

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

**IN RE GENETICALLY MODIFIED RICE
LITIGATION**

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) **4:06 MD 1811 CDP**
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This filing relates to the following case:

Beaumont Rice Mills, Inc.
v. Bayer CropScience LP

Case No. 4:07-cv-0524-CDP

AFFIDAVIT OF JOHN M. HUGHES

STATE OF COLORADO)
) ss.
City and County of Denver)

John M. Hughes, being first duly sworn under oath, deposes and states as follows:

1. I am an attorney at the law firm of Bartlit Beck Herman Palenchar & Scott LLP, which is national counsel for Bayer CropScience LP. I submit this affidavit in support of The Bayer Defendants' Reply in Support of its Consolidated Motion for Summary Judgment on Claims of Beaumont Rice Mills and Reply to the Plaintiffs' Statement of Undisputed Facts. I have personal knowledge of the facts discussed herein.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts from the February 26, 2009 Deposition Transcript of Bernhard Schreiber.

FURTHER AFFIANT SAYETH NOT.

Dated at Denver, Colorado, this 2nd day of August, 2011

/s/ John M. Hughes
John M. Hughes

SWORN to and subscribed before me on this 2nd day of August, 2011, by John M. Hughes.

My Commission Expires: 10/06/2012

Witness my hand and official seal.

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| Notary Public Christine S. Betman State of Colorado City and County of Denver My Commission Expires 10/06/2012 |
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/s/ Christine S. Betman
Notary Public