

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

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**IN RE GENETICALLY MODIFIED RICE  
LITIGATION**

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)  
) **4:06 MD 1811 CDP**  
)  
) **ALL CASES**  
)

**NOTICE OF VIDEOTAPED 30(b)(6) DEPOSITIONS**

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendant Bayer CropScience LP will take the depositions of the following deponents as listed below and continuing thereafter until completed. The depositions will be recorded by a certified shorthand court reporter and by videotape.

**THURSDAY, JANUARY 7, 2010**

<b>Time</b>	<b>30(b)(6) Deponent</b>	<b>Location</b>
9:00 a.m.	Mitchell W. Deville	MORROW, MORROW, RYAN & BASSETT 324 West Landry St. Opelousas, LA 70570 337-948-4483
1:00 p.m.	Miller Brothers Farm (Shelton Miller)	MORROW, MORROW, RYAN & BASSETT 324 West Landry St. Opelousas, LA 70570 337-948-4483

**FRIDAY, JANUARY 8, 2010**

<b>Time</b>	<b>30(b)(6) Deponent</b>	<b>Location</b>
9:00 a.m.	Jody David Fontenot and Amy Fontenot	MORROW, MORROW, RYAN & BASSETT 324 West Landry St. Opelousas, LA 70570 337-948-4483

**TUESDAY, JANUARY 12, 2010**

<b>Time</b>	<b>30(b)(6) Deponent</b>	<b>Location</b>
9:00 a.m.	Verona M. Courville	MORROW, MORROW, RYAN & BASSETT 324 West Landry St. Opelousas, LA 70570 337-948-4483
10:30 a.m.	Aswell Farms (Dr. Charles Fontenot)	MORROW, MORROW, RYAN & BASSETT 324 West Landry St. Opelousas, LA 70570 337-948-4483
1:00 p.m.	Mitchell Ray Soileau	MORROW, MORROW, RYAN & BASSETT 324 West Landry St. Opelousas, LA 70570 337-948-4483

**WEDNESDAY, JANUARY 13, 2010**

<b>Time</b>	<b>30(b)(6) Deponent</b>	<b>Location</b>
9:00 a.m.	Gloria B. Fontenot	MORROW, MORROW, RYAN & BASSETT 324 West Landry St. Opelousas, LA 70570 337-948-4483

<b>Time</b>	<b>30(b)(6) Deponent</b>	<b>Location</b>
1:00 p.m.	Darrel Wayne Attales and Chrysanna Attales	MORROW, MORROW, RYAN & BASSETT 324 West Landry St. Opelousas, LA 70570 337-948-4483

**THURSDAY, JANUARY 14, 2010**

<b>Time</b>	<b>30(b)(6) Deponent</b>	<b>Location</b>
9:00 a.m.	Troy Fruge	MORROW, MORROW, RYAN & BASSETT 324 West Landry St. Opelousas, LA 70570 337-948-4483
1:00 p.m.	Lonesome Dover Plantation L.L.C. (Troy Fruge)	MORROW, MORROW, RYAN & BASSETT 324 West Landry St. Opelousas, LA 70570 337-948-4483

Pursuant to Federal Rule of Civil Procedure 30(b)(6), for each deponent, you are requested to designate one or more officers, directors or managing agents, or other persons who consent to testify on the deponent's behalf, and to testify to the matters known to or reasonably available to the deponent for the topics covered by **Schedule A** to this Notice.

Pursuant to the Deposition Protocol set forth in the Agreed Order Setting Deposition Protocol entered December 3, 2007, please provide notice of intent to attend a deposition by contacting Anita Seggelink at [anita.seggelink@bartlit-beck.com](mailto:anita.seggelink@bartlit-beck.com) or (303) 592-3135, with the names and party affiliations of those who plan on attending the deposition at least seven (7) days before the deposition.

Dated this 21st day of December, 2009.

Respectfully submitted,

/s/John M. Hughes

John M. Hughes

William F. Goodman, III  
Joseph J. Stroble  
Elizabeth M. Gates  
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1899 Wynkoop Street, 8th Floor  
Denver, Colorado 80202

***ATTORNEYS FOR THE BAYER DEFENDANTS***

**CERTIFICATE OF SERVICE**

I certify that on this 21st day of December, 2009, I served a true and correct copy of the foregoing **NOTICE OF VIDEOTAPED 30(b)(6) DEPOSITIONS** on the following by regular United States mail:

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/s/John M. Hughes

John M. Hughes

**SCHEDULE A**

The matters on which examination is requested are:

1. All allegations set forth in any Complaint filed by Plaintiff and/or Master Complaint in this action.
2. The discovery requests served on Plaintiff and Plaintiff's responses in this action, including the Plaintiff Fact Sheet and steps taken to comply with relevant discovery requests and related orders in this action.
3. All damages alleged to relate to Liberty Link rice, including all actions taken to avoid or mitigate claimed damages.
4. The ownership, formation, and operation of the Plaintiff business entity and all property and business interests associated with the Plaintiff business entity.