

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

IN RE GENETICALLY MODIFIED RICE LITIGATION)))))	4:06 MD 1811 CDP
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ALL CASES

REVISED 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.

TUESDAY, DECEMBER 1, 2009

Time	30(b)(6) Deponent	Location
9:00 a.m.	Wiese Bros. Farm	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
9:00 a.m.	R&R Farming, J.V.; Reneau Gold Farming, J.V.; and Gold & Gold, Inc.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
1:00 p.m.	Walter E. Dutcher, Sr.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434

WEDNESDAY, DECEMBER 2, 2009

Time	30(b)(6) Deponent	Location
9:00 a.m.	Gertson Farms Partnership	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434

Time	30(b)(6) Deponent	Location
9:00 a.m.	Lapham & Lapham	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
1:00 p.m.	Thomas A. Smaistrla, J.V.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
1:00 p.m.	Guy Randall Manville & Carolyn Manville, J.V.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434

THURSDAY, DECEMBER 3, 2009

Time	30(b)(6) Deponent	Location
9:00 a.m.	Popp & Boenisch, J.V.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
1:00 p.m.	Fort Bend Farms, J.V.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434

FRIDAY, DECEMBER 4, 2009

Time	30(b)(6) Deponent	Location
9:00 a.m.	Terrance Hlavinka Cattle Co.; Hlavinka Cattle Co., J.V.; Tres Bayou Farms, L.P.; and T&K Hlavinka Farms	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
9:00 a.m.	Hobbs Spraying Services	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
1:00 p.m.	U-2 Farms and Wigginton Family, J.V.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
1:00 p.m.	George Williams Farms, Inc.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434

MONDAY, DECEMBER 7, 2009

Time	30(b)(6) Deponent	Location
9:00 a.m.	Engstrom Bros.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
9:00 a.m.	Pavlock Farms, Inc.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
1:00 p.m.	Guthman Farms, Inc. and Guthman Farms	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
1:00 p.m.	Westside Joint Venture and Stelzel Rice, Inc.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434

TUESDAY, DECEMBER 8, 2009

Time	30(b)(6) Deponent	Location
9:00 a.m.	English Farms, J.V.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
9:00 a.m.	S&S Farms, J.V. and D&H Stelzel, Inc.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
1:00 p.m.	Hlavinka Brothers, G.P.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
1:00 p.m.	Douglas W. Roberts Farm Accounts	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434

WEDNESDAY, DECEMBER 9, 2009

Time	30(b)(6) Deponent	Location
9:00 a.m.	Double A Farms	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
9:00 a.m.	David Polak Farms	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
1:00 p.m.	C&S Farms; K Brandon Farms and Thomas Farms, Inc.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
1:00 p.m.	RMA Farms, J.V. and D&R Grain Company	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434

THURSDAY, DECEMBER 10, 2009

Time	30(b)(6) Deponent	Location
9:00 a.m.	Delta Farms II; Woodsland Plantation Seed Co., Inc., Woodsland Farms; and Ocho Farms	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
9:00 a.m.	Kramr Bros. and Kramr Bros. Grass Farms, Inc.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
1:00 p.m.	Darby & Sherry Hoffman	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434

FRIDAY, DECEMBER 11, 2009

Time	30(b)(6) Deponent	Location
9:00 a.m.	Edward & Bernita Korenek, J.V.	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434

Time	30(b)(6) Deponent	Location
1:00 p.m.	Travis Korenek Farms	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434

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 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 20th day of November, 2009.

Respectfully submitted,

/s/John M. Hughes

John M. Hughes

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ATTORNEYS FOR THE BAYER DEFENDANTS

CERTIFICATE OF SERVICE

I certify that on this 20th day of November, 2009, I served a true and correct copy of the foregoing **REVISED NOTICE OF VIDEOTAPED 30(b)(6) DEPOSITIONS** on the following by regular United States mail:

Martin J. Phipps
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Attorneys for Plaintiffs

/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.