

**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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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.

WEDNESDAY, JANUARY 6, 2010:

Time	30(b)(6) Deponent	Location
9:30 a.m.	JRJ Farms	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434
1:30 p.m.	Franz Farms II Partnership and Raymond Franz Interest, Inc. a/k/a Franz Seed Rice	The First National Bank 1000 Commerce Street Eagle Lake, Texas 77434

THURSDAY, JANUARY 7, 2010:

Time	30(b)(6) Deponent	Location
9:00 a.m.	Pederson Bros. Rice Farms; BCS Farms, Inc. and Pederson Bros., Inc.	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

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 4th day of January, 2010.

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Respectfully submitted,

/s/John M. Hughes

John M. Hughes

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CERTIFICATE OF SERVICE

I certify that on this 4th day of January, 2010, 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:

Martin J. Phipps
GOLDMAN, PENNEBAKER & PHIPPS, P.C.
One International Center
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San Antonio, TX 78216
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.