

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

CASE NO. 07-21221 CIV ALTONAGA/Turnoff

RENEE BLASZKOWSKI, et al.,

Plaintiffs/Class Representatives,

vs.

MARS INC., et al.

Defendants.

DECLARATION OF ARNA CORTAZZO

I, Arna Cortazzo, declare and state the following is true and correct under penalty of perjury:

1. My name is Arna Cortazzo. I am over the age of eighteen and I have personal knowledge of all of the facts contained herein.

2. I have reviewed Natura's Response to the Plaintiffs' Renewed Motion and/or Motion for Reconsideration of Plaintiffs' Motion to Add and/or Substitute Arna Cortazzo as a Plaintiff/Class Representative and the Declaration of Kristen Caverly. The information contained in the Response is not accurate.

3. My knowledge of the alleged quality of Natura's products did not result from just viewing Natura's website. Rather, upon initially entering Pet Pros Pet Store in Rockledge, Florida, I talked with the proprietor regarding the quality of pet food in general. I explained that I was concerned with the quality of pet food and planned on making my own meals for my pets. The proprietor told me that I should not do that and to instead try Natura's products because they were of the same quality as meals I would prepare myself.

5. After my conversation with the proprietor, I performed Internet research and reviewed Natura's website to obtain additional information regarding the quality of Natura's pet food. At no time did Natura's website explicitly say that Natura's pet food was "fit for human consumption," but the overall message was clear that the food was of human quality.

6. While reviewing the website, I had no knowledge or notice that the website had a Legal Terms and Conditions section that included a venue selection clause. During the entire time I reviewed Natura's website, I was never prompted to read any terms or conditions or accept any terms or conditions as part of my ability to view the website. I never read any legal terms or conditions while reviewing Natura's website and none were ever stated on the web pages that I viewed.

7. Based upon my conversation with the proprietor at Pet Pros Pet Store and my review of Natura's website, I later returned to Pet Pros Pet Store and purchased Natura Evo dog and cat food. I purchased these products during the class period, between May 9, 2003 and May 9, 2007.

8. I have never purchased any Natura products over the Internet, including from Natura's website.

9. The Response is also inaccurate as to my perceived involvement in this case as well as in the case that was filed on my behalf. Pursuant to my conversations in August and September 2007, I knew that the law firm of Maltzman Foreman would be filing pleadings on my behalf in the Southern District of Florida. At that time, we discussed that I wanted to be involved in the class action, that I wanted to assert my claims against Natura, and that I wanted to serve as a class representative. As my counsel are skilled attorneys, I left it to their judgment to determine the best procedural vehicle by which to make that happen.

CASE NO. 07-21221 CIV ALTONAGA/Turnoff

11. Although attorneys at Maltzman Foreman and I discussed what pleadings Maltzman Foreman would file on my behalf, at the time of my deposition, I could not recall whether I became a named plaintiff/class representative in this case or whether a new case asserting the exact same causes of action was filed.

12. Unfortunately, despite my best efforts to do so, I cannot remember every detail of my discussions with Maltzman Foreman, but that does not mean that I do not participate in these discussions or will not pursue my claims—and the claims of the class—with vigor. To the contrary, I have been very involved in everything that has happened regarding my status in this case, and Maltzman Foreman has not done anything without my express consent or approval.

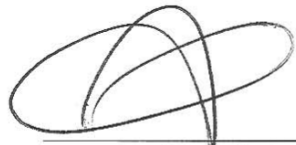
13. Further, I have discussed with Maltzman Foreman what I am seeking from their representation and have provided instruction as to how I want to obtain relief for my claims. Yet, of course I have left the actual management of the case to my counsel as I believe they, not me (the prospective plaintiff/class representative), is more suitable for planning the direction of this case. Certainly, while I may be an attorney, I am not the attorney in this case.

14. Additionally, I did not prepare responses to the Defendants' interrogatories and document requests because I thought I was a named Plaintiff/Class Representative in this case. Rather, I prepared responses to the interrogatories and document requests because I was seeking to become a Plaintiff/Class Representative in this case and because I knew that, if I was allowed to do so, I would be required to respond to the interrogatories submitted by the Defendants. Therefore, as a convenience to the Defendants, including Natura, I went through the laborious process of preparing responses to the Defendants' proffered interrogatories even prior to being added as a Plaintiff/Class Representative so that the Defendants would have my discovery responses as early as possible.

CASE NO. 07-21221 CIV ALTONAGA/Turnoff

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

Executed on January 16, 2009.



Arna Cortazzo

CASE NO. 07-21221 CIV ALTONAGA/Turnoff