

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

IN RE GENETICALLY MODIFIED

4:06 MD 1811 CDP

This document relates to:

VEETEE RICE LIMITED, a limited company of the United Kingdom

PLAINTIFF

No. 4:07-CV-01211 CDP

RICELAND FOODS, INC., an Arkansas agricultural cooperative;  
PRODUCERS RICE MILL, INC., an Arkansas agricultural cooperative;  
RIVIANA FOODS, INC., a Delaware corporation;  
BAYER CROPSCIENCE LP, a Delaware limited partnership;  
BAYER AG, a German corporation;  
BAYER CROPSCIENCE AG, a German corporation; and  
BAYER CORPORATION, an Indiana corporation.

DEFENDANTS

**NOTICE OF VIDEOTAPED  
RULE 30(b)(6) DEPOSITION OF VEETEE RICE LTD.**

**PLEASE TAKE NOTICE** that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the deposition of Veetee Rice Ltd. will be conducted by Defendant Riceland Foods, Inc. beginning at 9:00 A.M. (Central) on August 24, 2010, or as may be agreed by the parties, at the offices of Thompson Coburn, LLP, One US Bank Plaza, St. Louis, MO 63103, and continuing day-to-day, by stenographic and video means before a Notary Public, or other person authorized to take oaths, and shall continue from day-to-day until completed.

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 the above deposition by contacting Christopher Hohn at [chohn@thompsoncoburn.com](mailto:chohn@thompsoncoburn.com) or (314) 552-6159 with the name and party affiliation of those who plan on attending the deposition at least seven

(7) days prior to the deposition. For those participants attending the deposition via telephonic means, the U.S. Call-in Number is 888-839-7340, the International Call-in Number is 719-234-7432, and the Participant Passcode is 314 552 6159.

Respectfully submitted,

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Attorneys for Riceland Foods, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served electronically by means of the Court's CM/ECF electronic filing system on June 15, 2010, on all counsel of record.

/s/ Christopher M. Hohn

**DEFINITIONS**

1. “Veetee” refers to Veetee Rice Ltd. and all subsidiaries, affiliate entities and current or former officers, directors, agents or employees of Veetee Rice Ltd. in any location whatsoever.

2. “Riceland” refers to Riceland Foods, Inc. and all officers, agents or employees of Riceland Foods, Inc.

**SUBJECT MATTER OF TESTIMONY**

**A. TESTING, TRACING AND IDENTITY PRESERVATION.**

1. All tests of rice acquired and/or which Veetee is aware showing a positive result for GM content for any rice purportedly obtained from Riceland and/or which Veetee contends was obtained from Riceland.

2. All factual information and/or assumptions underlying Veetee’s contention that the GM was traceable to rice supplied by Riceland.

3. Any traceability methodologies, procedures, software, hardware, policies, practice, or procedures employed by Veetee since January 1, 2005.

4. Any identity preservation methodologies, procedures, software, hardware, policies, practices, or procedures employed by Veetee since January 1, 2005.

5. The manufacturer, operation, capacities and capabilities of any Veetee's tracing and/or identity preservation system(s) used by Veetee since January 1, 2005.
6. The contents, and Veetee's interpretation of, Veetee 07084-07899.
7. The manufacturer, operation, capacities and capabilities of the purported rice tracing and/or identification system(s) set forth in Veetee 07084-07899.
8. Veetee's ability to test, trace and/or identify rice from receipt to ultimate customer at any point in the system, including the underlying supplier(s), transportation methods and containers, storage facilities, processing & packaging lines, and shipment methods.
9. Veetee's production of documents – and Veetee's interpretation thereof – produced by Veetee in this matter since the date of Veetee's last corporate designee deposition.
10. Veetee's participation in industry trade groups, including, but not limited to, FERM and NERMA related to testing, the results therefrom, or the decision not to test, for the presence of Liberty Link rice.
11. Veetee's communications, contractual agreements, and documents received to/from Wercom (and Veetee's interpretation thereof) related to GM testing, tracing and/or identity preservation of rice obtained from Riceland and/or other rice suppliers from January 1, 2000 to present.

**B. VEETEE'S TRANSPORTATION, STORAGE, PROCESSING AND PACKAGING PRACTICES RELATED TO TESTING, TRACING AND/OR IDENTITY PRESERVATION CAPABILITIES.**

1. Veetee's practices for U.S. rice from January 1, 2005 to the present, regarding:
  - (a) Veetee's intake, transportation, storage, processing and packaging methods and their interaction with Veetee's purported ability to test, trace and/or identity preserve any rice.
  - (b) Veetee's intake, transportation, storage, processing and packaging methods and their interaction with the purported results of Veetee's testing, tracing and/or identity preservation rice that Veetee contends demonstrates that the rice was obtained from Riceland.

**C. BIOGENETIC SERVICES, INC.**

1. The test results Veetee received from Biogenetic Services, Inc. on or about June 11, 2010, and Veetee's understanding and interpretation of such results.

2. Identification of rice Veetee has selected for additional testing based upon the June 11, 2010 Biogenetic Services, Inc. test results, the basis for such selection, and the results (and Veetee's understanding and interpretation of such results) of such future testing, if any are completed at the time of this deposition.

3. Veetee's complete tracing and/or identity preservation of the rice Veetee selected for additional testing, or that selected by Riceland.