IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 05-CV-329-TCK-SAJ
	)	
TYSON FOODS, INC., et al.,	)	
	)	
Defendants.	)	

STATE OF OKLAHOMA'S JULY 10, 2006 SET OF
REQUESTS FOR PRODUCTION TO COBB VANTRESS, INC.

TO: Cobb Vantress, Inc.
c/o Stephen L. Jantzen, Esq.
Patrick M. Ryan, Esq.
Paula M. Buchwald, Esq.
Ryan, Whaley & Coldiron, P.C.
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900 Robinson Renaissance
Oklahoma City, Ok 73102

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1501 K Street, N.W.
Washington, D.C. 20005-1401

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The Three Sisters Building
214 West Dickson Street
Fayetteville, Ar 72701-5221

Pursuant to Fed. R. Civ. P. 26 and 34, plaintiff State of Oklahoma, ex rel. W.A. Drew Edmondson, in his capacity as Attorney General of the State of Oklahoma, and Oklahoma Secretary of the Environment, C. Miles Tolbert, in his capacity as the Trustee for Natural Resources for the State of Oklahoma under CERCLA ("the State"), requests that Cobb Vantress, Inc., respond to the following requests for production within 30 days of service, and that Cobb Vantress, Inc., produce and permit timely inspection and copying by counsel for the State of all responsive documents and materials at the offices of Riggs, Abney, Neal, Turpen, Orbison & Lewis, 502 West Sixth Street, Tulsa, OK 74119, or such other location to which the parties mutually agree.

A. Definitions and Instructions

EXHIBIT
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For purposes of this discovery, the following terms are intended to have the following meanings:

1. "You" is intended to mean Cobb Vantress, Inc., including its predecessors and successors, its present and former officers, executives, directors, agents, servants, employees, attorneys, insurance carriers, consultants, experts, investigators and other persons or firms acting or purporting to act on its behalf.

2. The connectives "and" and "or" are to be construed either disjunctively or conjunctively as necessary to bring within the scope of these requests for production all responses that might otherwise be construed to be outside of their scope.

3. The term "any" includes "all" and "each"; the term "all" includes "any" and "each"; and the term "each" includes "any" and "all."

4. The term "documents and materials" means any writing, or printed material, drawing, film, picture, videotape, chart, photograph, phonograph record, tape record, mechanical or electronic sound recording or transcript thereof, computerized data and other electronically-recorded information (which includes, but is not limited to, CDs, DVDs, hard drives, floppy disks, flash drives, facsimiles, voice mail messages and files, backup voice mail files, e-mail messages and files, backup e-mail files, deleted e-mails, data files, program files, backup and archival tapes, temporary files, system history files, website information stored in textual, graphical or audio format, website log files, cache files, cookies, deleted files and other electronically-recorded information), notices, memoranda, diaries, minutes, correspondence, reports, studies, analyses, contracts, invoices, bills, vouchers, worksheets, jottings, notes, letters, abstracts, audits, charts, checks, diagrams, drafts, summaries, compilations, computations, other formal and informal writings or tangible preservation of information, or samples.

5. The term "run-off / discharge / release" means any running-off, discharging, releasing, spilling, leaking, pumping, pouring, emitting, emptying, injecting, escaping, leaching, dumping, seeping, or disposing into the environment.

6. References to the singular are to be construed to include the plural and vice versa.

7. If there is any responsive information which you decline to provide on the ground of a claim of attorney client privilege or attorney work product, make the claim expressly and describe the nature of the documents, communications, or things not produced or disclosed in a manner that will enable the State to assess the applicability of the claimed privilege or protection.

B. Requests

Request for Production No. 1: Please produce all documents and materials reflecting, referring to or relating to any contracts between you and poultry growers located in the Illinois River Watershed ("IRW") since 1970, including the contracts themselves, any amendments or changes to the contracts considered, proposed or adopted thereto, and any drafts of the contracts, amendments or changes.

* * *

Request for Production No. 2: Please produce all documents and materials reflecting, referring to or relating to the ingredients and composition of your present and / or historical feed formulas used at poultry growing operations within the IRW.

Request for Production No. 3: Please produce all documents and materials reflecting, referring to or relating to any additives or supplements to your present and / or historical feed formulas used at poultry growing operations within the IRW.

Request for Production No. 4: Please produce all documents and materials reflecting, referring to or relating to any hormones added to your present and / or historical feed formulas used at poultry growing operations within the IRW.

Request for Production No. 5: Please produce all documents and materials reflecting, referring to or relating to any hormones, medications, antibiotics and / or vaccinations provided or given, presently or in the past, to your birds raised at poultry growing operations within the IRW.

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Request for Production No. 6: Please produce all documents and materials reflecting, referring to or relating to the identity of the constituents of poultry waste / poultry litter / poultry manure.

Request for Production No. 7: Please produce all documents and materials reflecting, referring to or relating to any reports, studies, analyses, testing, investigations or research of the composition or constituents of poultry waste / poultry litter / poultry manure.

Request for Production No. 8: Please produce all documents and materials reflecting, referring to or relating to any reports, studies, analyses, testing, investigations or research of the composition or constituents of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you.

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Request for Production No. 9: Please produce all documents and materials reflecting, referring to or relating to run-off / discharge / release of poultry waste / poultry litter /

poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been stored.

Request for Production No. 10: Please produce all documents and materials reflecting, referring to or relating to run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been stored.

Request for Production No. 11: Please produce all documents and materials reflecting, referring to or relating to run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been stored.

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Request for Production No. 12: Please produce all documents and materials reflecting, referring to or relating to run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been land applied.

Request for Production No. 13: Please produce all documents and materials reflecting, referring to or relating to run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been land applied.

Request for Production No. 14: Please produce all documents and materials reflecting, referring to or relating to run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which

poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been land applied.

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Request for Production No. 15: Please produce all documents and materials reflecting, referring to or relating to any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been stored.

Request for Production No. 16: Please produce all documents and materials reflecting, referring to or relating to any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been stored.

Request for Production No. 17: Please produce all documents and materials reflecting, referring to or relating to any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been stored.

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Request for Production No. 18: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental effects / impacts of run-off / discharge / release of

poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been stored.

Request for Production No. 19: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been stored.

Request for Production No. 20: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been stored.

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Request for Production No. 21: Please produce all documents and materials reflecting, referring to or relating to any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been stored.

Request for Production No. 22: Please produce all documents and materials reflecting, referring to or relating to any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land

or locations within the IRW on which poultry waste / poultry litter / poultry manure has been stored.

Request for Production No. 23: Please produce all documents and materials reflecting, referring to or relating to any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been stored.

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Request for Production No. 24: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been stored.

Request for Production No. 25: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been stored.

Request for Production No. 26: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations

within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been stored.

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Request for Production No. 27: Please produce all documents and materials reflecting, referring to or relating to any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been land applied.

Request for Production No. 28: Please produce all documents and materials reflecting, referring to or relating to any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been land applied.

Request for Production No. 29: Please produce all documents and materials reflecting, referring to or relating to any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been land applied.

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Request for Production No. 30: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental effects / impacts of run-off / discharge / release of

poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been land applied.

Request for Production No. 31: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been land applied.

Request for Production No. 32: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been land applied.

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Request for Production No. 33: Please produce all documents and materials reflecting, referring to or relating to any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been land applied.

Request for Production No. 34: Please produce all documents and materials reflecting, referring to or relating to any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land

or locations within the IRW on which poultry waste / poultry litter / poultry manure has been land applied.

Request for Production No. 35: Please produce all documents and materials reflecting, referring to or relating to any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been land applied.

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Request for Production No. 36: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been land applied.

Request for Production No. 37: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been land applied.

Request for Production No. 38: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations

within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been land applied.

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Request for Production No. 39: Please produce all documents and materials reflecting, referring to or relating to the use of poultry waste / poultry litter / poultry manure.

Request for Production No. 40: Please produce all documents and materials reflecting, referring to or relating to the use of poultry waste / poultry litter / poultry manure within the IRW.

Request for Production No. 41: Please produce all documents and materials reflecting, referring to or relating to the use of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

* * *

Request for Production No. 42: Please produce all documents and materials reflecting, referring to or relating to the management of poultry waste / poultry litter / poultry manure.

Request for Production No. 43: Please produce all documents and materials reflecting, referring to or relating to the management of poultry waste / poultry litter / poultry manure within the IRW.

Request for Production No. 44: Please produce all documents and materials reflecting, referring to or relating to the management of poultry waste / poultry litter / poultry

manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

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Request for Production No. 45: Please produce all documents and materials reflecting, referring to or relating to the handling of poultry waste / poultry litter / poultry manure.

Request for Production No. 46: Please produce all documents and materials reflecting, referring to or relating to the handling of poultry waste / poultry litter / poultry manure within the IRW.

Request for Production No. 47: Please produce all documents and materials reflecting, referring to or relating to the handling of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

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Request for Production No. 48: Please produce all documents and materials reflecting, referring to or relating to the storage of poultry waste / poultry litter / poultry manure.

Request for Production No. 49: Please produce all documents and materials reflecting, referring to or relating to the storage of poultry waste / poultry litter / poultry manure within the IRW.

Request for Production No. 50: Please produce all documents and materials reflecting, referring to or relating to the storage of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

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Request for Production No. 51: Please produce all documents and materials reflecting, referring to or relating to the disposal of poultry waste / poultry litter / poultry manure.

Request for Production No. 52: Please produce all documents and materials reflecting, referring to or relating to the disposal of poultry waste / poultry litter / poultry manure within the IRW.

Request for Production No. 53: Please produce all documents and materials reflecting, referring to or relating to the disposal of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

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Request for Production No. 54: Please produce all documents and materials reflecting, referring to or relating to the transport of poultry waste / poultry litter / poultry manure.

Request for Production No. 55: Please produce all documents and materials reflecting, referring to or relating to the transport of poultry waste / poultry litter / poultry manure within or from the IRW.

Request for Production No. 56: Please produce all documents and materials reflecting, referring to or relating to the transport of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within or from the IRW.

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Request for Production No. 57: Please produce all documents and materials reflecting, referring to or relating to the land application of poultry waste / poultry litter / poultry manure.

Request for Production No. 58: Please produce all documents and materials reflecting, referring to or relating to the land application of poultry waste / poultry litter / poultry manure within the IRW.

Request for Production No. 59: Please produce all documents and materials reflecting, referring to or relating to the land application of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

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Request for Production No. 60: Please produce all documents and materials reflecting, referring to or relating to the location where poultry waste / poultry litter / poultry manure (or any constituents thereof) that has run-off or discharged from land within the IRW has come to be located.

Request for Production No. 61: Please produce all documents and materials reflecting, referring to or relating to the location where poultry waste / poultry litter / poultry manure (or any constituents thereof) produced / generated by your poultry growing operations or poultry growing operations under contract with you that has run-off or discharged from land within the IRW has come to be located.

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Request for Production No. 62: Please produce all documents and materials reflecting, referring to or relating to best management practices for the handling, storage, transport, use or disposal of poultry waste / poultry litter / poultry manure.

Request for Production No. 63: Please produce all documents and materials reflecting, referring to or relating to best management practices for the handling, storage, transport, use or disposal of poultry waste / poultry litter / poultry manure within the IRW.

Request for Production No. 64: Please produce all documents and materials reflecting, referring to or relating to best management practices for the handling, storage, transport, use or disposal of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

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Request for Production No. 65: Please produce all documents and materials reflecting, referring to or relating to nutrient management practices.

Request for Production No. 66: Please produce all documents and materials reflecting, referring to or relating to nutrient management practices within the IRW.

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Request for Production No. 67: Please produce all documents and materials reflecting, referring to or relating to any actions (including but not limited to disciplinary actions) you have taken or contemplated taking against any of your poultry growers pertaining to the handling, storage, transport, use or disposal of poultry waste / poultry litter / poultry manure.

Request for Production No. 68: Please produce all documents and materials reflecting, referring to or relating to any actions (including but not limited to disciplinary actions)

you have taken or contemplated taking against any of your poultry growers pertaining to the handling, storage, transport, use or disposal of poultry waste / poultry litter / poultry manure within the IRW.

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Request for Production No. 69: Please produce all documents and materials reflecting, referring to or relating to alternative uses or methods of disposal for poultry waste / poultry litter / poultry manure.

Request for Production No. 70: Please produce all documents and materials reflecting, referring to or relating to alternative uses or methods of disposal for poultry waste / poultry litter / poultry manure within the IRW.

Request for Production No. 71: Please produce all documents and materials reflecting, referring to or relating to alternative uses or methods of disposal for poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

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Request for Production No. 72: Please produce all documents and materials reflecting, referring to or relating to correspondence or communication between you and any of your poultry growers concerning the handling, storage, transport, use or disposal of poultry waste / poultry litter / poultry manure within the IRW.

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Request for Production No. 73: Please produce all documents and materials reflecting, referring to or relating to the amount of poultry waste / poultry litter / poultry manure produced / generated at poultry growing operations within the IRW.

Request for Production No. 74: Please produce all documents and materials reflecting, referring to or relating to the amount of poultry waste / poultry litter / poultry manure produced / generated at your poultry growing operations within the IRW.

Request for Production No. 75: Please produce all documents and materials reflecting, referring to or relating to the amount of poultry waste / poultry litter / poultry manure produced / generated at poultry growing operations under contract with you within the IRW.

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Request for Production No. 76: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the design, specifications, construction, modification and / or maintenance of poultry growing houses issued by you.

Request for Production No. 77: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the design, specifications, construction, modification and / or maintenance of poultry growing houses issued by you to persons owning or operating poultry growing operations under contract with you within the IRW.

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Request for Production No. 78: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the raising of birds (including, without limitation, the feeding, the house conditions, the provision of preventative medication or vaccinations, the provision of dietary supplements, etc.) issued by you to persons owning or operating poultry growing operations under contract with you.

Request for Production No. 79: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the raising of birds (including, without limitation, the feeding, the house conditions, the provision of preventative medication or vaccinations, the provision of dietary supplements, etc.) issued by you to persons owning or operating poultry growing operations under contract with you within the IRW.

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Request for Production No. 80: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the ownership, handling, storage, management, transport and / or disposal of poultry waste / poultry litter / poultry manure issued by you to persons owning or operating poultry growing operations under contract with you.

Request for Production No. 81: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the ownership, handling, storage, management, transport and / or disposal of poultry waste / poultry litter / poultry manure issued by you to persons owning or operating poultry growing operations under contract with you within the IRW.

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Request for Production No. 82: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the ownership of birds (living and dead) issued by you to persons owning or operating poultry growing operations under contract with you.

Request for Production No. 83: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the ownership of birds (living and dead) issued by you to persons owning or operating poultry growing operations under contract with you within the IRW.

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Request for Production No. 84: Please produce all documents and materials reflecting, referring to or relating to any grower manuals, guides or hand-outs issued or provided by you to persons owning or operating poultry growing operations under contract with you.

Request for Production No. 85: Please produce all documents and materials reflecting, referring to or relating to any grower manuals, guides or hand-outs issued or provided by you to persons owning or operating poultry growing operations under contract with you within the IRW.

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Request for Production No. 86: Please produce all documents and materials reflecting, referring to or relating to any inspection reports / monitoring reports / site visit reports pertaining to poultry growing operations under contract with you within the IRW.

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Request for Production No. 87: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with the State of Arkansas (including but not limited to any of its elected officials, appointed officials, employees, departments, agencies, commissions, etc.).

Request for Production No. 88: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or

the subject matter of this lawsuit with any political subdivisions of the State of Arkansas (e.g., including but not limited to counties, cities, towns, municipalities and any of their elected officials, appointed officials, employees, departments, agencies, commissions, etc.).

Request for Production No. 89: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any university or college in the State of Arkansas (including but not limited to any of its employees or departments).

Request for Production No. 90: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any extension agents in the State of Arkansas (including but not limited to any of its employees or departments).

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Request for Production No. 91: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with the State of Oklahoma (including but not limited to any of its elected officials, appointed officials, employees, departments, agencies, commissions, etc.).

Request for Production No. 92: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any political subdivisions of the State of Oklahoma (e.g., including but not limited to counties, cities, towns, municipalities and any of their elected officials, appointed officials, employees, departments, agencies, commissions, etc.).

Request for Production No. 93: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or

the subject matter of this lawsuit with any university or college in the State of Oklahoma (including but not limited to any of its employees or departments).

Request for Production No. 94: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any extension agents in the State of Oklahoma (including but not limited to any of its employees or departments).

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Request for Production No. 95: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with the United States government (including but not limited to any of its elected officials, appointed officials, employees, departments, agencies, commissions, etc.).

Request for Production No. 96: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any Farm Bureau (including but not limited to any of its employees).

Request for Production No. 97: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any Chamber of Commerce (including but not limited to any of its employees).

Request for Production No. 98: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any poultry growers.

* * *

Request for Production No. 99: Please produce all documents and materials reflecting, referring to or relating to Poultry Partners, Inc. (including but not limited to any of its officers, employees, attorneys or members).

Request for Production No. 100: Please produce all documents and materials reflecting, referring to or relating to the Poultry Community Council (including but not limited to any of its officers, employees, attorneys or members).

Request for Production No. 101: Please produce all documents and materials reflecting, referring to or relating to Hall Estill or any of its attorneys.

Request for Production No. 102: Please produce all documents and materials reflecting, referring to or relating to BMP's, Inc. or any of its officers or employees.

* * *

Request for Production No. 103: Please produce all documents and materials reflecting, referring to or relating to any public statements, speeches, releases or communications you have made regarding this lawsuit or the subject matter of this lawsuit.

Request for Production No. 104: Please produce all documents and materials reflecting, referring to or relating to any internal statements, speeches, releases or communications you have made regarding this lawsuit or the subject matter of this lawsuit.

* * *

Request for Production No. 105: Please produce all documents and materials reflecting, referring to or relating to the nature or character of the legal relationship between you and your contract growers.

Request for Production No. 106: Please produce all documents and materials reflecting, referring to or relating to any legal disputes or lawsuits regarding the nature or character of the legal relationship between you and your contract growers.

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Request for Production No. 107: Please produce all documents and materials reflecting, referring to or relating to your net worth.

* * *

Request for Production No. 108: Please produce copies of any charts, diagrams or schematics reflecting your present and / or past corporate structure and relationship to any corporate affiliates.

Request for Production No. 109: Please produce copies of any charts, diagrams or schematics reflecting the present and / or past management or organizational structures for those portions of your business relating, directly or indirectly, to poultry growing, as well as any charts, diagrams or schematics reflecting the personnel / employees holding positions within those structures.

Request for Production No. 110: Please produce copies of any charts, diagrams or schematics reflecting the present and / or past management or organizational structures for those portions of your business relating, directly or indirectly, to environmental issues, as well as any charts, diagrams or schematics reflecting the personnel / employees holding positions within those structures.

* * *

Request for Production No. 111: Please produce all documents and materials supporting or underlying the allegations made in paragraph 3 of the Third Party Complaint [DKT. #80].

* * *

Request for Production No. 112: Please produce all documents and materials reflecting, referring to or relating to the number of birds raised in the IRW each year (since 1952) by you or poultry growers under contract with you.

Request for Production No. 113: Please produce all documents and materials reflecting, referring to or relating to the amount of poultry manure produced per bird owned by you.

Request for Production No. 114: Please produce all documents and materials reflecting, referring to or relating to the amount of poultry waste / poultry litter / poultry manure produced per year in connection with your poultry growing operations (including poultry growing operations under contract with you) in the IRW each year (since 1952).

Request for Production No. 115: Please produce all documents and materials reflecting, referring to or relating to the number of bird carcasses produced per year in connection with your poultry growing operations (including poultry growing operations under contract with you) in the IRW each year (since 1952).

Request for Production No. 116: Please produce all documents and materials reflecting, referring to or relating to the disposal of bird carcasses produced in connection with your poultry growing operations (including poultry growing operations under contract with you) in the IRW each year (since 1952).

* * *

Request for Production No. 117: Please produce all documents and materials reflecting, referring to or relating to the present environmental quality, character or condition of the lakes, rivers, streams and creeks located in the Oklahoma portion of the IRW.

Request for Production No. 118: Please produce all documents and materials reflecting, referring to or relating to the historical environmental quality, character or condition of the lakes, rivers, streams and creeks located in the Oklahoma portion of the IRW.

* * *

Request for Production No. 119: Please produce all documents and materials reflecting, referring to or relating to any advertising or public relations campaigns paid for you, directly or indirectly, in whole or in part, that address the environmental impact of poultry growing or poultry production.

* * *

Request for Production No. 120: Please produce all documents and materials reflecting, referring to or relating to any testing or analyses performed by or on behalf of you on soils or lands located within the IRW.

Request for Production No. 121: Please produce all documents and materials reflecting, referring to or relating to any testing or analyses performed by or on behalf of you on surface waters located within the IRW.

Request for Production No. 122: Please produce all documents and materials reflecting, referring to or relating to any testing or analyses performed by or on behalf of you on ground waters located within the IRW.

Request for Production No. 123: Please produce all documents and materials reflecting, referring to or relating to any testing or analyses performed by or on behalf of you on edge-of-field run-off from lands located within the IRW.

* * *

Request for Production No. 124: Please produce all documents and materials reflecting, referring to or relating to any citations, tickets, fines, penalties or warnings issued to you or poultry growers under contract with you that pertain to actual or alleged run-off or discharge of poultry waste / poultry litter / poultry manure.

* * *

Request for Production No. 125: Please produce all documents and materials reflecting, referring to or relating to the destruction of any documents and materials that would have been responsive to any of the above requests for production but due to their destruction are no longer in existence.

Respectfully Submitted,

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July 10, 2006

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of July, 2006, I electronically transmitted the attached document to the following:

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I hereby certify that on this 10th day of July, 2006, I served the foregoing document by U.S. Postal Service on the following:

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