UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY CAMDEN VICINAGE

CENTER FOR SCIENCE IN THE PUBLIC)		
INTEREST and Linda Franulovic, individually)		
and on behalf of a class of persons,)		
Plaintiffs,)		
v.)	Civil Action No.: 1:07-cv-0053	39-
)	RMB-JS	
THE COCA-COLA COMPANY,)		
Defendant.)		

CERTIFICATION IN SUPPORT OF DISCOVERY CONFIDENTIALITY ORDER

I the undersigned, am an attorney authorized to practice law in the United States

District Court for the District of New Jersey. I am a partner in the law firm of McCarter

& English, LLP, attorneys of record for The Coca-Cola Company. I have personal

knowledge of the statements made herein, and, if called as a witness, could and would

testify competently as to my knowledge. I submit this certification in support of the

Discovery Confidentiality Order in the above-listed litigation.

1. Nature and materials to be kept confidential: This Litigation involves allegations of false or misleading claims with respect to the sale of beverage produced and marketed by defendants. As such, the Litigation is likely to involve the production of materials regarding trade secret or other confidential research, development, or commercial information, such as information relating to the formulation, scientific testing, and non-public marketing strategy of the beverage at issue, that qualify for protection pursuant to Fed. R. Civ. P. 26(c).

2. Legitimate private or public interests which warrant confidentiality:

Defendants have a legitimate business interest in avoiding undue burden or expense associated with the Litigation which warrants maintaining the confidentiality of the above-listed information pursuant to Fed. R. Civ. P. 26(c).

3. Clearly defined and serious injury would result should the order not be

entered: Disclosure of the above-listed information to another Party or non-Party would create a substantial risk of serious injury such as decreased market share, exposure of trade secrets, and loss of good will, to that Party or its customers.

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

Dated: August 10, 2007

Gita F. Rothschild