

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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IN RE “A MILLION LITTLE PIECES”  
LITIGATION

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No. 06-md-1771

Hon. Richard J. Holwell

**AMLPL PLAINTIFFS’ GROUP’S SECOND SUPPLEMENTAL  
MEMORANDUM REGARDING ADDITIONAL NOTICE**

On Friday, April 26, 2007, subsequent to AMLP Plaintiffs’ Group’s filing of its Supplemental Memorandum Regarding Additional Notice (Document 60), AMLP Plaintiff’s Group received an e-mail from September Wynn, Risk Manager & Associate General Counsel of Borders Group, Inc (“Borders”). *See* Second Declaration of Evan J. Smith, Esquire in support of the AMLP Plaintiffs’ Group’s Supplemental Memorandum Regarding Approval Of Notice Plan. In her e-mail, Ms. Wynne provides additional information to supplement Borders’ response to the AMLP Groups’ inquiry regarding the possibility of Borders providing supplemental notice of the class-wide settlement in this action. So that the record contains the complete set of correspondence, the AMLP Group has attached Ms. Wynne’s April 26, 2007 e-mail to the Smith Declaration as Exhibit “A”. For the Court’s convenience, the AMLP Plaintiffs’ Group’s original correspondence to Borders and Borders first response are attached to the Smith Declaration as Exhibit “B”.

Dated: April 30, 2007

Respectfully submitted,

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MDL Docket No. 1771

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THIS DOCUMENT RELATES TO  
ALL ACTIONS

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**PROOF OF MAILING**

I, Evan J. Smith, Esquire, am over the age of eighteen and on this 30<sup>th</sup> day of April, 2007, certify that I have filed the attached Second Supplemental Memorandum of Law and supporting papers via ECF system pursuant to the SDNY local rules.

Dated: April 30, 2007

/s/ Evan J. Smith, Esquire (ES3254)  
Evan J. Smith, Esquire (ES3254)