

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.

**NON-NATURA DEFENDANTS' RESPONSE TO PLAINTIFFS'
MOTION TO ADD AND/OR SUBSTITUTE ARNA CORTAZZO
AS A PLAINTIFF/CLASS REPRESENTATIVE**

Defendants¹, except for Natura Pet Products, Inc. ("Natura"), respond to Plaintiffs' Motion to Add and/or Substitute Arna Cortazzo as a Plaintiff/Class Representative ("Motion to Add/Substitute Arna Cortazzo") [Doc. 457] to correct Plaintiffs² misstatements, including those about the scope of the release in the Settlement Agreement in the Multi-District Litigation pending in the United States District Court for the District of New Jersey known as In re Pet

¹ Defendants The Iams Company, Del Monte Foods, Co., Hill's Pet Nutrition, Inc., Nestlé Purina Petcare Co., PETCO Animal Supplies Stores, Inc., PetSmart, Inc., Wal-Mart Stores, Inc., Target Corporation, Pet Supermarket, Inc, Menu Foods, Inc. and Menu Foods Income Fund, Mars, Incorporated, Mars Petcare U.S., Inc. and Nutro Products, Inc., Publix Super Markets, Inc., New Albertson's Inc., Albertson's LLC, Pet Supplies "Plus" and Pet Supplies Plus/USA, Inc., and The Kroger Co. of Ohio (collectively "Non-Natura Defendants").

² Plaintiffs Renee Blaszkowski, Patricia Davis, Susan Peters, Deborah Hock, Beth Wilson, Claire Kotzampaliris, Donna Hopkins-Jones, Marian Lupo, Jane Herring, Jo Ann Murphy, Stephanie Stone, Patricia Hanrahan, Ann Quinn, Sharon Mathiesen, Sandy Shore, Carolyn White, Lou Wiggins, Michelle Lucarelli, Raul Isern, Danielle Valoras, Cindy Tregoe, Jennifer Damron, Marlena Rucker, Julie Nelson, Yvonne Thomas, Debbie McGregor, Linda Brown and Tone Gaglione, individually and on behalf of others similarly situated (collectively "Plaintiffs").

CASE NO. 07-21221-CIV-ALTONAGA/BROWN
Non-Natura Defendants' Response to Plaintiffs' Motion to Add
and/or Substitute Arna Cortazzo as a Plaintiff/Class Representative

Food Products Liability Litigation, Case No. 1:2007CV02867, MDL No. 1850 ("Pet Food Recall Litigation").

The Non-Natura Defendants take no position on Plaintiffs' Motion to Add/Substitute Arna Cortazzo or Natura's Interim Opposition to Plaintiffs' Motion to Amend and/or Substitute Arna Cortazzo as a Plaintiff/Class Representative [Doc. 458] in light of Plaintiffs' unequivocal statement that "only claims against Natura will be prosecuted going forward" [Plaintiffs' Motion Add/Substitute Arna Cortazzo, p. 2].³

The Non-Natura Defendants submit this response to correct misstatements by Plaintiffs. As the Non-Natura Defendants have consistently informed Plaintiffs and the Court, Plaintiffs' interpretation of the scope of the release in the Settlement Agreement in the Pet Food Recall Litigation is inaccurate. *See* Transcript of July 31, 2008 Telephonic Hearing, pp. 8-9, 14-15 [Doc. 450]. The proposed settlement in the Pet Foods Recall Litigation is with various companies and persons or entities that handled, distributed, purchased for resale and/or redistribution, supplied, manufactured and/or sold or offered for sale pet food and/or treats that may have contained contaminated wheat gluten or rice protein concentrate ("Recalled Pet Food Products"). The release in the Settlement Agreement of the Pet Food Recall Litigation deals only with those Recalled Pet Food Products and Plaintiffs' claims in this case include products other than Recalled Pet Food Products. As a result, the Non-Natura Defendants disagree with

³ Plaintiffs' counsel no longer represents Lisa MacDonald [Order on Plaintiffs' Motion to Withdraw [Doc. 455]] or Debbie Rice [Order on Plaintiffs' Motion to Withdraw [Doc. 460]]. While Plaintiffs' counsel have stated explicitly their intentions related to the future prosecution of this litigation, Plaintiffs' counsel presumably do not speak for either Ms. MacDonald or Ms. Rice.

Plaintiffs' assertion that "all claims in this case will likely be void based upon the [Pet Food Recall Litigation]." Plaintiffs' Motion Add/Substitute Arna Cortazzo, p. 1.⁴

Respectfully submitted,

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⁴ Plaintiffs also assert that they "are in the process of attempting to negotiate a *settlement* for the dismissal of all the Defendants except Natura." Plaintiffs' Motion to Add/Substitute Arna Cortazzo, p. 1 (emphasis added). To be clear, Plaintiffs are discussing with the Non-Natura Defendants only the terms of dismissal.

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I certify that on the 29th day of August 2008, I electronically filed the foregoing with the Clerk of Courts using the CM/ECF system, which will send notification of such filing to CM/ECF participants:

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