

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

IN RE GENETICALLY MODIFIED RICE LITIGATION))))))))	4:06 MD 1811 CDP
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This Document applies to the following cases:

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

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

Phoenix Advisors, Ltd. v. Bayer CropScience LP, et al.
Case No.: 4:08-cv-1794-CDP

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

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

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

Beaumont Rice Mills, Inc., et al. v. Bayer CropScience LP, et al.
Case No.: 4:07-cv-0524-CDP

NOTICE OF INTENTION TO TAKE ORAL DEPOSITIONS

PLEASE TAKE NOTICE that Plaintiffs will take the following oral depositions. The depositions will be taken before a certified shorthand reporter or other officer authorized by law to administer oaths. The depositions are to be recorded by stenographic means, and will also be videotaped.

The depositions will commence at the time, date, and location as follows, or at such other reasonable location as the parties may agree upon, and continue from day to day until completed

or adjourned by the mutual consent of the parties. Pursuant to the Agreed Order Setting Deposition Protocol (Doc. 474), for those counsel that wish to attend any of the depositions telephonically, please contact Suzy Langley at slangley@lrmlaw.com or (214) 954-4135 at least seven (7) days before the deposition. Pursuant to an agreement of Lead Counsel, the court reporter shall be from Golkow Technologies, Inc. A copy of the transcript, videotape (if videotaped), and exhibits of each deposition may be obtained by calling 1-877-370-3377 or via email at deps@golkow.com.

DEPONENT:	David K. A. Mordecai
TIME AND DATE:	April 6, 2011 at 9:00 a.m. Eastern Time (8:00 a.m. Central Time)
LOCATION:	King & Spalding 1180 Peachtree St. NE, Suite 1700 Atlanta, GA 30309

DEPONENT:	Barry Goodwin
TIME AND DATE:	April 8, 2011 at 9:00 a.m. Eastern Time (8:00 a.m. Central Time)
LOCATION:	Ellis & Winters 1100 Crescent Green Drive, Suite 200 Cary, NC 27518

DEPONENT:	Gustavo Bamberger
TIME AND DATE:	April 12, 2011 at 9:00 a.m. Central Time
LOCATION:	Bartlit Beck Herman Palenchar & Scott LLP Courthouse Place 54 West Hubbard Street, Suite 300 Chicago, IL 60654

DEPONENT:	Michael Chase
TIME AND DATE:	April 19, 2011 at 9:00 a.m. Central Time
LOCATION:	Looper Reed & McGraw 1601 Elm Street, Suite 4600 Dallas, TX 75201

DEPONENT:	David Hall
TIME AND DATE:	April 20-21, 2011 at 9:00 a.m. Central Time
LOCATION:	Looper Reed & McGraw 1601 Elm Street, Suite 4600 Dallas, TX 75201

DEPONENT:	Quentin Mimms
TIME AND DATE:	April 20-22, 2011 at 9:00 a.m. Central Time
LOCATION:	Looper Reed & McGraw 1601 Elm Street, Suite 4600 Dallas, TX 75201

Dated: April 1, 2011.

LOOPER REED & MCGRAW, P.C.

By: /s/ William B. Chaney

WILLIAM B. CHANEY
Texas State Bar No. 04108500
ANDREW K. YORK
Texas State Bar No. 24051554

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Dallas, Texas 75201
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Facsimile: 214.953.1332

ATTORNEYS-IN-CHARGE FOR PLAINTIFFS
IN CASES 4:07-CV-00416-CDP, 4:08-CV-1545-
CDP, AND 4:08-CV-1794-CDP, AND AS NON-
PRODUCER LIAISON COUNSEL WITH
PERMISSION OF THOSE PARTIES' COUNSEL
OF RECORD

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have this 1st day of April, 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