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Reply to: John H. Tucker
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March 20, 2008

VIA EMAIL ONLY

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Re: State of Oklahoma v. Tyson, et al.
Our File No.: 1790-2

Dear Counsel:

This letter follows-up on the 30(b)(6) notices served by Plaintiffs on the Cargill Defendants. The Court stayed these depositions until conclusion of the hearing on Plaintiffs' motion for preliminary injunction ("PI"). While we have had no contact from Plaintiffs regarding the scheduling of these depositions, if it remains Plaintiffs' desire to pursue these depositions, please contact me at your earliest convenience regarding the two matters discussed below.

First, Plaintiffs served the Cargill Defendants with three sets of 30(b)(6) notices. These notices were served on July 13, 2007; December 21, 2007 and January 18, 2008. Although some topics were duplicated among the notices, other topics were not. Please advise us as soon as possible which set of notices and/or topics Plaintiffs wish to pursue.

Second, the Cargill Defendants have identified at least two designees who will respond to the topics noticed by Plaintiffs. The Cargill Defendants are prepared to make these designees available for deposition as follows:

EXHIBIT
tabbies
"1"

	Date	**Location**
First Designee	Either April 3rd or 4th	Tulsa, OK
Second Designee	Either April 10th or 11th	Wichita, KS

We will advise you of the specific topics to which each designee will respond after you identify the particular notices upon which you will proceed.

As these dates are fast-approaching, we ask that you respond to this letter as soon as possible. We cannot assure that our designees will be able to hold these dates open if we do not hear from you by close of business Tuesday, March 25th.

Very truly yours,

John H. Tucker

JHT:law