

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: PET FOOD PRODUCTS
LIABILITY LITIGATION

Civil Action No. 07-2867 (NLH)

MDL DOCKET NO. 1850

THIS DOCUMENT RELATES TO:

ALL CASES

**SUPPLEMENTAL DECLARATION OF
KENNETH A. WEXLER REGARDING
MAJORITY PLAINTIFFS' MOTION
FOR APPOINTMENT OF INTERIM
CO-LEAD AND LIAISON COUNSEL
PURSUANT TO FED. R. CIV. P. 23(G)**

Date: September 26, 2007

Time: 11:00 a.m.

Courtroom: 3A

The Honorable Noel L. Hillman

I, Kenneth A. Wexler, declare as follows:

1. I submit this declaration as a supplement to the one I filed on September 5, 2007 in support of the Majority Plaintiffs' Motion For Appointment of Interim Co-Lead And Liaison Counsel Pursuant to Federal Rule of Civil Procedure 23(g). I have personal knowledge of the matters set forth herein, and if called upon to testify, would be competent to do so.

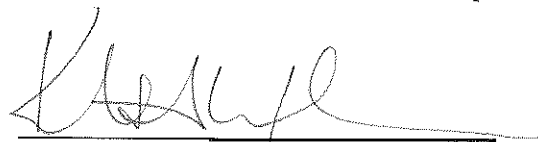
2. In their papers filed on September 5, 2007 and September 12, 2007, Messrs. Kamber, Edelson and Audet ("The Kamber Group") accuse Proposed Co-Lead Counsel of widespread deal-making with other attorneys or firms to obtain the existing majority support for our proposed leadership structure.

3. We have made no promises, guarantees, or assurances to any attorneys in this case, beyond the assurance of opportunity for meaningful work for those qualified firms that intend to contribute to this case. We have made no promises of financial protection, no fee deals, no guarantees of assignments, no meaningless “make work,” and certainly no unseemly side arrangements.

4. The greatest extent to which a “committee” exists in this case is in the form of a working group of attorneys on settlement issues. Messrs. Kamber, Audet and Edelson can certainly be said to work within this group. In fact, soon after Menu Foods expressed its desire to resolve the litigation in open Court on June 27, 2007, I reached out to Mr. Audet and asked him to join us by way of a settlement committee so we could set aside our differences in the hope of achieving relief for the Class.

5. We have also included Mr. Larry Drury, who is affiliated with The Progressive Law Group and the Wolf Haldenstein firm, who together represent over 500 clients in this litigation. Well before the Majority Plaintiffs became organized to form the currently proposed leadership structure, Mr. Drury was involved in discussions with Menu Foods’ counsel, and he participated in an early meeting with Menu Foods’ attorneys. Menu Foods made clear early on its intention to explore resolution of these cases. After this meeting, Mr. Drury expressed his desire to have a voice in settlement, and in the interest of presenting a united front to the defendants, we told him that we wanted his participation specifically with regard to settlement.

6. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed on September 18, 2007 in Chicago, Illinois.


Kenneth A. Wexler