RIGGS, ABNEY, NEAL, TURPEN, ORBISON & LEWIS
A PROFESSIONAL CORPORATION
ATTORNEYS AND COUNSELORS AT LAW
FRISCO BUILDING
502 WEST SIXTH STREET
TULSA, OKLAHOMA 74119-1010
(918) 587-3161
Fax (918) 583-1549
rgarren@riggsabney.com

JEANETTE AGRAFOJO-LEVY
GREGORY W. ALBERTY
REBECCA V. AMENT
JACK R. ANDERSON
THOMAS M. ASKEW
RYAN J. ASSINK
VADEN F. BALES
LISA K. BICKLE
DONALD M. BINGHAM
WILLIAM A. BOWLES
KELLY L. BRATCHER
PETER W. BROLICK
STACIE BRYZA
SCOTT W. BYRD
JILL L. CHASE
DERRICK D. CORNEJO
STEPHEN L. CORTES
DONNA MARIE DE SIMONE
ROBERT P. DEAN
GLENNA S. DORRIS
JANET S. DUMONT
IRA L. EDWARDS, JR.
GEORGE M. EMERSON
STEPHANIE A. FLING
RICHARD A. GANN
BART T. GARBUTT
RICHARD T. GARREN
D. SHARON GENTRY
STEPHEN E. HALE
MELVIN C. HALL
SHARON E. HAMM
ZACHERY R. HARGIS
CHRISTOPHER S. HEROUX
JERRI L. HILL
HOLLY M. HILLERMAN
ERIK S. HOUGHTON
ROBERT E. HOWARD
WM. GREGORY JAMES
STEVEN JANISZEWSKI
KIEMONN L. JONES
SARAH G. KENY
SCOTT P. KIRTLEY
KRISTOPHER E. KOEPSEL
TERRY D. KORDELISKI, II
G. DIANE LEE
JOSEPH P. LENNART
TYLER D. LEONARD
C. S. LEWIS, III
MARY JEAN LITTLE
LORI T. LOVOI-NIEVES
JOHN D. LUTON
BRENDAN J. MAGEE
JANET G. MALLOW
JOHN ROSS MALOY
MATT D. MATHESON
RAYMOND A. MELTON
J. PATRICK MENSCHING, JR.
RICHARD A. MILOREN
J. LYON MOREHEAD
JANICE LOGAN MORROW
ROBERT A. NANCE
GARY L. NEAL
MARK L. NELMS
MARGARET A. NUNNERY
JAMES C. ORBISON
CHERYL A. PETERSON
JAMES R. POLAN
RICHARD P. POORMON
VICTORIA L. RACKLEY
FRED RAHAL, JR.
LISA R. RIGGS
M. DAVID RIGGS
STEPHEN B. RILEY
RANDALL A. RINQUEST
MARY J. ROUNDS
WILLIAM C. SEARCY
KRISTEN E. SHILLINGTON
ROBERT P. SKEITH
KENNETH M. SMITH
SCOTT D. SMITH
BETTY J. SOMMARS
KIMBERLY V. SPARKS
BEVERLY A. STEWART
STEPHANIE L. THEBAN
DAVID H. THOMAS
ELLEN M. THOMAS
HARLEY W. THOMAS
REX W. THOMPSON
CHERYL A. TOMAN
SONJA M. TREI
MICHAEL C. TURPEN
LINDA VAN ARKEL-GREUBEL
KAREN CARDEN WALSH
SHARON K. WEAVER
JOSEPH R. WELLS
BRIAN S. WILKERSON
DOUGLAS A. WILSON
LUCAS A. WIRTH
JERRY L. WITT
COURTNEY M. WOLIN
MICHAEL P. WOMACK
GARY W. WOOD
ROBERT V. WREN
TRACY S. ZAHL

Of Counsel
Benjamin P. Abney
E. Bryan Henson
David P. Page
Peter J. Regan

March 24, 2008

John H. Tucker
Theresa Noble Hill
Rhodes, Hieronymus, Jones, Tucker & Gable
100 W. 5th St., Suite 400
Tulsa, Ok 74121

Re: *The State of Oklahoma vs. Tyson Foods, Inc., et al.*
USDC Northern District of Oklahoma Case No. 05-CV-329

Dear Counselors:

Please find enclosed Second Amended Notices of Deposition of Cargill, Inc., and Cargill Production Turkey, LLC for your records. Should you have any questions, please do not hesitate to contact me.

Very truly yours,

Richard T. Garren
FOR THE FIRM

RTG/dpe
Enclosures

EXHIBIT
tabbies
"2"

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.	)	

SECOND AMENDED
NOTICE OF DEPOSITION OF CARGILL TURKEY PRODUCTION, LLC
(Rule 30(b)(6) of the Federal Rules of Civil Procedure)

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 "CTP"), by and through its duly designated representative(s), shall be taken by the State at 9:00 o'clock A.M. on **April 29, 2008** for inquiries set forth on Exhibit "A" attached hereto and at the same time on **April 30, 2008** for inquiries set forth on Exhibit "B" attached hereto, all at the offices of 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 Exhibits "A" & "B":

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
Daniel P. Lennington OBA #21577
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
David P. Page OBA #6852
RIGGS, ABNEY, NEAL, TURPEN,
ORBISON & LEWIS
502 West Sixth Street
Tulsa, OK 74119
(918) 587-3161

Louis W. Bullock OBA #1305
Robert M. Blakemore OBA 18656
BULLOCK, BULLOCK & BLAKEMORE
110 West Seventh Street Suite 707
Tulsa OK 74119
(918) 584-2001

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

Jonathan D. Orent
(admitted *pro hac vice)*
Michael G. Rousseau
(admitted *pro hac vice)*

Fidelma L. Fitzpatrick
(admitted *pro hac vice)*
MOTLEY RICE, LLC
321 South Main Street
Providence, RI 02940
(401) 457-7700

Attorneys for the State of Oklahoma

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of March, 2008, I electronically transmitted the above and foregoing pleading to the following ECF registrants:

W. A. Drew Edmondson, Attorney General	fc_docket@oag.state.ok.us
Kelly H. Burch, Assistant Attorney General	kelly_burch@oag.state.ok.us
J. Trevor Hammons, Assistant Attorney General	trevor_hammons@oag.state.ok.us
Tina Lynn Izadi, Assistant Attorney General	tina_izadi@oag.state.ok.us
Daniel P. Lennington, Assistant Attorney General	daniel.lennington@oag.ok.gov
M. David Riggs	driggs@riggsabney.com
Joseph P. Lennart	jlennart@riggsabney.com
Richard T. Garren	rgarren@riggsabney.com
Douglas A. Wilson	doug_wilson@riggsabney.com
Sharon K. Weaver	sweaver@riggsabney.com
Robert A. Nance	rnance@riggsabney.com
D. Sharon Gentry	sgentry@riggsabney.com
David P. Page	dpage@riggsabney.com
RIGGS, ABNEY, NEAL, TURPEN, ORBISON & LEWIS	
Louis Werner Bullock	lbullock@bullock-blakemore.com
Robert M. Blakemore	bblakemore@bullock-blakemore.com
BULLOCK, BULLOCK & BLAKEMORE	
Frederick C. Baker	fbaker@motleyrice.com
Lee M. Heath	lheath@motleyrice.com
Elizabeth C. Ward	lward@motleyrice.com
Elizabeth Claire Xidis	cxidis@motleyrice.com
William H. Narwold	bnarwold@motleyrice.com
Ingrid L. Moll	imoll@motleyrice.com
Jonathan D. Orent	jorent@motleyrice.com
Michael G. Rousseau	mrousseau@motleyrice.com
Fidelma L. Fitzpatrick	ffitzpatrick@motleyrice.com
MOTLEY RICE, LLC	
Counsel for State of Oklahoma	

Robert P. Redemann rredemann@pmrlaw.net
Lawrence W. Zeringue lzeringue@pmrlaw.net
David C. Senger dsenger@pmrlaw.net
PERRINE, MCGIVERN, REDEMANN, REID, BARRY & TAYLOR, P.L.L.C.

Robert E Sanders rsanders@youngwilliams.com
Edwin Stephen Williams steve.williams@youngwilliams.com
YOUNG WILLIAMS P.A.
Counsel for Cal-Maine Farms, Inc and Cal-Maine Foods, Inc.

John H. Tucker jtucker@rhodesokla.com
Theresa Noble Hill thill@rhodesokla.com
Colin Hampton Tucker ctucker@rhodesokla.com
Leslie Jane Southerland ljsoutherland@rhodesokla.com
RHODES, HIERONYMUS, JONES, TUCKER & GABLE

Terry Wayen West terry@thewestlawfirm.com
THE WEST LAW FIRM

Delmar R. Ehrich dehrich@faegre.com
Bruce Jones bjones@faegre.com
Dara D. Mann dmann@faegre.com
Krisann C. Kleibacker Lee kklee@faegre.com
Todd P. Walker twalker@faegre.com
FAEGRE & BENSON, LLP
Counsel for Cargill, Inc. & Cargill Turkey Production, LLC

James Martin Graves jgraves@bassettlawfirm.com
Gary V Weeks gweeks@bassettlawfirm.com
Paul E. Thompson, Jr pthompson@bassettlawfirm.com
Woody Bassett wbassett@bassettlawfirm.com
Jennifer E. Lloyd jlloyd@bassettlawfirm.com
BASSETT LAW FIRM

George W. Owens gwo@owenslawfirmpc.com
Randall E. Rose rer@owenslawfirmpc.com
OWENS LAW FIRM, P.C.
Counsel for George's Inc. & George's Farms, Inc.

A. Scott McDaniel smcdaniel@mhla-law.com
Nicole Longwell nlongwell@mhla-law.com

Philip Hixon phixon@mhla-law.com
Craig A. Merkes cmerkes@mhla-law.com
MCDANIEL, HIXON, LONGWELL & ACORD, PLLC

Sherry P. Bartley sbartley@mwsgw.com
MITCHELL, WILLIAMS, SELIG, GATES & WOODYARD, PLLC
Counsel for Peterson Farms, Inc.

John Elrod jelrod@cwlaw.com
Vicki Bronson vbronson@cwlaw.com
P. Joshua Wisley jwisley@cwlaw.com
Bruce W. Freeman bfreeman@cwlaw.com
D. Richard Funk rfunk@cwlaw.com
CONNER & WINTERS, LLP
Counsel for Simmons Foods, Inc.

Stephen L. Jantzen sjantzen@ryanwhaley.com
Paula M. Buchwald pbuchwald@ryanwhaley.com
Patrick M. Ryan pryan@ryanwhaley.com
RYAN, WHALEY, COLDIRON & SHANDY, P.C.

Mark D. Hopson mhopson@sidley.com
Jay Thomas Jorgensen jjorgensen@sidley.com
Timothy K. Webster twebster@sidley.com
Thomas C. Green tcgreen@sidley.com
Gordon D. Todd gtodd@sidley.com
SIDLEY, AUSTIN, BROWN & WOOD LLP

Robert W. George robert.george@kutakrock.com
Michael R. Bond michael.bond@kutakrock.com
Erin W. Thompson erin.thompson@kutakrock.com
KUTAK ROCK, LLP
Counsel for Tyson Foods, Inc., Tyson Poultry, Inc., Tyson Chicken, Inc., & Cobb-Vantress, Inc.

R. Thomas Lay rtl@kiralaw.com
KERR, IRVINE, RHODES & ABLES

Jennifer Stockton Griffin jgriffin@lathropgage.com
David Gregory Brown
LATHROP & GAGE LC
Counsel for Willow Brook Foods, Inc.

Robin S Conrad rconrad@uschamber.com
NATIONAL CHAMBER LITIGATION CENTER

Gary S Chilton gchilton@hcdattorneys.com
HOLLADAY, CHILTON AND DEGIUSTI, PLLC
Counsel for US Chamber of Commerce and American Tort Reform Association

D. Kenyon Williams, Jr. kwilliams@hallestill.com
Michael D. Graves mgraves@hallestill.com
HALL, ESTILL, HARDWICK, GABLE, GOLDEN & NELSON
Counsel for Poultry Growers/Interested Parties/ Poultry Partners, Inc.

Richard Ford richard.ford@crowedunlevy.com
LeAnne Burnett leanne.burnett@crowedunlevy.com
CROWE & DUNLEVY
Counsel for Oklahoma Farm Bureau, Inc.

Kendra Akin Jones, Assistant Attorney General Kendra.Jones@arkansasag.gov
Charles L. Moulton, Sr Assistant Attorney General Charles.Moulton@arkansasag.gov
Counsel for State of Arkansas and Arkansas National Resources Commission

Mark Richard Mullins richard.mullins@mcafeetaft.com
MCAFEE & TAFT
Counsel for Texas Farm Bureau; Texas Cattle Feeders Association; Texas Pork Producers Association and Texas Association of Dairymen

Mia Vahlberg mvahlberg@gablelaw.com
GABLE GOTWALS

James T. Banks jtbanks@hhlaw.com
Adam J. Siegel ajsiegel@hhlaw.com
HOGAN & HARTSON, LLP
Counsel for National Chicken Council; U.S. Poultry and Egg Association & National Turkey Federation

John D. Russell jrussell@fellerssnider.com
FELLERS, SNIDER, BLANKENSHIP, BAILEY
& TIPPENS, PC

William A. Waddell, Jr. waddell@fec.net

David E. Choate dchoate@fec.net
FRIDAY, ELDREDGE & CLARK, LLP
Counsel for Arkansas Farm Bureau Federation

Barry Greg Reynolds reynolds@titushillis.com
Jessica E. Rainey jrainey@titushillis.com
TITUS, HILLIS, REYNOLDS, LOVE,
DICKMAN & MCCALMON

Nikaa Baugh Jordan njordan@lightfootlaw.com
William S. Cox, III wcox@lightfootlaw.com
LIGHTFOOT, FRANKLIN & WHITE, LLC
Counsel for American Farm Bureau and National Cattlemen's Beef Association

Also on this 24th day of March, 2008 I mailed a copy of the above and foregoing pleading to:

David Gregory Brown
Lathrop & Gage LC
314 E HIGH ST
JEFFERSON CITY, MO 65101

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

Steven B. Randall
58185 County Road 658
Kansas, Ok 74347

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

George R. Stubblefield
HC 66, Box 19-12
Proctor, Ok 74457

C Miles Tolbert
Secretary of the Environment
State of Oklahoma

3800 NORTH CLASSEN
OKLAHOMA CITY, OK 73118

Gary V. Weeks
Bassett Law Firm
P. O. Box 3618
Fayetteville, AR 72702

Dustin McDaniel
Justin Allen
Office of the Attorney General (Little Rock)
323 Center St, Ste 200
Little Rock, AR 72201-2610

Richard T. Garren

"EXHIBIT A"

I. Definitions

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

2. "Your poultry growing operations" means any poultry growing facility where birds owned by you are being fed, 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 Your 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. Your corporate history, businesses, and organizational structure, including without limitation:

a. identification of officers, directors and shareholders of CTP, its divisions, and subsidiaries past and present;

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

c. CTP's relationship in or to any LLC, limited partnership, joint venture, public company 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,

e. Notices from governmental agencies alleging that CTP, its subsidiaries, agents or employees were/are a potential responsible party at sites under CERCLA or other environmental cleanup laws;

f. Identification of any cleanup sites where costs were incurred by (or alleged to be due from) CTP, its subsidiaries, agents or employees for environmental harm from the constituents of poultry waste such as Nitrogen, Phosphorus (Phosphorous), Potassium including compounds thereof, and/or any pathogens and bacteria.

g. Explanation and correlation of the business platforms and business units employed by Cargill, Inc. in relation to CTP.

h. Cargill Inc.'s interaction and communications with, management of, and supervision of Cargill Turkey Production LLC.

2. 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 attachments, amendments or changes to the contracts considered, proposed or adopted and whether the terms and conditions, of your contracts with poultry growers located outside of the IRW, past and present, were substantially different than those utilized for growers within the IRW.

3. The relationship between you and persons / entities owning or operating poultry growing operations under contract with you.

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

5. Differences in the method, manner, direction or management of your poultry growing operations in Oklahoma compared to the method, manner, direction or management of your poultry growing operations in:

a. Arkansas

b. Virginia

c. Texas

d. Missouri

6. 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.

7. Participation in, communication with and contributions and payments (financial or otherwise) to the Poultry Community Council, Poultry Partners, BMP's Inc., the Poultry Federation, Virginia 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).

8. Knowledge of, participation in, contribution (financial or otherwise) to the National Poultry Waste Symposium 1998-present.

9. The allegations made in paragraph 3 of the Third Party Complaint [DKT. #80] including facts, knowledge, materials or documents relied in support of such allegations.

10. 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).

11. 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.).

12. 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).

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

14. The purpose of your relationship and/or participation with the following companies AgriStats; Agrimetrics Associates; Intellimetrics; and Rahn & Assoc. or their predecessors or successors in interest, including the data, reports, communications and information supplied to or received from these companies, past and present.

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

16. The number, size and location of poultry houses / barns and the number of and kind of birds raised in the IRW each year by you or poultry growers under contract with you, including without limitation:

a. knowledge of all documents produced by CTP in this case as being responsive to the State's inquiry about the number and kind of birds raised/grown by CTP and/or its contract growers yearly or annually within the IRW past and present, including without limitation CARTP 123574-123734; and

b. knowledge and explanation of CTP's investigation, examination of records, determination and calculation as to the total number of birds it produced annually (fiscal year) in the IRW as required by the courts Opinion and Order December 6, 2007, Docket #1409.

17. The formulas, ratios, "rules of thumb" utilized by CTP and others in the poultry industry to convert the amount of pounds of poultry meat produced into the number of birds raised and slaughtered for such meat.

18. The amount of feed and new bedding litter used at each and all of your poultry growing operations within the IRW on an annual basis (or 12 month period).

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

20. The general geographical location for the source of the ingredients used in the feed, additives, amendments and medications provided to your birds within the IRW.

21. The additives or supplements, including without limitation antibiotics, hormones, arsenic compounds, contained in feed formulas, past and present, used at your poultry growing operations within the IRW.

22. Your knowledge of, participation or communication with, and contributions for, BMP Inc. or its officers and agents, regarding the hauling of poultry waste from the IRW.

23. Knowledge or use of, investments made for or in, any alternative methods for the use or disposal of poultry waste.

24. 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.

"EXHIBIT B"

I. Definitions

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

2. "Your poultry growing operations" means any poultry growing facility where birds owned by you are being fed, 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 Your 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:

25. 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 including without limitation identification of any difference between turkey and chicken excrement. The existence and type of bacteria found in poultry waste and its presence in the environment, including the IRW.

26. The amount of poultry waste generated during the lifetime of an individual bird or flock of birds, specified by bird types and number, owned by you, past and present, within the IRW.

27. The amount of poultry waste generated by each and all of your poultry growing operations within the IRW on an annual basis (or 12 month period) and including without limitation knowledge of all documents produced by CTP in this case as being responsive to the

State's inquiry of the same including without limitation knowledge and explanation of CTP's documents identified as CARTP 123736-123831.

28. The identity of any chemical, compound, additive or amendment added to or mixed into the litter in the growing barns, before, during or after the birds are in the barns and the purpose, effect, expected or known result of adding or mixing the same into the litter, including the source of knowledge of the effects of its use.

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

30. Practices, policies, recommendations 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.

31. 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.

32. 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 within the IRW of as a result of:

a. 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).

b. Legislation, ordinances, rules, regulations or studies involving Cargill, Inc., or Cargill Turkey Production, LLC growing operations in or near Virginia

c. Legislation, ordinances, rules, regulations or studies involving Cargill, Inc., or Cargill Turkey Production, LLC growing operations in or near Texas

d. Studies, investigations, programs, seminars, symposia involving the storage, handling, and/or disposition of poultry waste.

33. 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 on or disposed of.

34. 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.

35. 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.

36. 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.

37. 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.

38. 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.

39. 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.

40. Knowledge and use of 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 run-off / discharge / or release of poultry waste or the constituents of those into the waters of the IRW.

41. Efforts undertaken for, knowledge or use of, investments made for or in, any alternative methods for the use or disposal of poultry waste and any quantification of results obtained from use of alternative methods.

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.	)	

SECOND AMENDED
NOTICE OF DEPOSITION OF CARGILL INC.
(Rule 30(b)(6) of the Federal Rules of Civil Procedure)

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 **April 22, 2008** for inquiries set forth on Exhibit "A" attached hereto and at the same time on **April 23, 2008** for inquiries set forth on Exhibit "B" attached hereto, all at the offices of 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 Exhibits "A" & "B":

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
Daniel P. Lennington OBA #21577
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
David P. Page OBA #6852
RIGGS, ABNEY, NEAL, TURPEN,
ORBISON & LEWIS
502 West Sixth Street
Tulsa, OK 74119
(918) 587-3161

Louis W. Bullock OBA #1305
Robert M. Blakemore OBA 18656
BULLOCK, BULLOCK & BLAKEMORE
110 West Seventh Street Suite 707
Tulsa OK 74119
(918) 584-2001

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

Jonathan D. Orent
(admitted *pro hac vice)*
Michael G. Rousseau

(admitted *pro hac vice)*
Fidelma L. Fitzpatrick
(admitted *pro hac vice)*
MOTLEY RICE, LLC
321 South Main Street
Providence, RI 02940
(401) 457-7700

Attorneys for the State of Oklahoma

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of March, 2008, I electronically transmitted the above and foregoing pleading to the following ECF registrants:

W. A. Drew Edmondson, Attorney General	fc_docket@oag.state.ok.us
Kelly H. Burch, Assistant Attorney General	kelly_burch@oag.state.ok.us
J. Trevor Hammons, Assistant Attorney General	trevor_hammons@oag.state.ok.us
Tina Lynn Izadi, Assistant Attorney General	tina_izadi@oag.state.ok.us
Daniel P. Lennington, Assistant Attorney General	daniel.lennington@oag.ok.gov
M. David Riggs	driggs@riggsabney.com
Joseph P. Lennart	jlennart@riggsabney.com
Richard T. Garren	rgarren@riggsabney.com
Douglas A. Wilson	doug_wilson@riggsabney.com
Sharon K. Weaver	sweaver@riggsabney.com
Robert A. Nance	rnance@riggsabney.com
D. Sharon Gentry	sgentry@riggsabney.com
David P. Page	dpage@riggsabney.com
RIGGS, ABNEY, NEAL, TURPEN, ORBISON & LEWIS	
Louis Werner Bullock	lbullock@bullock-blakemore.com
Robert M. Blakemore	bblakemore@bullock-blakemore.com
BULLOCK, BULLOCK & BLAKEMORE	
Frederick C. Baker	fbaker@motleyrice.com
Lee M. Heath	lheath@motleyrice.com
Elizabeth C. Ward	lward@motleyrice.com
Elizabeth Claire Xidis	cxidis@motleyrice.com
William H. Narwold	bnarwold@motleyrice.com
Ingrid L. Moll	imoll@motleyrice.com
Jonathan D. Orent	jorent@motleyrice.com
Michael G. Rousseau	mrousseau@motleyrice.com
Fidelma L. Fitzpatrick	ffitzpatrick@motleyrice.com
MOTLEY RICE, LLC	

Counsel for State of Oklahoma

Robert P. Redemann rredemann@pmrlaw.net
Lawrence W. Zeringue lzeringue@pmrlaw.net
David C. Senger dsenger@pmrlaw.net
PERRINE, MCGIVERN, REDEMANN, REID, BARRY & TAYLOR, P.L.L.C.

Robert E Sanders rsanders@youngwilliams.com
Edwin Stephen Williams steve.williams@youngwilliams.com
YOUNG WILLIAMS P.A.
Counsel for Cal-Maine Farms, Inc and Cal-Maine Foods, Inc.

John H. Tucker jtucker@rhodesokla.com
Theresa Noble Hill thill@rhodesokla.com
Colin Hampton Tucker ctucker@rhodesokla.com
Leslie Jane Southerland ljsoutherland@rhodesokla.com
RHODES, HIERONYMUS, JONES, TUCKER & GABLE

Terry Wayen West terry@thewestlawfirm.com
THE WEST LAW FIRM

Delmar R. Ehrich dehrich@faegre.com
Bruce Jones bjones@faegre.com
Dara D. Mann dmann@faegre.com
Krisann C. Kleibacker Lee kklee@faegre.com
Todd P. Walker twalker@faegre.com
FAEGRE & BENSON, LLP
Counsel for Cargill, Inc. & Cargill Turkey Production, LLC

James Martin Graves jgraves@bassettlawfirm.com
Gary V Weeks gweeks@bassettlawfirm.com
Paul E. Thompson, Jr pthompson@bassettlawfirm.com
Woody Bassett wbassett@bassettlawfirm.com
Jennifer E. Lloyd jlloyd@bassettlawfirm.com
BASSETT LAW FIRM

George W. Owens gwo@owenslawfirmpc.com
Randall E. Rose rer@owenslawfirmpc.com
OWENS LAW FIRM, P.C.
Counsel for George's Inc. & George's Farms, Inc.

A. Scott McDaniel smcdaniel@mhla-law.com

Nicole Longwell nlongwell@mhla-law.com
Philip Hixon phixon@mhla-law.com
Craig A. Merkes cmerkes@mhla-law.com
MCDANIEL, HIXON, LONGWELL & ACORD, PLLC

Sherry P. Bartley sbartley@mwsgw.com
MITCHELL, WILLIAMS, SELIG, GATES & WOODYARD, PLLC
Counsel for Peterson Farms, Inc.

John Elrod jelrod@cwlaw.com
Vicki Bronson vbronson@cwlaw.com
P. Joshua Wisley jwisley@cwlaw.com
Bruce W. Freeman bfreeman@cwlaw.com
D. Richard Funk rfunk@cwlaw.com
CONNER & WINTERS, LLP
Counsel for Simmons Foods, Inc.

Stephen L. Jantzen sjantzen@ryanwhaley.com
Paula M. Buchwald pbuchwald@ryanwhaley.com
Patrick M. Ryan pryan@ryanwhaley.com
RYAN, WHALEY, COLDIRON & SHANDY, P.C.

Mark D. Hopson mhopson@sidley.com
Jay Thomas Jorgensen jjorgensen@sidley.com
Timothy K. Webster twebster@sidley.com
Thomas C. Green tcgreen@sidley.com
Gordon D. Todd gtodd@sidley.com
SIDLEY, AUSTIN, BROWN & WOOD LLP

Robert W. George robert.george@kutakrock.com
Michael R. Bond michael.bond@kutakrock.com
Erin W. Thompson erin.thompson@kutakrock.com
KUTAK ROCK, LLP
Counsel for Tyson Foods, Inc., Tyson Poultry, Inc., Tyson Chicken, Inc., & Cobb-Vantress, Inc.

R. Thomas Lay rtl@kiralaw.com
KERR, IRVINE, RHODES & ABLES

Jennifer Stockton Griffin jgriffin@lathropgage.com
David Gregory Brown
LATHROP & GAGE LC
Counsel for Willow Brook Foods, Inc.

Robin S Conrad rconrad@uschamber.com
NATIONAL CHAMBER LITIGATION CENTER

Gary S Chilton gchilton@hcdattorneys.com
HOLLADAY, CHILTON AND DEGIUSTI, PLLC
Counsel for US Chamber of Commerce and American Tort Reform Association

D. Kenyon Williams, Jr. kwilliams@hallestill.com
Michael D. Graves mgraves@hallestill.com
HALL, ESTILL, HARDWICK, GABLE, GOLDEN & NELSON
Counsel for Poultry Growers/Interested Parties/ Poultry Partners, Inc.

Richard Ford richard.ford@crowedunlevy.com
LeAnne Burnett leanne.burnett@crowedunlevy.com
CROWE & DUNLEVY
Counsel for Oklahoma Farm Bureau, Inc.

Kendra Akin Jones, Assistant Attorney General Kendra.Jones@arkansasag.gov
Charles L. Moulton, Sr Assistant Attorney General Charles.Moulton@arkansasag.gov
Counsel for State of Arkansas and Arkansas National Resources Commission

Mark Richard Mullins richard.mullins@mcafeetaft.com
MCAFEE & TAFT
Counsel for Texas Farm Bureau; Texas Cattle Feeders Association; Texas Pork Producers Association and Texas Association of Dairymen

Mia Vahlberg mvahlberg@gablelaw.com
GABLE GOTWALS

James T. Banks jtbanks@hhlaw.com
Adam J. Siegel ajsiegel@hhlaw.com
HOGAN & HARTSON, LLP
Counsel for National Chicken Council; U.S. Poultry and Egg Association & National Turkey Federation

John D. Russell jrussell@fellerssnider.com
FELLERS, SNIDER, BLANKENSHIP, BAILEY
& TIPPENS, PC

William A. Waddell, Jr. waddell@fec.net
David E. Choate dchoate@fec.net
FRIDAY, ELDREDGE & CLARK, LLP
Counsel for Arkansas Farm Bureau Federation

Barry Greg Reynolds reynolds@titushillis.com
Jessica E. Rainey jrainey@titushillis.com
TITUS, HILLIS, REYNOLDS, LOVE,
DICKMAN & MCCALMON

Nikaa Baugh Jordan njordan@lightfootlaw.com
William S. Cox, III wcox@lightfootlaw.com
LIGHTFOOT, FRANKLIN & WHITE, LLC
Counsel for American Farm Bureau and National Cattlemen's Beef Association

Also on this 24th day of March, 2008 I mailed a copy of the above and foregoing pleading to:

David Gregory Brown
Lathrop & Gage LC
314 E HIGH ST
JEFFERSON CITY, MO 65101

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

Steven B. Randall
58185 County Road 658
Kansas, Ok 74347

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

George R. Stubblefield
HC 66, Box 19-12
Proctor, Ok 74457

C Miles Tolbert
Secretary of the Environment

State of Oklahoma
3800 NORTH CLASSEN
OKLAHOMA CITY, OK 73118

Gary V. Weeks
Bassett Law Firm
P. O. Box 3618
Fayetteville, AR 72702

Dustin McDaniel
Justin Allen
Office of the Attorney General (Little Rock)
323 Center St, Ste 200
Little Rock, AR 72201-2610

Richard T. Garren

"EXHIBIT A"

I. Definitions

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

2. "Your poultry growing operations" means any poultry growing facility where birds owned by you are being fed, 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 Your 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. Your corporate history, businesses, and organizational structure, including without limitation:

a. identification of officers, directors, managers and shareholders of Cargill Inc, its divisions, and subsidiaries past and present and those officers, directors managers and shareholders which are or have been shareholders, officers, directors, and managers of Cargill Value Added Meats, Cargill Turkey Products, Inc., Cargill Turkey Production LLC., and the Mosaic Company;

b. Cargill's relationship with any parent, affiliate, holding company or subsidiary, business platform or business unit;

c. Cargill's relationship in or to any LLC, limited partnership, joint venture, public company or association, including without limitation the events and

details of the transaction of Cargill creating the Limited Liability Company called Cargill Turkey Production, LLC to grow turkeys;

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, including without limitation fertilizer and crop nutrient interests and the correlation or association by corporate structure to Cargill Inc.

e. Your relationship with the following entities: Shady Brook Farms; Plantation Farms Inc; Sunny Fresh Foods Inc.; Rocco Farms, Inc.; Southern Poultry Farms, Inc.; The Mosaic Company; Cargill Turkey Products, Inc.

f. Cargill's fertilizer businesses (or interest therein) past and present, previously owned and operated including without limitation those businesses merged with IMC Global as Cargill's contribution resulting in the new company called The Mosaic Company.

g. Notices from governmental agencies alleging that Cargill, its subsidiaries, agents or employees were/are a potential responsible party at sites under CERCLA or other environmental cleanup laws;

h. Identification of any cleanup sites where costs were incurred by (or alleged to be due from) CTP, its subsidiaries, agents or employees for environmental harm from the constituents of poultry waste such as Nitrogen, Phosphorus (Phosphorous), Potassium including compounds thereof, and/or any pathogens and bacteria;

i. Explanation and correlation of the business platforms and business units employed by Cargill with any corporate entities owned or affiliated with Cargill and explanation and correlation of the corporate structure of all corporations, limited liability companies, partnerships, and organizations owned in whole or part by Cargill identified in any such business platform or unit.

2. Cargill Inc.'s interaction and communications with, management of, and supervision of Cargill Turkey Production LLC.

3. 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 attachments, amendments or changes to the contracts considered, proposed or adopted and whether the terms and conditions, of your contracts with poultry growers located outside of the IRW, past and present, were substantially different than those utilized for growers within the IRW

4. The relationship between you and persons / entities owning or operating poultry growing operations under contract with you.

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

6. Differences in the method, manner, direction or management of your poultry growing operations in Oklahoma compared to the method, manner, direction or management of your poultry growing operations in:

a. Arkansas

b. Virginia

c. Texas

d. Missouri

7. 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.

8. Participation in, communication with and contributions and payments (financial or otherwise) to the Poultry Community Council, Poultry Partners, BMP's Inc., the Poultry Federation, Virginia 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).

9. Knowledge of, participation in, contribution (financial or otherwise) to the National Poultry Waste Symposium 1998-present.

10. The allegations made in paragraph 3 of the Third Party Complaint [DKT. #80] including facts, knowledge, materials or documents relied in support of such allegations.

11. 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).

12. 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.).

13. 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).

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

15. The purpose of your relationship and/or participation with the following companies AgriStats; Agrimetrics Associates; Intellimetrics; and Rahn & Assoc. or their predecessors or successors in interest, including the data, reports, communications and information supplied to or received from these companies, past and present.

"EXHIBIT B"

I. Definitions

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

2. "Your poultry growing operations" means any poultry growing facility where birds owned by you are being fed, 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 Your 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:

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

17. The number, size and location of poultry houses / barns and the number of and kind of birds raised in the IRW each year by you or poultry growers under contract with you, including without limitation:

a. knowledge of all documents produced by Cargill in this case as being responsive to the State's inquiry about the number and kind of birds raised/grown by Cargill and/or its contract growers yearly or annually within the IRW past and present, including without limitation CARTP 123574-123734; and

b. knowledge and explanation of Cargill's investigation, examination of records, determination and calculation as to the total number of birds it

produced annually (fiscal year) in the IRW as required by the courts Opinion and Order December 6, 2007, Docket #1409.

18. The formulas, ratios, "rules of thumb" utilized by Cargill and others in the poultry industry to convert the amount of pounds of poultry meat produced into the number of birds raised and slaughtered for such meat.

19. The amount of feed and new bedding litter used at each and all of your poultry growing operations within the IRW on an annual basis (or 12 month period).

20. 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 including without limitation identification of any difference between turkey and chicken excrement. The existence and type of bacteria found in poultry waste and its presence in the environment, including the IRW.

21. The amount of poultry waste generated during the lifetime of an individual bird or flock of birds, specified by bird types and number, owned by you, past and present, within the IRW.

22. The amount of poultry waste generated by each and all of your poultry growing operations within the IRW on an annual basis (or 12 month period) and including without limitation knowledge of all documents produced by Cargill in this case as being responsive to the State's inquiry of the same including, without limitation, knowledge and explanation of Cargill's documents identified as CARTP 123736-123831.

23. The ingredients and composition of feed formulas, past and present, used at your poultry growing operations within the IRW and identification of any differences in formulas used in growing operations not in the IRW.

24. The general geographical location for the source of the ingredients used in the feed, additives, amendments and medications provided to your birds within the IRW.

25. The additives or supplements, including without limitation antibiotics, hormones, arsenic compounds, contained in feed formulas, past and present, used at your poultry growing operations within the IRW.

26. The identity of any chemical, compound, additive or amendment added to or mixed into the litter in the growing barns, before, during or after the birds are in the barns and

the purpose, effect, expected or known result of adding or mixing the same into the litter, including the source of knowledge of the effects of its use.

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

28. Practices, policies, recommendations 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, either by Cargill, its affiliates, subsidiaries, employees, and agents or by others growing poultry on behalf of Cargill.

29. 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.

30. Your knowledge of, participation or communication with, and contributions for, BMP Inc. or its officers and agents, regarding the hauling of poultry waste from the IRW.

31. Description of any changes and the 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 within the IRW of as a result of:

a. 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. 01- CV 0900 EA(C).

b. Legislation, ordinances, rules, regulations or studies involving Cargill, Inc., or Cargill Turkey Production, LLC growing operations in or near Virginia

c. Legislation, ordinances, rules, regulations or studies involving Cargill, Inc., or Cargill Turkey Production, LLC growing operations in or near Texas

d. Studies, investigations, programs, seminars, symposia involving the storage, handling, and/or disposition of poultry waste.

32. 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 on or disposed of.

33. 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.

34. 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 including the nature, manner and method of the dissemination of any such knowledge to Cargill Turkey Production, LLC.

35. 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 including the nature, manner and method of the dissemination of any such knowledge to Cargill Turkey Production, LLC.

36. 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.

37. 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 including the nature, manner and method of the dissemination of any such knowledge to Cargill Turkey Production, LLC.

38. 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.

39. Knowledge and use of 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 run-off / discharge / or release of poultry waste or the constituents of those into the waters of the IRW.

40. Efforts undertaken for, knowledge or use of, investments made for or in, any alternative methods for the use or disposal of poultry waste and any quantification of results obtained from use of alternative methods.

41. 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.