

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/Class Representatives,
vs.

MARS INC., *et al.*

Defendants.

**DECLARATION OF PATRICK N. KEEGAN SUPPORTING
PLAINTIFFS' OPPOSITION TO DEFENDANTS'
MOTION TO COMPEL DEPOSITIONS OF PLAINTIFFS**

I, Patrick N. Keegan, declare and state as follows:

1. I am a partner at Keegan & Baker, LLP, co-counsel for Plaintiffs with Catherine J. MacIvor of Maltzman Foreman, PA. I have personal knowledge of the facts and issues set forth in this Declaration.

2. My firm became co-counsel in this matter in June 2008, last month, and we have not yet completed our communications with these Plaintiffs, reviewed the file, and legal research and factual investigations necessary to participation in these depositions..

3. On July 28, 2008, I participated in a telephonic conference call with Defendants' counsel wherein we discussed the scheduling of Plaintiffs' depositions. As a result of counsels' efforts, Plaintiffs have agreed to the deposition schedule originally proposed by Defendants,

except for the change of the Plaintiffs' depositions during the week of August 4th to the week of September 15th. Specifically, Plaintiffs' counsel agreed to stipulate to the rescheduling of Plaintiffs' depositions during the week of August 4th to the week of September 15th in as follows:

- September 16th – Deposition of Claire Kotzampaltiris in New York;
- September 17th – Deposition of Donna Hopkins-Jones in New York;
- September 18th – Deposition of Tone Gaglione in New York;
- September 19th – Deposition of Michelle Lucarelli in New York.

The parties have also agreed that Plaintiffs could switch dates during September 16th – 19th with prior notice to counsel for Defendants.

4. To the best of my knowledge, there are currently no dispositive motions, ADR, hearings, or other matters between now and Plaintiffs' stipulated dates as set forth above that would necessitate "good cause" for earlier dates than those which Plaintiffs have now agreed to.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 28th day of July, 2008.

/s/ _____
Patrick N. Keegan