

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 PATRICIA DAVIS FILED IN SUPPORT OF PLAINTIFFS
MOTION FOR A PROTECTIVE ORDER**

1. I am an adult over the age of eighteen and currently reside in Micanopy, Florida. I am a plaintiff in the above captioned matter and if called upon to do so I could and would competently testify to the following under oath in a court of law.

2. I am aware that the defendant in this matter has served a Request to Produce Documents upon me which requests that I produce, among other things, the computer I used to prepare responses to interrogatories previously propounded to me by defendant Mars, Inc.

3. I have only one computer that I used in responding to those interrogatories and the only information on that computer I have relating to those interrogatory responses would be email communications between me and my attorneys and the saved interrogatories.

4. I use my computer for many personal and private things, including personal communications with family, friends and business associates, the storing of all kinds of personal records including personal financial records, tax information, photos,

my husband's business records and communications, my website design records -- including the source files and computer applications used to build and maintain the websites), letters and many other things too numerous to list here. I also conduct a great deal of personal transactions and some business on it and explore various websites of interest. As I believe is the case with many other people, I keep all of my personal and private ~~and~~ documentation concerning every aspect of my and my family's lives ~~are~~ on that computer.

5. Further, other members of my family, who are not parties to this lawsuit, also use the computer for the same types of personal, business, and private purposes, and I do not want to see their privacy compromised for something in which they are not involved.

6. While I am not certain what the Defendant is looking for, I understand that the communications between me and my attorneys are confidential and privileged, and I will not waive that privilege as it relates to these communications. Further, I object to allowing the defendant to go through all of my personal records, communications and other information on my computer, not even knowing what they are looking for or ~~the~~ their purpose. To my knowledge they have not asked me to produce any specific information from my computer.

7. This would be the case even if the defendants were required by an Order of the Court not to disclose any of my personal and confidential information to others.

I declare under the penalty of perjury under the laws of the State of Florida that the forgoing is true and correct. Executed this 31st day of January 2009, in Micanopy, Florida.



Patricia Davis