

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.

**DECLARATION OF KRISTEN E. CAVERLY IN SUPPORT OF NATURA'S
OPPOSITION TO PLAINTIFFS' MOTION FOR LEAVE TO
SUPPLEMENT MOTION TO ADD AND/OR SUBSTITUTE
ARNA CORTAZZO AS A PLAINTIFF/CLASS REPRESENTATIVE**

1. I, Kristen E. Caverly, am over the age of 18 and have personal knowledge of the facts set forth herein or know of such facts from my review of the case files for this action, which are maintained by my office in the normal course of business. I am lead counsel for defendant Natura Pet Products, Inc., and am admitted *pro hac vice* in the action.
2. On or about June 30, 2008, Plaintiffs' counsel served me with plaintiff Patricia Davis' Responses to Mars Incorporated's First Set of Interrogatories. A true and correct copy of relevant excerpts of that document is attached as Exhibit "A" (no Natura products identified).
3. On September 12, 2008, Plaintiffs' attorney, Catherine MacIvor, emailed me indicating that Plaintiffs' counsel were in possession of a document dated January 16, 2008, that indicates that Patricia Davis has used Natura Innova. A true and correct copy of the email is attached as Exhibit "B".

The foregoing is stated under penalty of perjury under the laws of the United States of America. Executed in Rancho Santa Fe, California, on September 15, 2008.



Kristen E. Caverly