

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

IN RE GENETICALLY MODIFIED RICE LITIGATION)))))	4:06 MD 1811 CDP ALL CASES
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NOTICE OF DEPOSITION OF PRODUCERS RICE MILL, INC. 30(B)(6)

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendant Bayer CropScience LP will take the deposition of Producers Rice Mill, Inc. at the time and location identified below. The deposition shall be taken by stenographic means before a notary public, or other person authorized to take oaths, and shall continue from day to day until completed.

Deponent	Location	Date	Time
Producers Rice Mill, Inc. 30(b)(6) representative	The Arkansas Bar Center 2224 Cottondale Lane Little Rock, AR 72202	May 5, 2010	12:00 Noon

Pursuant to Federal Rule 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 to the matters known to or reasonably available to the deponent for the topics covered by **Schedule A** attached 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 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.

All parties are invited to appear and participate as they deem fit and proper and as permitted by the Federal Rules of Civil Procedure and the relevant Orders entered in these actions.

Dated this 29th day of April, 2010.

Respectfully submitted,

/s/ Charles Jason Rother
Charles Jason Rother

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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/ Charles Jason Rother
Charles Jason Rother

SCHEDULE A

The identity, location, name, custodian, author, and recipient of documents created and/or maintained by Producers Rice Mill, Inc. that contain, reflect, summarize and/or communicate financial and accounting information, including, but not limited to:

- 1) The identity, location, name, custodian, author, and recipient of documents created and/or maintained by Producers Rice Mill, Inc. that contain, reflect, summarize and/or communicate financial and accounting information, including, but not limited to:
 - a. all costs incurred by Producers Rice Mill, Inc. related to the purchase, storage, milling, processing, packaging, shipment, or any other step in Producers Rice Mill, Inc.'s long grain rice businesses;
 - b. all income received by Producers Rice Mill, Inc. related to the purchase, storage, milling, processing, packaging, shipment, or any other step in Producers Rice Mill, Inc.'s long grain rice businesses;
 - c. all calculations, summaries, descriptions, or statements relating to margins, profits, cost of goods sold, or similar information;
 - d. financial statements or similar documents;
 - e. profit and loss statements or similar documents;
 - f. hedging costs, profits, transactions, summaries, or analysis; or
 - g. statements prepared for external auditors, banks, lenders, accountants, tax preparers, consultants, USDA or other entities or governments for whom financial or inventory data is prepared.
- 2) The type of computer or storage system(s) used to collect, maintain, search, and/or store Producers Rice Mill, Inc.'s financial and accounting information, including but not limited to:
 - a. the time frame of use,
 - b. the scope and date of the data or information stored,
 - c. methods of searching or extracting data or information, f
 - d. format of the data or information (including any extracted or exported data or information),
 - e. any automatic deletion of data or information by the system,

f. and any backup or duplication systems containing any such financial or accounting information.