

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

CHAMBERS OF
CATHERINE C. BLAKE
UNITED STATES DISTRICT JUDGE

U.S. COURTHOUSE
101 WEST LOMBARD STREET
BALTIMORE, MARYLAND 21201
(410) 962-3220
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April 8, 2004

All Counsel

Re: In re Royal Ahold NV Securities and ERISA Litigation - MDL 03-1539

Dear Counsel:

This will confirm the schedule set during our conference call on April 7, 2004. Our monthly calls will continue on the first Wednesday of every month beginning at **4:30 p.m.** I will arrange for court reporter coverage. I understand counsel for the parties will order and pay for their own copies initially, and the transcript will be filed electronically within a reasonable time (no more than 30 days) after the call.

The defendants' responses to the consolidated amended complaints shall be filed on or before **May 14, 2004**; the plaintiffs' oppositions to any motions to dismiss shall be filed on or before **July 13, 2004**; and the defendants' replies shall be filed on or before **August 27, 2004**.¹ A hearing on all motions to dismiss has been scheduled for **September 23, 2004**, beginning at **10:00 a.m.**

It was agreed that the schedule outlined in the plaintiffs' letter of April 5, 2004 for the discovery anticipated to begin after the motions to dismiss are resolved is generally acceptable, except that class discovery should begin earlier than proposed. Counsel expect to be able to agree on a specific proposal at a later date. The case should be ready for trial early in 2006.

Plaintiffs' counsel will file a further motion for a partial lift of the discovery stay directed at third party document production. Third parties and defendants will have at least two weeks to note any objections.

It is my understanding that Mr. Entwistle and Mr. Kurtz anticipate entering a stipulation regarding document preservation within the next week to ten days. The progress toward resolving document preservation issues with other defendants will be discussed at next month's conference call

¹Later-served defendants have reserved the right to ask for an extension of this schedule if necessary.

on May 5, 2004.

Despite the informal nature of this letter, it is an Order of the Court and shall be docketed as such.

Thank you all for your cooperation in moving this litigation forward.

Sincerely yours,

/s/

Catherine C. Blake
United States District Judge