-5955
E-mail: scolombo@cozen.com
Attorneys for Defendant Del Monte Foods, Co.

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

John F. Mullen
COZEN O'CONNOR
1900 Market Street
Philadelphia, PA 19103
Telephone: (215) 665-2179
Facsimile: (215) 665-2013
E-mail: jmullen@cozen.com
Attorneys for Defendant Del Monte Foods, Co.

Carol A. Licko
HOGAN&HARTSON L.L.P.
Mellon Financial Center
1111 Brickell Avenue, Suite 1900
Miami, FL 33131
Telephone: (305) 459-6500
Facsimile: (305) 459-6550
E-mail: calicko@hhlaw.com
*Attorneys for Defendants Nestlé USA, Inc. and
Nestlé Purina Petcare Co.*

Robert C. Troyer
HOGAN&HARTSON L.L.P.
1200 17th Street
One Tabor Center, suite 1500

Denver, Colorado 80202
Telephone: (303) 899-7300
Facsimile: (303) 899-7333
E-mail: rctroyer@hhlaw.com
*Attorneys for Defendants Nestlé USA, Inc. and
Nestlé 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 13TH Street, NW
Washington, D.C. 20004
Telephone: (202) 637-5600
Facsimile: (202) 637-5910
*Attorneys for Defendants Nestlé USA, Inc. and
Nestlé Purina Petcare Co.*

James K. Reuss
LANE ALTON & HORST, LLC
Two Miranova Place
Suite 500
Columbus, Ohio 43215
Telephone: (614) 233-4719
E-mail: JReuss@lanealton.com
*Attorneys for Defendant The Kroger Co. of
Ohio*

Alan G. Greer
RICHMAN GREER, P.A.
Miami Center – Suite 1000
201 South Biscayne Boulevard
Miami, FL 33131
Telephone: (305) 373-4000
Facsimile: (305) 373-4099
E-mail: agreer@richmangreer.com
*Attorneys for Defendants Procter & 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 P.L.L.
500 Courthouse Plaza, S.W.
10 North Ludlow Street
Dayton, Ohio 45402
*Attorneys for Defendant Procter & Gamble
Co. and The Iams Co.*

Robin L. Hanger
SQUIRE, SANDERS&DEMPSEY L.L.P.
200 S. Biscayne Boulevard
40th Floor
Miami, Florida 33131-2398
Telephone: (305) 577-7040
Facsimile: (305) 577-7001
E-mail: rlhanger@ssd.com
*Attorneys for Defendants PETCO Animal
Supplies Stores, Inc.*

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, Inc.*

Robert Valadez
E-mail: rvaladez@shelton-valadez.com
Javier Thomas Duran
E-mail: jduran@shelton-valadez.com
SHELTON&VALADEZ, P.C.
600 Navarro, Suite 500
San Antonio, Texas 78205
Telephone: (210) 349-0515
Facsimile: (210) 349-3666
Attorneys for Defendant H.E. Butt Grocery Co.

Craig P. Kalil
E-mail: ckalil@aballi.com
Joshua D. Poyer

E-mail: jpoyer@abailli.com
**ABALLI, MILNE, KALIL & ESCAGEDO,
P.A.**
2250 Sun Trust International Center
One Southeast Third Avenue
Miami, Florida 33131
Telephone: (305) 373-6600
Facsimile: (305) 373-7929
*Attorneys for Defendants New Albertson's Inc.
and Albertson's LLC*

W. Randolph Teslik
E-mail: rteslik@akingump.com
Andrew Dober
E-mail: adober@akingump.com
**AKIN GUMPSTRAUSS 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 Inc.
and Albertson's LLC*

C. Richard Fulmer, Jr.
**FULMER, LeROY, ALBEE, BAUMANN &
GLASS, PLC**
2866 East Oakland Park Boulevard
Fort Lauderdale, Florida 33306
Telephone: (954) 707-4430
Facsimile: (954) 707-4431
E-mail: rfulmer@Fulmer.LeRoy.com
*Attorneys for Defendant The Kroger Co. of
Ohio*

Jason Joffe
SQUIRE SANDERS & DEMPSY, LLP
200 South Biscayne Boulevard
Suite 4000
Miami, Florida 33131
Telephone: (305) 577-7000
Facsimile: (305) 577-7001
E-mail: jjoffe@ssd.com
Attorneys for Defendant Meijer, Inc.
Mark Whitburn
E-mail: mwhitburn@gibsondunn.com

GIBSON, DUNN & CRUTCHER LLP

2100 McKinney Avenue

Suite 1100

Dallas, Texas 75201

Telephone: (214) 698-3100

Attorneys for Nutro Products, Inc.