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

STATE OF OKLAHOMA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:05-cv-00329-GKF-SAJ
	)	
TYSON FOODS, INC., *et al.*,	)	
	)	
Defendants.	)	

AMENDED NOTICE OF DEPOSITION OF CARGILL, INC.

Please take notice that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the deposition of Cargill, Inc. (hereinafter "Cargill"), by and through its duly designated representative(s), shall be taken by the State at 9:00 o'clock A.M. on August 27, 2007, at the offices of Theresa Noble Hill, Rhodes, Hieronymus, Jones, Tucker & Gable, 100 W. 5th St., Suite 400, Tulsa, Ok 74121, before a qualified court reporter and videographer, such examination to continue by adjournment, if necessary, until the same is completed on those matters set forth in the attached Exhibit "A":

Respectfully Submitted,

W.A. Drew Edmondson OBA # 2628
Attorney General
Kelly H. Burch OBA #17067
J. Trevor Hammons OBA #20234
Tina Lynn Izadi OBA #17978
Assistant Attorneys General
State of Oklahoma
313 N.E. 21st St.
Oklahoma City, OK 73105
(405) 521-3921

M. David Riggs OBA #7583
Joseph P. Lennart OBA #5371
Richard T. Garren OBA #3253
Douglas A. Wilson OBA #13128
Sharon K. Weaver OBA #19010

EXHIBIT
2

Robert A. Nance OBA #6581
D. Sharon Gentry OBA #15641
Riggs, Abney, Neal, Turpen,
Orbison & Lewis
502 West Sixth Street
Tulsa, OK 74119
(918) 587-3161

James Randall Miller, OBA #6214
Louis Werner Bullock, OBA #1305
Miller Keffer & Bullock
222 S. Kenosha
Tulsa, Ok 74120-2421
(918) 743-4460

David P. Page, OBA #6852
Bell Legal Group
222 S. Kenosha
Tulsa, OK 74120
(918) 398-6800

Frederick C. Baker
(admitted *pro hac vice*)
Lee M. Heath
(admitted *pro hac vice)*
Elizabeth C. Ward
(admitted *pro hac vice*)
Elizabeth Claire Xidis
(admitted *pro hac vice*)
Motley Rice, LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465
(843) 216-9280

William H. Narwold
(admitted *pro hac vice*)
Ingrid L. Moll
(admitted *pro hac vice)*
Motley Rice, LLC
20 Church Street, 17th Floor
Hartford, CT 06103
(860) 882-1676

Attorneys for the State of Oklahoma

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of July, 2007, I electronically transmitted the above and foregoing pleading to the Clerk of the Court using the ECF System for filing and a transmittal of a Notice of Electronic Filing to the following ECF registrants:

Frederick C Baker fbaker@motleyrice.com, mcarr@motleyrice.com; fhmorgan@motleyrice.com

Michael R. Bond michael.bond@kutakrock.com, amy.smith@kutakrock.com

Vicki Bronson vbronson@cwlaw.com, lphillips@cwlaw.com

Paula M Buchwald pbuchwald@ryanwhaley.com

Louis Werner Bullock LBULLOCK@MKBLAW.NET, NHODGE@MKBLAW.NET; BDEJONG@MKBLAW.NET

Gary S Chilton gchilton@hcdattorneys.com

W A Drew Edmondson fc_docket@oag.state.ok.us, drew_edmondson@oag.state.ok.us; suzy_thrash@oag.state.ok.us.

Delmar R Ehrich dehrich@faegre.com, etriplett@faegre.com; ; qsperrazza@faegre.com

John R Elrod jelrod@cwlaw.com, vmorgan@cwlaw.com

Bruce Wayne Freeman bfreeman@cwlaw.com, lclark@cwlaw.com

D. Richard Funk rfunk@cwlaw.com

Richard T Garren rgarren@riggsabney.com, dellis@riggsabney.com

Dorothy Sharon Gentry sgentry@riggsabney.com, jzielinski@riggsabney.com

Robert W George robert.george@kutakrock.com, sue.arens@kutakrock.com; amy.smith@kutakrock.com

James Martin Graves jgraves@bassettlawfirm.com

Tgrever@lathropgage.com

Jennifer Stockton Griffin jgriffin@lathropgage.com

John Trevor Hammons thammons@oag.state.ok.us, Trevor_Hammons@oag.state.ok.us; Jean! _Burnett@oag.state.ok.us

Lee M Heath ! lheath@motleyrice.com

Theresa Noble Hill thillcourts@rhodesokla.com, mnave@rhodesokla.com

Philip D Hixon phixon@mcdaniel-lawfirm.com

Mark D Hopson mhopson@sidley.com, joraker@sidley.com

Kelly S Hunter Burch fc.docket@oag.state.ok.us, kelly_burch@oag.state.ok.us; jean_burnett@oag.state.ok.us

Tina Lynn Izadi; tina_izadi@oag.state.ok.us

Stephen L Jantzen sjantzen@ryanwhaley.com, mantene@ryanwhaley.com; loelke@ryanwhaley.com

Bruce Jones bjones@faegre.com, dybarra@faegre.com; jintermill@faegre.com; cdolan@faegre.com

Jay Thomas Jorgensen jjorgensen@sidley.com

Raymond Thomas Lay rtl@kiralaw.com, dianna@kiralaw.com

Krisann C. Kleibacker Lee; kklee@faegre.com

Nicole Marie Longwell Nlongwell@@mcdaniel-lawfirm.com

Archer Scott McDaniel smcdaniel@mcdaniel-lawfirm.com

James Randall Miller rmiller@mkblaw.net, smilata@mkblaw.net; clagrone@mkblaw.net

Charles Livingston Moulton Charles.Moulton@arkansasag.gov, Kendra.Jones@arkansasag.gov

Ingrid Moll; imoll@motleyrice.com

Robert Allen Nance rnance@riggsabney.com, jzielinski@riggsabney.com

William H Narwold bnarwold@motleyrice.com

George W Owens gwo@owenslawfirmpc.com, ka@owenslawfirmpc.com

David Phillip Page dpage@edbelllaw.com, smilata@edbelllaw.com

Robert Paul Redemann rredemann@pmrlaw.net, scouch@pmrlaw.net

Melvin David Riggs driggs@riggsabney.com, pmurta@riggsabney.com

Randall Eugene Rose ! rer@owenslawfirmpc.com, ka@owenslawfirmpc.com

Robert E Sanders rsanders@youngwilliams.com,

David Charles Senger dsenger@pmrlaw.net, scouch@pmrlaw.net; ntorres@pmrlaw.net

Colin Hampton Tucker chtucker@rhodesokla.com, scottom@rhodesokla.com

John H Tucker jtuckercourts@rhodesokla.com, lwhite@rhodesokla.com

Elizabeth C Ward lward@motleyrice.com

Sharon K Weaver sweaver@riggsabney.com, lpearson@riggsabney.com

Timothy K Webster twebster@sidley.com, jwedeking@sidley.com

Gary V Weeks !

Terry Wayen West terry@thewestlawfirm.com,

Edwin Stephen Williams steve.williams@youngwilliams.com

Douglas Allen Wilson Doug_Wilson@riggsabney.com, pmurta@riggsabney.com

jwisley@cwlaw.com, jknight@cwlaw.com

Elizabeth Claire Xidis cxidis@motleyrice.com

Lawrence W Zeringue lzeringue@pmrlaw.net, scouch@pmrlaw.net

Also on this 16th day of July, 2007 I mailed a copy of the above and foregoing pleading to:

Robin S Conrad
National Chamber Litigation Center
1615 H ST NW

WASHINGTON, DC 20062

Thomas C Green
Sidley Austin Brown & Wood LLP
1501 K ST NW
WASHINGTON, DC 20005

Cary Silverman
Victor E Schwartz
Shook Hardy & Bacon LLP (Washington DC)
600 14TH ST NW STE 800
WASHINGTON, DC 20005-2004

C Miles Tolbert
Secretary of the Environment
State of Oklahoma
3800 NORTH CLASSEN
OKLAHOMA CITY, OK 73118

Paul E Thompson , Jr
Bassett Law Firm
P O Box 3618
Fayetteville, AR 72702

Thomas James McGeady
Logan & Lowry
P. O. Box 558
Vinita, Ok 74301

Richard T. Garren

RULE 30(B)(6) Notice – EXHIBIT "A"

I. Definitions

1. "You" or "your" means Cargill, Inc. and includes any parent, holding company, sister corporation, subsidiary, partnership, joint venture, association, owned by or which Cargill, Inc. has an interest.

2. "Your poultry growing operations" means any poultry growing facility where birds owned by you are being produced or grown.

3. "The period of inquiry" shall be from the date you commenced any poultry growing operations located within the boundaries of the IRW to the date of your testimony unless stated otherwise.

4. As used herein "poultry waste" means poultry excrement, bedding material, feed wastes and any other waste associated with the confinement of poultry in a grow house which is removed periodically from the grow house and used or disposed of elsewhere, also commonly referred to by the Poultry Integrator Defendants as poultry litter.

II. Areas of Inquiry

1. The Contracts, its terms and conditions, between you and poultry growers located in the Illinois River Watershed ("IRW"), past and present, including the contracts themselves and any amendments or changes to the contracts considered, proposed or adopted.

2. The relationship between you and persons / entities owning or operating poultry growing operations under contract with you within the IRW.

3. The ingredients and composition of feed formulas, past and present, used at your poultry growing operations within the IRW.

4. The additives or supplements to feed formulas, past and present, used at your poultry growing operations within the IRW.

5. The hormones added to feed formulas, past and present, used at your poultry growing operations within the IRW.

6. The number, size and location of poultry houses / barns, past and present, at your poultry growing operations within the IRW.

7. The number of and kind of birds raised in the IRW each year by you or poultry growers under contract with you.

8. The amount of feed used at each and all of your poultry growing operations within the IRW on an annual basis.

9. The identity of the composition and constituents of poultry waste generally, and of poultry waste generated at your poultry growing operations within the IRW specifically, past and present, as well as any studies, analyses, testing, investigations or research of the composition or constituents of poultry waste.

10. The amount of poultry waste generated during the lifetime of an individual bird specified by bird types owned by you within the IRW.

11. The amount of poultry waste generated by each and all of your poultry growing operations within the IRW on an annual basis.

12. Industry practice and your contract poultry growers practice regarding handling, storage, and spreading on land of poultry waste.

13. The amount of and specific locations, past and present, where poultry waste generated by each and all of your poultry growing operations has been spread on land within the IRW.

14. Knowledge or awareness of the run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations on which poultry waste generated by your poultry growing operations within the IRW has been stored, spread on or disposed of.

15. Knowledge or awareness of the run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations on which poultry waste has been stored, spread or upon or disposed of.

16. The environmental and human health effects / impacts of run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations within the IRW on which poultry waste generated by your poultry growing operations has been stored, spread on or disposed of.

17. The environmental and human health effects / impacts of run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations on which poultry waste has been stored, spread on or disposed of.

18. The efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental and human health effects / impacts of run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations within the

IRW on which poultry waste generated by your poultry growing operations has been stored, spread on or disposed of.

19. The efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental and human health effects / impacts of run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations on which poultry waste has been stored, spread on or disposed of.

20. Practices, policies and procedures, past and present, pertaining to the management, handling, storage, transportation, sale, trading, spreading on land, disposition, and disposal of poultry waste generated by your poultry growing operations in the IRW.

21. The location(s) where poultry waste (or any constituents thereof) generated by your poultry growing operations that has run-off / been discharged / been released from land within the IRW has come to be located.

22. Best management practices for the handling, storage, transport, use or disposal of poultry waste generally and in the IRW specifically and the effectiveness of best management practices in preventing runoff / discharge / or release of poultry waste or the constituents of those into the waters of the IRW.

23. Actions (including but not limited to disciplinary actions) you have taken or contemplated taking against any of your poultry growers within the IRW pertaining to the handling, storage, transport, use, spreading on land, or disposal of poultry waste.

24. Alternative methods for the use or disposal of poultry waste.

25. The management, supervision, inspection and monitoring by you of persons / entities owning or operating poultry growing operations under contract with you.

26. Communications you have had regarding this lawsuit or the subject matter of this lawsuit with the State of Oklahoma, any political subdivision of the State of Oklahoma, the State of Arkansas, any political subdivision of the State of Arkansas, and the United States (including but not limited to any of their respective elected officials, appointed officials, employees, departments, agencies, commissions, etc.).

27. Communications you have had regarding this lawsuit or the subject matter of this lawsuit with any university or college in the State of Oklahoma or the State of Arkansas (including but not limited to any of its officers, employees or departments).

28. Communications you have had regarding this lawsuit or the subject matter of this lawsuit with the Farm Bureau, the Poultry Community Council, Poultry Partners, BMP's Inc., the Poultry Federation, the United States Poultry and Egg Association, the National Chicken Council and the National Turkey Federation (including but not limited to any of their respective officers, employees or agents).

29. Participation in and contributions and payments (financial or otherwise) to the Poultry Community Council, Poultry Partners, BMP's Inc., the Poultry Federation, the United States Poultry and Egg Association, the National Chicken Council and the National Turkey Federation (including but not limited to any of their respective officers, employees or agents).

30. Communications you have had regarding this lawsuit or the subject matter of this lawsuit with any poultry growers in the IRW.

31. Manner and methods used to modify any procedures used by you or those contracted with you regarding the handling, storage and use of poultry waste of as a result of the settlement reached in the case of *City of Tulsa vs. Tyson Foods, Inc., et al. USDC for the Northern District of Oklahoma; case no. CV 0900 EA(C).*

32. The allegations made in paragraph 3 of the Third Party Complaint [DKT. #80].

33. Advertising or public relations campaigns to which you have contributed or for which you have paid, directly or indirectly, in whole or in part, that address the environmental impact of poultry growing or poultry waste in the IRW.

34. Differences in the method, manner, direction or management of your poultry growing operations in Oklahoma compared to Arkansas within the IRW.

35. The facts, reason and basis supporting or relied on by you for responses made to the State's Requests for Admissions served on or about April 20, 2007.

36. Your corporate organizational structure including without limitation:

a. identification of officers, directors and shareholders;

b. any relationship with any parent, holding company or subsidiary;

c. any relationship in or to any LLC, limited partnership, joint venture or association.

d. Identification of any other areas of corporate business or operation conducted by you in addition to your growing, processing and marketing of poultry and poultry products.

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

STATE OF OKLAHOMA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 4:05-cv-00329-GKF-SAJ
	)	
TYSON FOODS, INC., *et al.*,	)	
	)	
Defendants.	)	

AMENDED NOTICE OF DEPOSITION OF
CARGILL TURKEY PRODUCTION, LLC

Please take notice that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, the deposition of Cargill Turkey Production, LLC (hereinafter "Cargill Turkey"), by and through its duly designated representative(s), shall be taken by the State at 9:00 o'clock A.M. on August 1, 2007, at the offices of Theresa Noble Hill, Rhodes, Hieronymus, Jones, Tucker & Gable, 100 W. 5th St., Suite 400, Tulsa, Ok, before a qualified court reporter and videographer, such examination to continue by adjournment, if necessary, until the same is completed on those matters set forth in the attached Exhibit "A":

Respectfully Submitted,

W.A. Drew Edmondson OBA # 2628
Attorney General
Kelly H. Burch OBA #17067
J. Trevor Hammons OBA #20234
Tina Lynn Izadi OBA #17978
Assistant Attorneys General
State of Oklahoma
313 N.E. 21st St.
Oklahoma City, OK 73105
(405) 521-3921

M. David Riggs OBA #7583
Joseph P. Lennart OBA #5371

Richard T. Garren OBA #3253
Douglas A. Wilson OBA #13128
Sharon K. Weaver OBA #19010
Robert A. Nance OBA #6581
D. Sharon Gentry OBA #15641
Riggs, Abney, Neal, Turpen,
Orbison & Lewis
502 West Sixth Street
Tulsa, OK 74119
(918) 587-3161

James Randall Miller, OBA #6214
Louis Werner Bullock, OBA #1305
Miller Keffer & Bullock
222 S. Kenosha
Tulsa, Ok 74120-2421
(918) 743-4460

David P. Page, OBA #6852
Bell Legal Group
222 S. Kenosha
Tulsa, OK 74120
(918) 398-6800

Frederick C. Baker
(admitted *pro hac vice*)
Lee M. Heath
(admitted *pro hac vice)*
Elizabeth C. Ward
(admitted *pro hac vice*)
Elizabeth Claire Xidis
(admitted *pro hac vice*)
Motley Rice, LLC
28 Bridgeside Boulevard
Mount Pleasant, SC 29465
(843) 216-9280

William H. Narwold
(admitted *pro hac vice*)
Ingrid L. Moll
(admitted *pro hac vice)*
Motley Rice, LLC
20 Church Street, 17th Floor
Hartford, CT 06103
(860) 882-1676

Attorneys for the State of Oklahoma

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of July, 2007, I electronically transmitted the above and foregoing pleading to the Clerk of the Court using the ECF System for filing and a transmittal of a Notice of Electronic Filing to the following ECF registrants:

Frederick C Baker fbaker@motleyrice.com, mcarr@motleyrice.com; fhmorgan@motleyrice.com

Michael R. Bond michael.bond@kutakrock.com, amy.smith@kutakrock.com

Vicki Bronson vbronson@cwlaw.com, lphillips@cwlaw.com

Paula M Buchwald pbuchwald@ryanwhaley.com

Louis Werner Bullock LBULLOCK@MKBLAW.NET, NHODGE@MKBLAW.NET; BDEJONG@MKBLAW.NET

Gary S Chilton gchilton@hcdattorneys.com

W A Drew Edmondson fc_docket@oag.state.ok.us, drew_edmondson@oag.state.ok.us; suzy_thrash@oag.state.ok.us.

Delmar R Ehrich dehrich@faegre.com, etriplett@faegre.com; ; qsperrazza@faegre.com

John R Elrod jelrod@cwlaw.com, vmorgan@cwlaw.com

Bruce Wayne Freeman bfreeman@cwlaw.com, lclark@cwlaw.com

D. Richard Funk rfunk@cwlaw.com

Richard T Garren rgarren@riggsabney.com, dellis@riggsabney.com

Dorothy Sharon Gentry sgentry@riggsabney.com, jzielinski@riggsabney.com

Robert W George robert.george@kutakrock.com, sue.arens@kutakrock.com; amy.smith@kutakrock.com

James Martin Graves jgraves@bassettlawfirm.com

Tgrever@lathropgage.com

Jennifer Stockton Griffin jgriffin@lathropgage.com

John Trevor Hammons thammons@oag.state.ok.us, Trevor_Hammons@oag.state.ok.us; Jean! _Burnett@oag.state.ok.us

Lee M Heath ! lheath@motleyrice.com

Theresa Noble Hill thillcourts@rhodesokla.com, mnave@rhodesokla.com

Philip D Hixon phixon@mcdaniel-lawfirm.com

Mark D Hopson mhopson@sidley.com, joraker@sidley.com

Kelly S Hunter Burch fc.docket@oag.state.ok.us, kelly_burch@oag.state.ok.us; jean_burnett@oag.state.ok.us

Tina Lynn Izadi; tina_izadi@oag.state.ok.us

Stephen L Jantzen sjantzen@ryanwhaley.com, mantene@ryanwhaley.com; loelke@ryanwhaley.com

Bruce Jones bjones@faegre.com, dybarra@faegre.com; jintermill@faegre.com; cdolan@faegre.com

Jay Thomas Jorgensen jjorgensen@sidley.com

Raymond Thomas Lay rtl@kiralaw.com, dianna@kiralaw.com

Krisann C. Kleibacker Lee; kklee@faegre.com

Nicole Marie Longwell Nlongwell@@mcdaniel-lawfirm.com

Archer Scott McDaniel smcdaniel@mcdaniel-lawfirm.com

James Randall Miller rmiller@mkblaw.net, smilata@mkblaw.net; clagrone@mkblaw.net

Charles Livingston Moulton Charles.Moulton@arkansasag.gov, Kendra.Jones@arkansasag.gov

Ingrid Moll; imoll@motleyrice.com

Robert Allen Nance rnance@riggsabney.com, jzielinski@riggsabney.com

William H Narwold bnarwold@motleyrice.com

George W Owens gwo@owenslawfirmpc.com, ka@owenslawfirmpc.com

David Phillip Page dpage@edbelllaw.com, smilata@edbelllaw.com

Robert Paul Redemann rredemann@pmrlaw.net, scouch@pmrlaw.net

Melvin David Riggs driggs@riggsabney.com, pmurta@riggsabney.com

Randall Eugene Rose ! rer@owenslawfirmpc.com, ka@owenslawfirmpc.com

Robert E Sanders rsanders@youngwilliams.com,

David Charles Senger dsenger@pmrlaw.net, scouch@pmrlaw.net; ntorres@pmrlaw.net

Colin Hampton Tucker chtucker@rhodesokla.com, scottom@rhodesokla.com

John H Tucker jtuckercourts@rhodesokla.com, lwhite@rhodesokla.com

Elizabeth C Ward lward@motleyrice.com

Sharon K Weaver sweaver@riggsabney.com, lpearson@riggsabney.com

Timothy K Webster twebster@sidley.com, jwedeking@sidley.com

Gary V Weeks !

Terry Wayen West terry@thewestlawfirm.com,

Edwin Stephen Williams steve.williams@youngwilliams.com

Douglas Allen Wilson Doug_Wilson@riggsabney.com, pmurta@riggsabney.com

jwisley@cwlaw.com, jknight@cwlaw.com

Elizabeth Claire Xidis cxidis@motleyrice.com

Lawrence W Zeringue lzeringue@pmrlaw.net, scouch@pmrlaw.net

Also on this 16th day of July, 2007 I mailed a copy of the above and foregoing pleading to:

Robin S Conrad
National Chamber Litigation Center
1615 H ST NW
WASHINGTON, DC 20062

Thomas C Green
Sidley Austin Brown & Wood LLP
1501 K ST NW
WASHINGTON, DC 20005

Cary Silverman
Victor E Schwartz
Shook Hardy & Bacon LLP (Washington DC)
600 14TH ST NW STE 800
WASHINGTON, DC 20005-2004

C Miles Tolbert
Secretary of the Environment
State of Oklahoma
3800 NORTH CLASSEN
OKLAHOMA CITY, OK 73118

Paul E Thompson , Jr
Bassett Law Firm
P O Box 3618
Fayetteville, AR 72702

Thomas James McGeady
Logan & Lowry
P. O. Box 558
Vinita, Ok 74301

Richard T. Garren

RULE 30(B)(6) Notice – EXHIBIT "A"

I. Definitions

1. "You" or "your" means Cargill Turkey Production, LLC and includes any parent, holding company, sister corporation, subsidiary, partnership, joint venture, association, owned by or which Cargill Turkey Production, LLC has an interest.

2. "Your poultry growing operations" means any poultry growing facility where birds owned by you are being produced or grown.

3. "The period of inquiry" shall be from the date you commenced any poultry growing operations located within the boundaries of the IRW to the date of your testimony unless stated otherwise.

4. As used herein "poultry waste" means poultry excrement, bedding material, feed wastes and any other waste associated with the confinement of poultry in a grow house which is removed periodically from the grow house and used or disposed of elsewhere, also commonly referred to by the Poultry Integrator Defendants as poultry litter.

II. Areas of Inquiry

1. The Contracts, its terms and conditions, between you and poultry growers located in the Illinois River Watershed ("IRW"), past and present, including the contracts themselves and any amendments or changes to the contracts considered, proposed or adopted.

2. The relationship between you and persons / entities owning or operating poultry growing operations under contract with you within the IRW.

3. The ingredients and composition of feed formulas, past and present, used at your poultry growing operations within the IRW.

4. The additives or supplements to feed formulas, past and present, used at your poultry growing operations within the IRW.

5. The hormones added to feed formulas, past and present, used at your poultry growing operations within the IRW.

6. The number, size and location of poultry houses / barns, past and present, at your poultry growing operations within the IRW.

7. The number of and kind of birds raised in the IRW each year by you or poultry growers under contract with you.

8. The amount of feed used at each and all of your poultry growing operations within the IRW on an annual basis.

9. The identity of the composition and constituents of poultry waste generally, and of poultry waste generated at your poultry growing operations within the IRW specifically, past and present, as well as any studies, analyses, testing, investigations or research of the composition or constituents of poultry waste.

10. The amount of poultry waste generated during the lifetime of an individual bird specified by bird types owned by you within the IRW.

11. The amount of poultry waste generated by each and all of your poultry growing operations within the IRW on an annual basis.

12. Industry practice and your contract poultry growers practice regarding handling, storage, and spreading on land of poultry waste.

13. The amount of and specific locations, past and present, where poultry waste generated by each and all of your poultry growing operations has been spread on land within the IRW.

14. Knowledge or awareness of the run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations on which poultry waste generated by your poultry growing operations within the IRW has been stored, spread on or disposed of.

15. Knowledge or awareness of the run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations on which poultry waste has been stored, spread or upon or disposed of.

16. The environmental and human health effects / impacts of run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations within the IRW on which poultry waste generated by your poultry growing operations has been stored, spread on or disposed of.

17. The environmental and human health effects / impacts of run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations on which poultry waste has been stored, spread on or disposed of.

18. The efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental and human health effects / impacts of run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations within the

IRW on which poultry waste generated by your poultry growing operations has been stored, spread on or disposed of.

19. The efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental and human health effects / impacts of run-off / discharge / release of poultry waste (or any constituents thereof) from land or locations on which poultry waste has been stored, spread on or disposed of.

20. Practices, policies and procedures, past and present, pertaining to the management, handling, storage, transportation, sale, trading, spreading on land, disposition, and disposal of poultry waste generated by your poultry growing operations in the IRW.

21. The location(s) where poultry waste (or any constituents thereof) generated by your poultry growing operations that has run-off / been discharged / been released from land within the IRW has come to be located.

22. Best management practices for the handling, storage, transport, use or disposal of poultry waste generally and in the IRW specifically and the effectiveness of best management practices in preventing runoff / discharge / or release of poultry waste or the constituents of those into the waters of the IRW.

23. Actions (including but not limited to disciplinary actions) you have taken or contemplated taking against any of your poultry growers within the IRW pertaining to the handling, storage, transport, use, spreading on land, or disposal of poultry waste.

24. Alternative methods for the use or disposal of poultry waste.

25. The management, supervision, inspection and monitoring by you of persons / entities owning or operating poultry growing operations under contract with you.

26. Communications you have had regarding this lawsuit or the subject matter of this lawsuit with the State of Oklahoma, any political subdivision of the State of Oklahoma, the State of Arkansas, any political subdivision of the State of Arkansas, and the United States (including but not limited to any of their respective elected officials, appointed officials, employees, departments, agencies, commissions, etc.).

27. Communications you have had regarding this lawsuit or the subject matter of this lawsuit with any university or college in the State of Oklahoma or the State of Arkansas (including but not limited to any of its officers, employees or departments).

28. Communications you have had regarding this lawsuit or the subject matter of this lawsuit with the Farm Bureau, the Poultry Community Council, Poultry Partners, BMP's Inc., the Poultry Federation, the United States Poultry and Egg Association, the National Chicken Council and the National Turkey Federation (including but not limited to any of their respective officers, employees or agents).

29. Participation in and contributions and payments (financial or otherwise) to the Poultry Community Council, Poultry Partners, BMP's Inc., the Poultry Federation, the United States Poultry and Egg Association, the National Chicken Council and the National Turkey Federation (including but not limited to any of their respective officers, employees or agents).

30. Communications you have had regarding this lawsuit or the subject matter of this lawsuit with any poultry growers in the IRW.

31. Manner and methods used to modify any procedures used by you or those contracted with you regarding the handling, storage and use of poultry waste of as a result of the settlement reached in the case of *City of Tulsa vs. Tyson Foods, Inc., et al. USDC for the Northern District of Oklahoma; case no. CV 0900 EA(C).*

32. The allegations made in paragraph 3 of the Third Party Complaint [DKT. #80].

33. Advertising or public relations campaigns to which you have contributed or for which you have paid, directly or indirectly, in whole or in part, that address the environmental impact of poultry growing or poultry waste in the IRW.

34. Differences in the method, manner, direction or management of your poultry growing operations in Oklahoma compared to Arkansas within the IRW.

35. The facts, reason and basis supporting or relied on by you for responses made to the State's Requests for Admissions served on or about April 20, 2007.

36. Your corporate organizational structure including without limitation:

a. identification of officers, directors and shareholders;

b. any relationship with any parent, holding company or subsidiary;

c. any relationship in or to any LLC, limited partnership, joint venture or association.

d. Identification of any other areas of corporate business or operation conducted by you in addition to your growing, processing and marketing of poultry and poultry products.