

**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
)	
)	

This document relates to:

Gulf Pacific Rice Co., Inc., et al.
v. Bayer CropScience, L.P., et al.

Case No. 4:08-cv-1545-CDP

**NOTICE OF VIDEOTAPED 30(b)(6) DEPOSITION
OF GULF PACIFIC RICE CO., INC.**

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 Gulf Pacific Rice Co., Inc., Gulf Rice Milling, Inc., and Harvest Rice, Inc. (collectively, “Gulf Pacific”) at the time and location identified below. The deposition will be recorded by a certified shorthand court reporter and by videotape.

Date and Time	30(b)(6) Deponent	Location
May 12-13, 2010 beginning at 9:00am Central	Gulf Pacific	Looper Reed & McGraw 1300 Post Oak Blvd. Suite 2000 Houston, TX 77056

Pursuant to Federal Rule of Civil Procedure 30(b)(6) 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** 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.

Dated this 6th day of May, 2010.

Respectfully submitted,

/s/ John M. Hughes
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ATTORNEYS FOR BAYER CROPSCIENCE LP

CERTIFICATE OF SERVICE

This is to certify that I have this 6th day of May, 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. Gulf Pacific's claim that it was damaged by the presence of Liberty Link rice in commercial rice, including the basis, details, and documents reflecting any claimed damages.
2. All analysis, surveys, studies, or commentary on potential markets for long grain rice performed by or for Gulf Pacific from 2003 to the present.
3. All efforts by Gulf Pacific from 2003 to the present to market or sell rice to any foreign or domestic market.
4. An accounting of Gulf Pacific's sales of long grain rice and related products from 2003 to the present, including the breakdown of the volume of those sales in to domestic and foreign markets.
5. All efforts by Gulf Pacific to enter the instant and instantized rice business, including any contracts, agreements, or business relationships with Riseria Monferrato S.p.a., Naturis S.p.a., and Sage V Foods, LLC. This subject includes the negotiation and formation of any such contracts, agreements or business relationships, the parties' performance under any such contracts, agreements, or business relationships, and the termination and/or breach of any such contracts, agreements or business relationships.
6. The actual profit margins received by Gulf Pacific from its rice milling operations from 2003 to the present at each of the mills operated by Gulf Pacific.
7. The events and circumstances relating to the establishment and closure of Gulf Pacific's Houston and Russian export sales offices.

8. Gulf Pacific's financial condition from 2003 to the present, including annual profits and losses, annual income statements, and any calculation of margin.
9. All steps taken by Gulf Pacific to mitigate any claimed damages.
10. All communication between Gulf Pacific and any representative or employee of any Bayer Defendant.
11. The specific identity of sales that Gulf Pacific claims it lost due to the LLRICE announcements.
12. All guarantees, promises, or statements made by Gulf Pacific regarding whether its rice contained genetically modified rice and all steps taken to validate, support, or verify any such statements.
13. Gulf Pacific's understanding of available testing for genetically modified content of rice available from 2003 through the end of 2006.
14. All communications to or from rice industry participants regarding LLRICE or genetically modified rice.