

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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IN RE PET FOODS PRODUCTS	)	MDL Docket No. 1850 (All Cases)
LIABILITY LITIGATION	)	Master Docket: 07 CV 2867 (NLH)(AMD)
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**[PROPOSED] ORDER FOR APPOINTMENT OF  
PLAINTIFFS' CO-LEAD COUNSEL**

IT IS HEREBY ORDERED for all actions in MDL No. 1850:

**I. LEADERSHIP ORGANIZATION OF PLAINTIFFS' COUNSEL**

A. The organizational structure regarding co-lead plaintiffs' counsel established by this Order shall be applicable to MDL No. 1850;

B. The following attorneys shall serve as co-lead plaintiffs' counsel (hereinafter "Co-Lead Counsel"): William M. Audet, Esq., Scott A. Kamber, Esq., and Jay Edelson, Esq.;

C. Consistent with the *Manual of Complex Litigation* (4<sup>th</sup>), as Co-Lead Counsel, William M. Audet, Esq., Scott A. Kamber, Esq., and Jay Edelson, Esq. shall have the following responsibilities and duties:

1. To brief and argue motions, either personally or through counsel whom they designate;
2. To decide strategy;

3. To receive monthly time reports from plaintiffs' counsel, set assessments, and allocate fees;
4. To initiate, conduct, and respond to discovery and discovery motions;
5. To act as the spokesperson at conferences; and
6. To negotiate with defense counsel with respect to settlement and discovery-related issues.

D. Co-Lead Counsel shall make all work assignments in such a manner as to conduct this litigation in an orderly and efficient manner and to avoid unnecessary duplication by plaintiffs counsel.

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Noel L. Hillman, USDJ