

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

In re:	:	Document Electronically Filed
	:	MDL Docket No. 1850
PET FOOD PRODUCTS	:	Civil Action No. 07-2867 (NLH)
LIABILITY LITIGATION	:	ALL CASES
	:	
	:	

**BRIEF IN SUPPORT OF DEFENDANTS'
JOINT MOTION TO APPOINT LIAISON COUNSEL**

Pursuant to the Court's Orders of August 14, 2007 (D.E. No. 10) and August 29, 2007 (unnumbered D.E.), and for the reasons articulated below, all of the undersigned Defendants in this action jointly move the Court for an Order appointing the following counsel as Defendants' Liaison Counsel: Amy W. Schulman, DLA Piper US LLP (counsel for the Menu Foods defendants); Craig A. Hoover, Hogan & Hartson LLP (counsel for Nestle Purina PetCare Company); Mark C. Goodman, Squire Sanders & Dempsey LLP (counsel for PETCO Animal Supplies, Inc., Wal-Mart Stores, Inc., PetSmart, Inc., and Target Corporation); and D. Jeffrey Ireland, Faruki Ireland & Cox, P.L.L. (counsel for The Procter & Gamble Company and The Iams Company).

The undersigned Defendants concur that appointment of these counsel as the Liaison Counsel for the Defendants is appropriate and necessary because it will substantially reduce the number of counsel involved in the administrative and scheduling tasks to be coordinated and managed in this complex action and at the same time provide liaison representation to sub-groups within the overall defense group whose respective interests are similarly aligned. Ms.

Schulman represents defendant Menu Foods, a non-brand specific manufacturer of wet pet food. Mr. Hoover and Mr. Ireland represent brand manufacturer defendants. Mr. Goodman represents retailer defendants.

For these reasons, the undersigned Defendants respectfully request that the Court enter an Order appointing Amy W. Schulman, Craig A. Hoover, D. Jeffrey Ireland, and Mark C. Goodman as Defendants' Liaison Counsel in this action.

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Dated: September 5, 2007