UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JACKSON LEWIS LLP ATTORNEYS FOR DEFENDANT MSLGROUP A 220 Headquarters Plaza East Tower, 7th Floor	mericas, Inc.
Morristown, NJ 07960 (973) 538-6890	
ATTORNEYS OF RECORD: VICTORIA WOODIN CHAVEY, ESQ. JEFFREY W. BRECHER, ESQ.	
MONIQUE DA SILVA MOORE,	X
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.	
***************************************	X

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, <u>inter alia</u>, 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 <u>Exhibit 1</u> is a true and correct copy of the October 7, 2011 letter from Counsel for Defendant MSL to Plaintiffs' Counsel.
- 4. Attached as <u>Exhibit 2</u> 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 <u>Exhibit 7</u> 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 <u>Exhibit 9</u> 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 <u>Exhibit 10</u> is a true and correct copy of the April 26, 2012 Declaration of Ralph C. Losey, Esq.

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1:	3.	Attached	as	Exhibit	11	is	a	true	and	correct	copy	of	the	April	20,	2012
letter from Plain	tiffs' (Counsel to	Jı	ıdge Car	ter.											

14. Attached as Exhibit 12 is a true and correct copy of the transcript of the April 25, 2012 conference before Judge Peck.

Affirmed on this 30th	day
of April 2012.	•

<u>/s/</u>	
BRETT M. ANDERS, ESQ.	

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2012, the foregoing document was filed with the Clerk of the Court and served in accordance with the Federal Rules of Civil Procedure, and/or the Southern District's Local Rules, and/or the Southern District's Rules on Electronic Service upon the following parties and participants:

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/s/ BRETT M. ANDERS

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