

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

IN RE GENETICALLY MODIFIED)
RICE LITIGATION)

4:06 MD 1811 CDP

This pleading pertains to:

CACHE RIVER VALLEY SEED, LLC;
CULLUM SEEDS, LLC; EAST ARKANSAS
SEEDS, INC.; FARM SERVICE, INCORPORATED d/b/a
NORTHEAST ARKANSAS SEEDS; LAWHON
FARM SERVICES, INC.; RICELAND SEED
COMPANY d/b/a STRATTON SEED COMPANY;
COX & LUTER, INC. d/b/a CARTER-COX
SEEDS, INC.; LAWRENCE COUNTY SEED CO., INC.;
TANNER SEED COMPANY, LLC; G & H SEED
COMPANY, INC. and TERRAL SEED, INC.

Plaintiffs

vs.

Case No. 4:07 CV1293 CDP

BAYER CROPSCIENCE, LP; BAYER
CORPORATION; BAYER AG; BAYER
CROPSCIENCE AG; BAYER BIOSCIENCE NV;
BAYER CROPSCIENCE HOLDING, INC.;
BAYER CROPSCIENCE, LLC; and BAYER
CROPSCIENCE, INC.

Defendants

JOINT MOTION TO AMEND DEADLINES

Come the Plaintiffs and Defendants, listed above, by and through their respective counsel and for their Joint Motion to Amend Deadlines, state:

1. That the Court by previous order, Case Management Order No. 30 ("CMO No.30"), established deadlines as to the above parties.
2. That the parties hereby request that the Court amend CMO No. 30 to set the

deadlines as to the parties' case as follows:

a. Plaintiffs shall disclose expert witnesses related to the issues of individual damages and provide the reports required by Federal Rule of Civil Procedure 26(a)(2) no later than June 30, 2011 and shall make these expert witnesses available for depositions and have depositions completed no later than August 1, 2011.

b. Defendants shall disclose expert witnesses related to issues of individual damages and provide the reports required by Federal Rule of Civil Procedure 26(a)(2) no later than September 1, 2011 and shall make these experts witnesses available for depositions and have depositions completed no later than October 3, 2011.

c. The parties shall complete fact discovery no later than November 1, 2011.

d. Any motions to dismiss, motions for summary judgment, motions for judgment on the pleadings or *Daubert* motions or other motions to exclude or limit expert testimony must be filed no later than December 1, 2011. Opposition briefs shall be filed no later than thirty (30) days thereafter or January 3, 2012 and any reply brief shall be filed no later than fourteen (14) days thereafter or January 17, 2012.

WHEREFORE, the parties, as set forth above, jointly request that CMO 30 be amended to the above referenced deadlines in the matter involving the parties hereto.

Respectfully submitted,

LYONS & CONE, P.L.C.
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By: /s/ David D. Tyler

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David D. Tyler
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By: /s/ Bart C. Sullivan (with permission)

Bart C. Sullivan
Attorneys for Defendants

Certificate of Service

I, the undersigned attorney, do hereby certify that I have this 16th day of May, 2011, electronically filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which shall serve the parties of record with a copy of the foregoing by operation of the Court's electronic filing system.

/s/ David D. Tyler

David D. Tyler