Gerard H. Hanson, Esquire Hill Wallack LLP Attorneys at Law CN 5226 202 Carnegie Center Princeton, NJ 08543-5226 (609) 924-0808 Attorneys for Defendants Menu Foods Limited Menu Foods, Inc., and Menu Foods Midwest Corporation

## UNITED STATES DISTRICT COURT

## DISTRICT OF NEW JERSEY

OLIVIA GUERCIONI, individually and on behalf of all others similarly situated,

Plaintiff,

v.

MENU FOODS LIMITED, d.b.a. MENU FOODS, MENU FOODS, INC., MENU FOODS MIDWEST CORPORATION, and JOHN DOES 1-10, ABC Corps 1-15 (Fictitious Names)

Defendants

Civil Action No.: 07-cv-2202-NLH-AMD

CERTIFICATION OF COUNSEL

Gerard H. Hanson, of full age, hereby certifies:

- I am an attorney at law of the State of New Jersey, a partner with the New Jersey 1. law firm of Hill Wallack LLP, and have been retained as Local New Jersey Counsel to represent the interests of the moving party defendants.
- Edward Ruff, Esquire and Michael Turiello, Esquire of the Chicago, Illinois firm 2. of Pretzel & Stouffer, are serving as National Lead Counsel for the moving party defendants with respect to the "In re Pet Food Product Liability Litigation" pending before the Judicial Panel on

Multidistrict Litigation (MDL). The moving party has filed a Motion seeking the pro hac vice admission of Messrs. Ruff and Turiello, which is returnable on June 1, 2007.

- 3. This Certification is submitted in support of the Motion to Stay this lawsuit pending the ruling by the Judicial Panel on Multidistrict Litigation with respect to multiple pending Motions to Transfer and Consolidate numerous Class Action Complaints, which applications are presently scheduled for Hearing before the MDL Panel on May 31, 2007 at the Federal Courthouse in Las Vegas, Nevada.
- 4. This Motion to Stay is consistent with the Order of Judge Noel L. Hillman dated May 2, 2007 staying 29 putative Class Action Complaints pending in the District of New Jersey, which were filed by various plaintiffs against Menu Foods, Inc. and other entities affiliated with Menu Foods, Inc. arising out of the allegation that Menu Foods, Inc. manufactured and sold defective pet food which caused illness and/or death to the cats and dogs of the plaintiffs. Similar to the previously stayed actions, this Complaint, which was removed from the Superior Court of New Jersey, alleges that the plaintiffs suffered damages as a result of their pets consuming food manufactured by the defendants. Pending the outcome of the Motions to Transfer and Consolidate which are pending before the Judicial Panel on Multidistrict Litigation, and consistent with Judge Hillman's prior Order, the moving parties request that this lawsuit also be stayed in accordance with Judge Hillman's May 2, 2007 Order.

Respectfully submitted,

GERARD H HANSON

**EXHIBIT A** 

## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

JARED WORKMAN, et al.,	Civil Action No. 07-1338 (NLH)
Plaintiffs,	ORDER
v.	ORDER
MENU FOODS LIMITED, et al.,	
Defendants.	
SUZANNE THOMSON, et al.,	Civil Action No. 07-1360 (NLH)
Plaintiffs,	·
v.	·
MENU FOODS LIMITED, et al.,	
Defendants.	
LARRY WILSON, et al.,	Civil Action No. 07-1456 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	
PAUL RICHARD, et al.,	Civil Action No. 07-1457 (NLH)
Plaintiffs,	
v.	•
MENU FOODS LIMITED, et al.,	
Defendants.	

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LINDA TINKER, et al.,	Civil Action No. 07-1468 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	
JANICE BONIER, et al.,	Civil Action No. 07-1477 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	
JULIE HIDALGO, et al.,	Civil Action No. 07-1488 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
D. C. Alanda	
Defendants.	
ALEXANDER NUNEZ, et al.,	Civil Action No. 07-1490 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	
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MARK GOLDING, et al.,	Civil Action No. 07-1521 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	
TROY GAGLIARDI, et al.,	Civil Action No. 07-1522 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	• • .
Defendants.	
KAMI TURTURRO, et al.,	Civil Action No. 07-1523 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	
PEGGY SCHNEIDER, et al.,	Civil Action No. 07-1533 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	

LESLIE BERNDL, et al.,	Civil Action No. 07-1553 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	
JAYME PITTSONBERGER, et al.,	Civil Action No. 07-1561 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	
DAVID CARTER, et al.,	Civil Action No. 07-1562 (NLH)
Plaintiffs,	
v	
MENU FOODS LIMITED, et al.,	
Defendants.	
JIM BULLOCK, et al.,	Civil Action No. 07-1579 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	

Civil	Action	No.	07-1610	(NLH)
	,			
Civil	Action	No.	07-1623	(NLH)
Civil	Action	No.	07-1624	(NLH)
Civil	Action	No.	07-1638	(NLH)
	Civil	Civil Action	Civil Action No.	Civil Action No. 07-1623  Civil Action No. 07-1624  Civil Action No. 07-1638

STEVEN FREEMAN, et al.,	Civil Action No. 07-1646 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	•
KAREN PIRCHES, et al.,	Civil Action No. 07-1685 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	
DIANA DIEDRICH, et al.,	Civil Action No. 07-1700 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	
TODD SOKOLWSKI, et al.,	Civil Action No. 07-1709 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	

MICHELE MCCULLOUGH, et al.,	Civil Action No. 07-1710 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	
STEVE COLQUITT, et al.,	Civil Action No. 07-1738(NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	
LUKE DEBARATHY, et al.,	Civil Action No. 07-1739 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	
LOREN BYERS, et al.,	Civil Action No. 07-1747 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	

LYNNE CARESTIO, et al.,	Civil Action No. 07-1762 (NLH)
Plaintiffs,	
v.	
MENU FOODS LIMITED, et al.,	
Defendants.	
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This matter having come before the Court on Defendants' motions to stay, as well as the Court's inherent power to stay proceedings through the exercise of its sound discretion, see Landis v. North American Co., 299 U.S. 248, 254-55 (1936); and

It appearing that some of the parties in the above-captioned actions have filed motions with the Joint Panel on Multidistrict Litigation to transfer and consolidate these actions;

IT IS HEREBY ORDERED on this 2nd day of May, 2007, that the above-captioned actions are stayed until the Joint Panel on Multidistrict Litigation issues a decision on the transfer and consolidation motions currently pending before it in MDL-1850, In re Pet Food Product Liability Litigation.

s/ Noel L. Hillman

At Camden, New Jersey NOEL L. HILLMAN, U.S.D.J.