

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

**IN RE GENETICALLY MODIFIED RICE
LITIGATION**

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SECOND AMENDED NOTICE OF VIDEOTAPED 30(b)(6) DEPOSITIONS

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Defendant Bayer CropScience LP will take the depositions of the following deponents as listed below, continuing thereafter until completed. This notice applies to all cases. The depositions will be recorded by a certified shorthand court reporter and by videotape.

DATE	30(b)(6)DEPONENT	LOCATION OF DEPOSITION
September 28, 2010 9:00 am Central	L.G.Raun/Lowell Farms JV/LR Farms JV/Wolf Run Farms, Inc./Rojo, Inc.	DUCKETT, BOULIGNY & COLLINS, LLP 207 W. Jackson El Campo, Texas 77437
September 29, 2010 9:00 am Central	Mark Waligura	DUCKETT, BOULIGNY & COLLINS, LLP 207 W. Jackson El Campo, Texas 77437
September 29, 2010 1:00 pm Central	JRS Farms	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 or (210) 270-7190, with the name and party affiliation of those who plan on attending the deposition.

Dated this 24th day of September, 2010.

Respectfully submitted,

/s/ John M. Hughes
John M. Hughes

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ATTORNEYS FOR BAYER CROPSCIENCE LP

CERTIFICATE OF SERVICE

This is to certify that I have this 24th day of September, 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.