

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JACKSON LEWIS LLP
ATTORNEYS FOR DEFENDANT MSLGROUP Americas, Inc.
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ATTORNEYS OF RECORD:
VICTORIA WOODIN CHAVEY, ESQ.
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MONIQUE DA SILVA MOORE,
MARYELLEN O'DONOHUE, LAURIE
MAYERS, HEATHER PIERCE, and
KATHERINE WILKINSON, on behalf of
themselves and all others similarly situated,

Plaintiffs,

Case No. 11-cv-1279 (ALC) (AJP)

vs.

PUBLICIS GROUPE SA and
MSLGROUP,

Defendants.

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**DECLARATION OF BRETT M. ANDERS
IN SUPPORT OF DEFENDANT MSLGROUP AMERICAS, INC.'S OPPOSITION TO
PLAINTIFFS' MOTION FOR RECUSAL OR DISQUALIFICATION**

I, Brett M. Anders, Esq., an attorney admitted to practice law, inter alia, before the United States District Court for the Southern District of New York, hereby affirm, under penalty of perjury, as follows:

1. I am a member of the law firm Jackson Lewis LLP, counsel for Defendant MSLGROUP Americas, Inc.

2. The following statements are true based upon my own knowledge, review of pertinent documents, and information and belief.

3. Attached as Exhibit 1 is a true and correct copy of the October 7, 2011 letter from Counsel for Defendant MSL to Plaintiffs' Counsel.

4. Attached as Exhibit 2 is a true and correct copy of the October 21, 2011 letter from Counsel for Defendant MSL to Plaintiffs' Counsel.

5. Attached as Exhibit 3 is a true and correct copy of the November 3, 2011 letter from Counsel for Defendant MSL to Plaintiffs' Counsel.

6. Attached as Exhibit 4 is a true and correct copy of the transcript of the December 2, 2011 conference before Judge Peck.

7. Attached as Exhibit 5 is a true and correct copy of the December 19, 2011 letter from Plaintiffs' Counsel to Judge Peck.

8. Attached as Exhibit 6 is a true and correct copy of the January 3, 2012 letter from Plaintiffs' Counsel to Judge Peck.

9. Attached as Exhibit 7 is a true and correct copy of the transcript of the January 4, 2012 conference before Judge Peck.

10. Attached as Exhibit 8 is a true and correct copy of the February 13, 2012 DOAR Press release.

11. Attached as Exhibit 9 is a true and correct copy of the October 1, 2011 article from Law Technology News by Andrew Peck entitled: *Search, Forward; Will manual document review and keyword searches be replaced by computer-assisted coding?*

12. Attached as Exhibit 10 is a true and correct copy of the April 26, 2012 Declaration of Ralph C. Losey, Esq.

