

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

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**IN RE GENETICALLY MODIFIED RICE  
LITIGATION**

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**4:06 MD 1811 CDP**

**NOTICE OF ORAL AND VIDEOTAPED DEPOSITION**

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 the following deponents as listed below, continuing thereafter until completed. This deposition is noticed in all cases. The deposition will be recorded by a certified shorthand court reporter and by videotape.

DATE	30(b)(6)DEPONENT	LOCATION OF DEPOSITION
December 14, 2010 8:00 am Central	James Schiurring James Brent Schiurring Dos Arros Farms, Inc. Turkey Creek Rice, Inc. Turkey Creek Organic Rice, In.	DUCKETT, BOULIGNY & COLLINS, LLP 207 W. Jackson El Campo, Texas 77437

Pursuant to Federal Rules of Civil Procedure 30(b)(6), for each deponent 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 on matters known to or reasonably available to the deponent for the topics covered by Schedule A of 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 Emilie Baine at [ebaine@fulbright.com](mailto:ebaine@fulbright.com) or (210) 270-7190, with the name and party affiliation of those who plan on attending the deposition.

Dated this 3rd day of December, 2010.

Respectfully submitted,

/s/ John M. Hughes  
John M. Hughes

William F. Goodman, III  
Joseph J. Stroble  
Elizabeth M. Gates  
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***ATTORNEYS FOR BAYER CROPSCIENCE LP***

**CERTIFICATE OF SERVICE**

This is to certify that I have this 3rd day of December, 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. All allegations set forth in any Complaint filed by Plaintiff and/or Master Complaint in this action.
2. The discovery requests served on Plaintiff and Plaintiff's responses in this action, including the Plaintiff Fact Sheet and steps taken to comply with relevant discovery requests and related orders in this action.
3. All damages alleged to relate to Liberty Link rice, including all actions taken to avoid or mitigate claimed damages.
4. The ownership, formation, and operation of the Plaintiff business entity and all property and business interests associated with the Plaintiff business entity.