

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

**IN RE GENETICALLY MODIFIED
RICE LITIGATION**

4:06 MD 1811 CDP

This document relates to:

RICKMERS REISMÜEHLE GmbH

PLAINTIFF

v.

No. 4:08-CV-0500

PRODUCERS RICE MILL, INC.

DEFENDANT

**SECOND AMENDED NOTICE OF RULE 30(b)(6)
DEPOSITION OF PRODUCERS RICE MILL, INC.**

Pursuant to FED. R. CIV. P. 30(b)(6), European Non-Producer Plaintiff, Rickmers Reismühle GmbH, hereby notifies the parties that the depositions of individuals identified by Producers Rice Mill, Inc. having the first-hand knowledge of the areas of inquiry set forth in Attachment "A" shall be taken on September 17, 2010, at 9:00 a.m. at the offices of Womack, Landis, Phelps, McNeill & McDaniel, 301 W. Washington, Jonesboro, Arkansas 72401. The persons so designated shall testify, for each area of testimony, as to matters known or available to Producers Rice Mill, Inc.

The depositions shall be taken upon oral examination pursuant to FED. R. CIV. P. 30 and the testimony shall be recorded by stenographic means before an officer duly authorized to take depositions in accordance with FED. R. CIV. P. 28. The depositions are being taken for the purpose of discovery, for use at trial, and for all other purposes permitted by law.

Pursuant to enumerated section 6 of the Deposition Protocol set forth in the Agreement Order Setting Deposition Protocol entered on December 3, 2007, please provide notice of the intent to attend this deposition by contacting Alex Gray at agray@mwlaw.com with the name

and party affiliation of those who plan on attending the deposition, in person or by telephone, at least seven (7) days before the deposition.

DATED: August 25, 2010.

MITCHELL, WILLIAMS, SELIG,
GATES & WOODYARD, P.L.L.C.
425 West Capitol Avenue, Suite 1800
Little Rock, AR 72201
(501) 688-8800

By: /s/ John K. Baker
John K. Baker

Attorneys for Rickmers Reismühle GmbH

CERTIFICATE OF SERVICE

I certify that on August 25th, 2010, I electronically filed the Second Amended Notice of Rule 30(b)(6) Deposition of Producers Rice Mill, Inc. with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the parties of record.

/s/ John K. Baker
John K. Baker

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PRODUCERS RICE MILL, INC.

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ATTACHMENT "A" TO RULE 30(b)(6) NOTICE TO PRODUCERS RICE MILL, INC.

I. DEFINITIONS

1. "LibertyLink" refers any and all Liberty Link rice including, but not limited to, Liberty Link Rice 06 a/k/a/ LLRice06, Liberty Link Rice 62 a/k/a LL62, Liberty Link Rice 401 a/k/a LL401, Liberty Link Rice 601 a/k/a LL601, and Liberty Link Rice 604 a/k/a LL604.

2. "PRM" means Producers Rice Mill, Inc., an Arkansas agricultural cooperative, and any of its affiliated corporations, parents, subsidiaries, divisions, subdivisions, officers, directors, managers, employees, agents, or representatives.

II. AREAS OF TESTIMONY

A. Batches

1. With respect to the first 15 batches, chronologically, of PRM rice intended for delivery in LASH barges to the EU, the drawn samples of which tested positive for the presence of LibertyLink, the date said samples were drawn, the location of the barge at the time the sample was drawn, the laboratory which confirmed the presence of LibertyLink, and the date the test was performed.

2. With respect to the first 15 batches, chronologically, of PRM rice intended for delivery in LASH barges to the EU, the drawn samples of which tested positive for the presence of genetically modified organisms (“GMO”), the date said samples were drawn, the location of the barge at the time the sample was drawn, the laboratory which confirmed the presence of GMO, and the date the test was performed.

3. With respect to the first 15 batches, chronologically, of PRM rice intended for delivery in LASH barges to the EU, the drawn samples of which tested positive for the presence of LibertyLink using the 35S/bar test, the date said samples were drawn, the location of the barge at the time the sample was drawn, the laboratory which confirmed the presence of LibertyLink, and the date the 35S/bar test was performed.

4. With respect to the first 15 batches, chronologically, of PRM rice intended for delivery in LASH barges to the EU, the drawn samples of which tested positive for the presence of GMO using the 35S/bar test, the date said samples were drawn, the location of the barge at the time the sample was drawn, the laboratory which confirmed the presence of GMO, and the date the 35S/bar test was performed.

B. LASH Barges

5. With respect to the first 15 LASH barges, chronologically, loaded with PRM rice intended for delivery to the EU, the drawn samples from which tested positive for the presence of LibertyLink, the date said samples were drawn, the company or organization whose employee drew each such sample, the location of each barge at the time each such sample was drawn, the laboratory which confirmed the presence of LibertyLink, the date each such test was performed, and the date PRM first learned the results of each such test.

6. With respect to the first 15 LASH barges, chronologically, loaded with PRM rice intended for delivery to the EU, the drawn samples from which tested positive for the presence of GMO, the date said samples were drawn, the company or organization whose employee drew each such sample, the location of each barge at the time each such sample was drawn, the laboratory which confirmed the presence of GMO, the date each such test was performed, and the date PRM first learned the results of each such test.

7. With respect to the first 15 LASH barges, chronologically, loaded with PRM rice intended for delivery to the EU, the drawn samples from which tested positive for the presence of LibertyLink using the 35S/bar test, the date said samples were drawn, the company or organization whose employee drew each such sample, the location of each barge at the time each such sample was drawn, the laboratory which confirmed the presence of LibertyLink, the date each such 35S/bar test was performed, and the date PRM first learned the results of each such 35S/bar test.

8. With respect to the first 15 LASH barges, chronologically, loaded with PRM rice intended for delivery to the EU, the drawn samples from which tested positive for the presence of GMO using the 35S/bar test, the date said samples were drawn, the company or organization whose employee drew each such sample, the location of each barge at the time each such sample was drawn, the laboratory which confirmed the presence of GMO, the date each such 35S/bar test was performed, and the date PRM first learned the results of each such 35S/bar test.

C. Customers

9. Nature and description of evidence known to PRM that, prior to October 1, 2006, Euryza GmbH possessed long grain rice grown in the United States that tested positive for the presence of LibertyLink.

10. Nature and description of evidence known to PRM that, prior to October 1, 2006, Euryza GmbH possessed long grain rice grown in the United States that tested positive for the presence of GMO.

11. Nature and description of evidence known to PRM that, prior to October 1, 2006, Mueller's Muhle GmbH possessed long grain rice grown in the United States that tested positive for the presence of LibertyLink.

12. Nature and description of evidence known to PRM that, prior to October 1, 2006, Mueller's Muhle GmbH possessed long grain rice grown in the United States that tested positive for the presence of GMO.

13. Nature and description of evidence known to PRM that, prior to October 1, 2006, Muller's Muhle GmbH possessed long grain rice grown in the United States that tested positive for the presence of LibertyLink.

14. Nature and description of evidence known to PRM that, prior to October 1, 2006, Muller's Muhle GmbH possessed long grain rice grown in the United States that tested positive for the presence of GMO.

15. Nature and description of evidence known to PRM that, prior to October 1, 2006, Soufflet Alimentaire S.A. possessed long grain rice grown in the United States that tested positive for the presence of LibertyLink.

16. Nature and description of evidence known to PRM that, prior to October 1, 2006, Soufflet Alimentaire S.A. possessed long grain rice grown in the United States that tested positive for the presence of GMO.

17. Nature and description of evidence known to PRM that, prior to October 1, 2006, Nouvelle Riserie du Nord possessed long grain rice grown in the United States that tested positive for the presence of LibertyLink.

18. Nature and description of evidence known to PRM that, prior to October 1, 2006, Nouvelle Riserie du Nord possessed long grain rice grown in the United States that tested positive for the presence of GMO.