

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

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IN RE GENETICALLY MODIFIED )  
RICE LITIGATION )  
\_\_\_\_\_ )

CASE NO. 4:06 MD 1811 CDP

**This Relates to the Following Cases:**

Case No. 4:07-cv-00416-CDP  
*Texana Rice Mill, Ltd., et al.*  
*v. Bayer CropScience LP, et al.*

Case No. 4:07-cv-00524-CDP  
*Beaumont Rice Mills, Inc., et al.*  
*v. Bayer CropScience LP, et al.*

Case No. 4:07-cv-01773-CDP  
*Kennedy Rice Dryers, LLC*  
*v. Bayer CropScience LP, et al.*

Case No. 4:07-cv-01780-CDP  
*Farmers Rice Milling Co., Inc.*  
*v. Bayer CropScience, LP*

Case No. 4:07-cv-01795-CDP  
*Planters Rice Mill, LLC*  
*v. Bayer CropScience LP, et al.*

Case No. 4:08-cv-01545-CDP  
*Gulf Pacific Rice Co., Inc., et al.*  
*v. Bayer CropScience, LP, et al.*

**JOINT MOTION TO EXTEND CERTAIN DEADLINES  
FOR CERTAIN NON-PRODUCER CASES UNDER THE FIRST  
AMENDMENT TO CASE MANAGEMENT ORDER NO. 30**

The parties in the above-referenced cases jointly move to extend, as follows, the deadlines set in paragraph 3 of the First Amendment to Case Management Order No. 30 (Doc. No. 4157):

“3. Any motions for summary judgment or motions to exclude or limit expert testimony under Daubert or for any other reason must be filed no later than June 14, 2011. Briefs in opposition must be filed by July 19, 2011, and any reply brief shall be filed no later than August 2, 2011.”

This joint motion only seeks to extend the current deadlines by one week, and is made for the convenience of counsel and the parties' schedules, and not merely for the purposes of delay. Good cause exists to permit such an extension.

WHEREFORE, PREMISES CONSIDERED, the parties respectfully request that the foregoing Joint Motion be granted.

Dated this 31<sup>st</sup> day of May, 2011.

Respectfully submitted,

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By: /s/ William B. Chaney

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*Non-Producer Plaintiff Liaison Counsel, Counsel for Plaintiffs in Case Nos. 416, 1545 and 1794 and with permission in his role as liaison counsel on behalf of the Plaintiffs in Case Nos. 524, 1773, 1780 and 1795*

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**CERTIFICATE OF SERVICE**

This is to certify that I have this 31<sup>st</sup> day of May, 2011, electronically filed a copy of the foregoing with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the parties of record.

/s/ William B. Chaney  
WILLIAM B. CHANEY