

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.

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**DECLARATION OF RUSSELL KEITH**

I, Russell Keith, declare and state the following is true and correct under penalty of perjury:

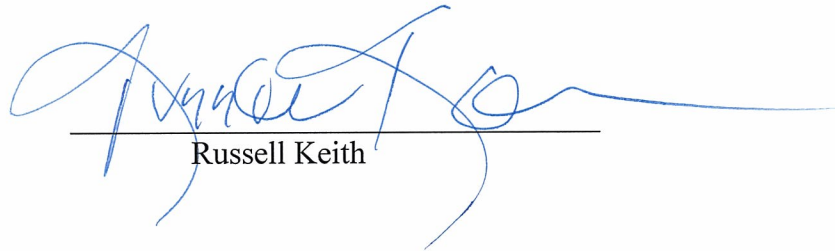
1. My name is Russell Keith and I am over the age of eighteen and I have personal knowledge of all of the facts contained herein.
2. I am a paralegal at the law firm of Maltzman Foreman, P.A
3. I have reviewed the Defendant Natura Pet Products, Inc.'s ("Natura") subpoena for documents directed to Maltzman Foreman P.A. attached hereto as Exhibit "A."
4. As for the fourth request in the *duces tecum*, it would literally take me months to determine whether there are any responsive documents. First, I would have to search from March 2007 to the present on every computer in the law firm to determine whether anyone had any responsive documents. I estimate that it would take me at least three weeks (40 hours per week x three weeks = 120 hours per computer) to review documents on each computer in the law

firm (48 computers total) to determine whether any responsive documents exist. That would total 5,760 and at \$125.00 an hour for the review would come to a total cost of \$720,000.

6. If I were to search a very extensive case file for “all” documents, I estimate that would take at least two weeks (40 hours per week = 80 hours) to determine whether there are any responsive documents. 80 hours at \$125.00 per hour would come to a total of \$10,000, which is a conservative estimate.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 6, 2007.



Russell Keith