

**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 VIDEOTAPED 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. The depositions will be recorded by a certified shorthand court reporter and by videotape.

<b>DATE</b>	<b>30(b)(6)DEPONENT</b>	<b>LOCATION OF DEPOSITION</b>
November 29, 2010 9:00 am Central	Michael Lalande and Tommy Lalande	THE SONIER FIRM Two South Magdalen Square Abbeville, LA 70510
November 29, 2010 1:00 pm Central	Jonathan Girouard	THE SONIER FIRM Two South Magdalen Square Abbeville, LA 70510
November 30, 2010 9:00 am Central	Marceaux Farm Partners	THE SONIER FIRM Two South Magdalen Square Abbeville, LA 70510
November 30, 2010 1:00 pm Central	Neal Landry Farms	THE SONIER FIRM Two South Magdalen Square Abbeville, LA 70510
December 1, 2010 9:00 am Central	Ryan and Nicole Primeaux	GERARD, SCOFIELD, SINGLETARY & Pahorelsky 901 Lakeshore Dr., Ste. 900 Lake Charles, LA 70701
December 1, 2010 1:00 pm Central	Dale and Dorothy Hughes	GERARD, SCOFIELD, SINGLETARY & Pahorelsky 901 Lakeshore Dr., Ste. 900 Lake Charles, LA 70701

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 Emile 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 15th day of November, 2010.

Respectfully submitted,

/s/ John M. Hughes  
John M. Hughes

William F. Goodman, III  
Joseph J. Stroble  
Elizabeth M. Gates  
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Denver, Colorado 80202

***ATTORNEYS FOR BAYER CROPSCIENCE LP***

**CERTIFICATE OF SERVICE**

This is to certify that I have this 15th day of November, 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 LibertyLink 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.