

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

<b>IN RE GENETICALLY MODIFIED</b>	)	<b>4:06 MD 1811 CDP</b>
<b>RICE LITIGATION</b>	)	
	)	<b>ALL CASES</b>
	)	
	)	

**NOTICE OF VIDEOTAPED 30(b)(6) DEPOSITION  
OF NATURIS**

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendant Bayer CropScience LP will take the deposition of Naturis S.p.a. (“Naturis”) at the time and location identified below. The deposition will be recorded by a certified shorthand court reporter and by videotape.

<b>Date and Time</b>	<b>30(b)(6) Deponent</b>	<b>Location</b>
May 11, 2010 beginning at 9:00am Central	Naturis S.p.a.	Looper Reed & McGraw 1300 Post Oak Blvd. Suite 2000 Houston, TX 77056

Pursuant to Federal Rule of Civil Procedure 30(b)(6) 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 Renée Grimmertt at [renee.grimmertt@bartlit-beck.com](mailto:renee.grimmertt@bartlit-beck.com) or (303) 592-3168, with the names and party affiliations of those who plan on attending the deposition at least seven (7) days before the deposition.

Dated this 29th day of April, 2010.

Respectfully submitted,

/s/ John M. Hughes

John M. Hughes

William F. Goodman, III  
Joseph J. Stroble  
Elizabeth M. Gates  
**WATKINS & EAGER**  
The Emporium Bldg.  
400 East Capitol Street, Suite 300  
Post Office Box 650  
Jackson, Mississippi 39205-0650

Mark E. Ferguson  
Stephen Cowen  
**BARTLIT BECK HERMAN PALENCHAR &  
SCOTT LLP**  
Courthouse Place  
54 West Hubbard Street, Suite 300  
Chicago, Illinois 60610

Terry Lueckenhoff, #43843  
**FOX GALVIN LLC**  
One South Memorial Drive, 12th Floor  
St. Louis, Missouri 63102

Glen E. Summers  
Lester Houtz  
Eric R. Olson  
John M. Hughes  
**BARTLIT BECK HERMAN PALENCHAR  
& SCOTT LLP**  
1899 Wynkoop Street, 8<sup>th</sup> Floor  
Denver, Colorado 80202

***ATTORNEYS FOR BAYER CROPSCIENCE LP***

**CERTIFICATE OF SERVICE**

This is to certify that I have this 29th day of April, 2010, electronically filed a copy of the foregoing with the Clerk of Court to be served by operation of the Court's electronic filing system upon the parties of record.

/s/ John M. Hughes

**SCHEDULE A**

The matters on which examination is requested are:

- (1) The events surrounding the formation of the business relationship between Naturis and Gulf Pacific in 2006.
- (2) Any contract, agreement, or business relationship between Gulf Pacific and Naturis concerning instantized rice. This subject includes the negotiation and formation of any contracts, agreements or business relationships concerning instantized rice, the terms of any such contracts, agreements, or business relationships, the parties' performance under any such contracts, agreements or business relationships, and the termination and/or breach of any such contracts, agreements, or business relationships.
- (3) All projections, forecasts, or business plans relating to the agreement between Naturis and Gulf Pacific concerning instantized rice, including the basis for any and all volume and pricing projections.
- (4) Naturis' purchases of rice from Gulf Pacific from 2006 to the present.
- (5) From 2003 to the present, the nature of Naturis' instant rice business, including the markets where Naturis sells instant rice, the volume of instant rice sold by Naturis, the type of instant rice sold by Naturis, where Naturis acquires the rice that it instantizes, and the profit margins realized by Naturis on its instant rice sales.
- (6) Naturis' purchase of U.S. long grain rice from August 18, 2006 to the present and Naturis' plans, if any, to purchase U.S. long grain rice in the future.