

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

Case No. 99-2082 Civ.-Jordan/Mag. Bandestra

MONSANTO COMPANY AND
THE NUTRASWEET COMPANY,

Plaintiffs,

-against-

FAUSTO J. CAMPUZANO, MARIA
CAMPUZANO, F. GARCIA WHOLESALE
& EXPORT, INC., MARK SIEGEL,
KATHLEEN M. SIEGEL, TRIO
INTERNATIONAL TRADING, INC.
SARI EXPRESS, INC.,
COUNTYWIDE OF MIAMI, INC.
JOSE I. ARGUELLES, SYLVIA B.
ARGUELLES, TRAPEZA OVERSEAS, INC.
INTRANSIT SERVICES, INC., CARLOS
CASANOVA D/B/A CASANOVA TRUCKING,
SUN CONTAINER, INC., ALVARO
BUENDIA, AND JOHN DOES X, Y & Z,
BEING ANY OTHER PERSONS OR
ENTITIES PARTICIPATING IN THE
MANUFACTURE AND/OR DISTRIBUTION
OF THE COUNTERFEIT PRODUCT
AT ISSUE,

Defendants.

**AFFIDAVIT OF RODNEY A. BROWN IN FURTHER SUPPORT OF
PLAINTIFFS' MOTION TO COMPEL COMPLETE ANSWERS TO
INTERROGATORIES FROM DEFENDANTS MARK SIEGEL, KATHLEEN M.
SIEGEL AND TRIO INTERNATIONAL TRADING, INC. AND FOR SANCTIONS**



connection with the transactions in dispute at bar.² Mr. Siegel's testimony also revealed that he spoke with numerous persons concerning Trio's purchase and/or sale of the Equal product. Parenthetically, it should be noted that Plaintiffs have not yet concluded Mr. Siegel's deposition. To the extent that Mr. Siegel refuses to appear for the continuation of his deposition, Plaintiffs, unfortunately, will be forced to seek an order granting a continuance of same.

5. The attorneys' fees incurred by Plaintiffs in connection with the preparation of the instant Reply are no less than \$900.00. The costs incurred, for postage and photocopying, are approximately \$20.00³.

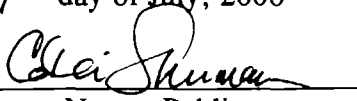
²Given the fact that Mr. Siegel's deposition was held on July 13, 2000, at the time of the service of the instant Reply, Plaintiffs do not have a copy of the transcript. However, Plaintiffs will provide same to the Court at the Court's request.

³At this time, a copy of the bill for the month of July, which includes the time expended in connection with the instant Reply, has not yet been prepared, but we have tallied herein the fees and costs incurred in connection with the preparation of this Reply.

6. For the reasons set forth herein, Plaintiffs' motion should be granted in its entirety.


RODNEY A. BROWN

Sworn to before me this
17th day of July, 2000


Notary Public

CORI SHERMAN
Notary Public, State of New York
No. 02SH5052671
Qualified in Nassau County
Certificate Filed in Nassau County
Commission Expires November 27, ~~1999~~
2001