

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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

MENU FOODS' RESPONSE TO
MOTIONS FOR LEAD PLAINTIFFS' COUNSEL

The Menu Foods Defendants ("Menu Foods") submit this response to the four motions for appointment of lead plaintiffs' counsel filed on September 4 and 5, 2007. The motions filed include the following: the Motion to Appoint McLaughlin & Stern LLP and Abbey Spanier Rodd & Abrams, LLP as Interim Counsel for the Class; two separate Motions to Appoint Berger & Montague, P.C., Wexler, Toriseva, Wallace LLP, Coughlin Stoia Geller Rudman & Robins LLP, and Hagens Berman Sobol Shapiro LLP as Liaison Counsel; and the Motion to Appoint William Audet, Scott Kamber and Jay Edelson as Co-Lead Counsel (collectively, the "motions").

While Menu Foods takes no position on the motions and will work with the counsel this Court appoints, Menu Foods is compelled to file this response because of a number of allegations directed at Menu Foods that were made in certain motions. Because these allegations are not relevant to the motions, Menu Foods will not respond to the substance of the allegations at this time. Menu Foods wants to make clear, however, that it strongly disputes the allegations made against it and does not waive its right to respond to the substance of them at the appropriate time.

Respectfully submitted,

By: /s/ Gerard H. Hanson
Gerard H. Hanson, Esq.
Hill Wallack LLP
202 Carnegie Center, CN 5226
Princeton, NJ 08543-5226
Telephone: (609) 924-0808
Facsimile: (609) 452-1888
E-mail: ghh@hillwallack.com

By: /s/ Amy W. Schulman
Amy W. Schulman, Esq.
DLA Piper US LLP
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 335-4500
Facsimile: (212) 335-4501
E-mail: amy.schulman@dlapiper.com

By: /s/ Matthew Lepore
Matthew Lepore, Esq.
DLA Piper US LLP
1200 19th Street, N.W.
Washington, DC 20036
Telephone: (202) 861-3891
Facsimile: (202) 223-2085
E-mail: matthew.lepore@dlapiper.com

Counsel for Menu Foods Defendants