

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

**IN RE GENETICALLY MODIFIED  
RICE LITIGATION**

**4:06 MD 1811 CDP**

**This document relates to:**

**RICKMERS REISMÜEHLE GmbH**

**PLAINTIFF**

**v.**

**No. 4:08-CV-0499**

**RICELAND FOODS, INC.**

**DEFENDANT**

**SECOND AMENDED NOTICE OF  
RULE 30(b)(6) DEPOSITION OF RICELAND FOODS, INC.**

Pursuant to FED. R. CIV. P. 30(b)(6), European Non-Producer Plaintiff, Rickmers Reismühle GmbH, hereby notifies the parties that the deposition of an individual(s) identified by Riceland Foods, Inc. having knowledge of the areas of inquiry set forth in Attachment "A" shall be taken on August 16, 2010, at 9:00 a.m. at the offices of Barrett & Deacon, P.A., 300 South Church Street, Third Floor, Jonesboro, Arkansas 72401. The persons so designated shall testify, for each area of testimony, as to matters known or available to Riceland Foods, Inc.

The depositions shall be taken upon oral examination pursuant to FED. R. CIV. P. 30 and the testimony shall be recorded by stenographic means before an officer duly authorized to take depositions in accordance with FED. R. CIV. P. 28. The depositions are being taken for the purpose of discovery, for use at trial, and for all other purposes permitted by law.

Pursuant to enumerated section 6 of the Deposition Protocol set forth in the Agreement Order Setting Deposition Protocol entered on December 3, 2007, please provide notice of the intent to attend this deposition by contacting Alex Gray at [agray@mwlaw.com](mailto:agray@mwlaw.com) with the name

and party affiliation of those who plan on attending the deposition, in person or by telephone, at least seven (7) days before the deposition.

DATED: July 26, 2010.

MITCHELL, WILLIAMS, SELIG,  
GATES & WOODYARD, P.L.L.C.  
425 West Capitol Avenue, Suite 1800  
Little Rock, AR 72201  
(501) 688-8800

By: /s/ John K. Baker  
John K. Baker

*Attorneys for Rickmers Reismühle GmbH*

**CERTIFICATE OF SERVICE**

I certify that on July 26, 2010, I electronically filed the Notice of Rule 30(b)(6) Deposition of Bayer CropScience LP with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the parties of record.

/s/ John K. Baker  
John K. Baker

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**ATTACHMENT "A" TO RULE 30(b)(6) NOTICE TO RICELAND FOODS, INC.**

**I. DEFINITIONS**

1. "LibertyLink" refers any and all Liberty Link rice including, but not limited to, Liberty Link Rice 06 a/k/a/ LLRice06, Liberty Link Rice 62 a/k/a LL62, Liberty Link Rice 401 a/k/a LL401, Liberty Link Rice 601 a/k/a LL601, and Liberty Link Rice 604 a/k/a LL604.

2. "Riceland" means Riceland Foods, Inc., an Arkansas agricultural cooperative, and any of its affiliated corporations, parents, subsidiaries, divisions, subdivisions, officers, directors, managers, employees, agents, or representatives.

**II. AREAS OF TESTIMONY**

1. With respect to the first 15 batches, chronologically, of Riceland rice intended for delivery in LASH barges to the EU, the drawn samples of which tested positive for the presence of LibertyLink, the date said samples were drawn, the location of the barge at the time the sample was drawn, the laboratory which confirmed the presence of LibertyLink, and the date of the test was performed.

2. With respect to the first 15 LASH barges, chronologically, loaded with Riceland rice intended for delivery to the EU, the drawn samples from which tested positive for the presence of LibertyLink, the date said samples were drawn, the company or organization whose employee drew each such sample, the location of each barge at the time each such sample was drawn, the laboratory which confirmed the presence of LibertyLink, the date each such test was performed, and the date Riceland first learned the results of each such test.

3. Nature and description of evidence known to Riceland that, prior to October 1, 2006, Euryza GmbH possessed long grain rice grown in the United States that tested positive for the presence of LibertyLink.

4. Nature and description of evidence known to Riceland that, prior to October 1, 2006, Mueller's Muhle GmbH possessed long grain rice grown in the United States that tested positive for the presence of LibertyLink.

5. Nature and description of evidence known to Riceland that, prior to October 1, 2006, Muller's Muhle GmbH possessed long grain rice grown in the United States that tested positive for the presence of LibertyLink.

6. Nature and description of evidence known to Riceland that, prior to October 1, 2006, Soufflet Alimentaire S.A. possessed long grain rice grown in the United States that tested positive for the presence of LibertyLink.

7. Nature and description of evidence known to Riceland that, prior to October 1, 2006, Nouvelle Riserie du Nord possessed long grain rice grown in the United States that tested positive for the presence of LibertyLink.