

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

IN RE GENETICALLY MODIFIED RICE LITIGATION)))))	4:06 MD 1811 CDP ALL CASES
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**CORRECTED NOTICE OF VIDEOTAPED 30(b)(6) DEPOSITION
OF FARMERS RICE MILLING COMPANY, INC.**

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendant Bayer CropScience LP will take the deposition of Farmers Rice Milling Company, Inc. (“Farmers”) at the time and location identified below. The deposition will be recorded by a certified shorthand court reporter and by videotape.

Date and Time	30(b)(6) Deponent	Location
April 28, 2010 beginning at 8:00am Central	James Warshaw	Bohrer Law Firm, L.L.C. 8712 Jefferson Highway, Suite B Baton Rouge, Louisiana 70809

Pursuant to Federal Rule of Civil Procedure 30(b)(6) 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 Renée Grimmertt at renee.grimmertt@bartlit-beck.com or (303) 592-3168, 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 April, 2010.

Respectfully submitted,

/s/ John M. Hughes

John M. Hughes

William F. Goodman, III
Joseph J. Stroble
Elizabeth M. Gates
WATKINS & EAGER
The Emporium Bldg.
400 East Capitol Street, Suite 300
Post Office Box 650
Jackson, Mississippi 39205-0650

Mark E. Ferguson
Stephen Cowen
**BARTLIT BECK HERMAN PALENCHAR &
SCOTT LLP**
Courthouse Place
54 West Hubbard Street, Suite 300
Chicago, Illinois 60610

Terry Lueckenhoff, #43843
FOX GALVIN LLC
One South Memorial Drive, 12th Floor
St. Louis, Missouri 63102

Glen E. Summers
Lester Houtz
Eric R. Olson
John M. Hughes
**BARTLIT BECK HERMAN PALENCHAR
& SCOTT LLP**
1899 Wynkoop Street, 8th Floor
Denver, Colorado 80202

ATTORNEYS FOR BAYER CROPSCIENCE LP

CERTIFICATE OF SERVICE

This is to certify that I have this 21st day of April, 2010, electronically filed a copy of the foregoing with the Clerk of Court to be served by operation of the Court's electronic filing system upon the parties of record.

/s/ John M. Hughes

SCHEDULE A

The matters on which examination is requested are:

1. Farmers' claim that it was damaged by the presence of Liberty Link rice in commercial rice, including the basis, details, and documents reflecting any claimed damages.
2. All analysis, surveys, studies, or commentary on potential markets for long grain rice performed by or for Farmers from 2003 to the present.
3. All efforts by Farmers from 2003 to the present to market or sell rice to any foreign or domestic market.
4. An accounting of Farmers' sales of long grain rice and related products from 2003 to the present, including the breakdown of the volume of those sales in to domestic and foreign markets.
5. The actual profit margins received by Farmers from its rice milling operations from 2003 to the present at each of the mills operated by Farmers. This category includes margins attributable to the operation of Farmers' power plant.
6. Farmers' financial condition from 2003 to the present, including annual profits and losses, annual income statements, and any calculation of profit margins and/or milling margins. This subject extends to the financial condition of Farmers' power plant.
7. The price Farmers' paid for the rice that is the subject of its inventory loss claim and the disposition of the rice that is the subject of Farmers' inventory loss claim.
8. All steps taken by Farmers to mitigate any claimed damages.
9. All communication between Farmers and any representative or employee of any

Bayer Defendant.

10. The specific identity of sales that Farmers claims it lost due to the LLRICE announcements.
11. All guarantees, promises, or statements made by Farmers regarding whether its rice contained genetically modified rice and all steps taken to validate, support, or verify any such statements.
12. Farmers' understanding of available testing for genetically modified content of rice available from 2003 through the end of 2006.
13. All communications to or from rice industry participants regarding LLRICE or genetically modified rice.