

**THE  
FERRARA  
LAW FIRM****LAWYERS HELPING PEOPLE  
SINCE 1972****Michael A. Ferrara, Jr., Esquire+  
Niki A. Trunk, Esquire****+Certified by The Supreme Court Of  
New Jersey as a Certified Civil Trial  
Attorney****+Board Certified in Civil Trial Law By  
The National Board of Trial Advocacy****All Attorneys Are Admitted to Practice  
in New Jersey and Pennsylvania.****601 Longwood Avenue  
Route 38 & Longwood Avenue  
Cherry Hill NJ 08002****Phone: 856.779.9500  
Toll Free 877.NJLEGAL  
Fax: 856.661.0369****Website: [www.ferraralawfirm.com](http://www.ferraralawfirm.com)****[mferrara@ferraralawfirm.com](mailto:mferrara@ferraralawfirm.com)  
[ntrunk@ferraralawfirm.com](mailto:ntrunk@ferraralawfirm.com)****RECEIVED****MAY 22 2007****NOEL L. HILLMAN  
U.S. DISTRICT JUDGE**

May 22, 2007

**VIA HAND DELIVERY**

The Honorable Noel L. Hillman  
United States District Court  
District of New Jersey  
Mitchell H. Cohen U.S. Courthouse  
1 John F. Gerry Plaza, Room 6020  
Camden, NJ 08101

**Re:       Workman, et al. v. Menu Foods, et al.  
          Case No.: 07-cv-1338**

Dear Judge Hillman:

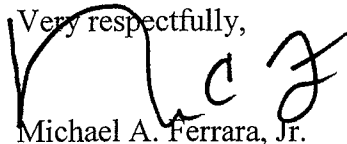
My firm serves as local counsel with a number of firms that have filed class action cases throughout the United States, including this District. We wish to address to the Court our concerns with the current proposed "solicitation" letter submitted by a limited number of Plaintiffs' counsel.

Without notifying my firm (and dozens of other firms with pending class cases in this and other Districts), a limited number of Plaintiffs' counsel unilaterally filed the current motion before your Honor. While we have no objection to certain aspects of the motion, from our viewpoint, the proposed letter submitted by a limited number of self-selected counsel (who have yet to obtain any court-approved leadership role) may create more problems than it solves.

For example, a number of the firms listed as signatories to the letter apparently have been included in this self-appointed leadership structure for "political" reasons undisclosed to this Court. To allow a self-selected group of firms to be the 'only' plaintiffs' firms listed as signatories to such an important letter is totally inappropriate.

The Honorable Noel L. Hillman  
May 22, 2007  
Page 2

As such, on behalf of my firm's clients (as well as the dozens of other firms intentionally excluded from this process), we object to the distribution of the proposed letter to class members without full and fair representation by all counsel with pending MDL cases.

Very respectfully,  
  
Michael A. Ferrara, Jr.

cc: William M. Audet, Esquire  
Scott A. Kamber, Esquire  
Lisa J. Rodriguez, Esquire  
Jason Holfield, Esquire  
Frank Jablonski, Esquire  
Jeremy Hutchinson, Esquire  
Thomas M. Ferlauto, Esquire  
John Blim, Esquire  
Larry Drury, Esquire  
Gerald H. Hanson, Esquire