MotleyRice LLC
ATTORNEYS AT LAW

Claire Xidis
Licensed in SC, NY, DC, WV
DIRECT DIAL 843.216.9251
DIRECT FAX 843.216.9440
CXidis@motleyrice.com

January 2, 2009

VIA FEDERAL EXPRESS OVERNIGHT DELIVERY
Leslie J. Southerland
Rhodes, Hieronymus, Jones, Tucker & Gable
100 W. 5th St., Suite 400
Tulsa, Oklahoma 74103

Exhibit 1

RE: *State of Oklahoma, et. al. v. Tyson, et al.*
Civil Action Number: 05-CV-0329-GKF-SAJ

Dear Leslie,

Enclosed is a hard drive containing materials pertaining to the State's damages experts. In the Stratus folder there is a subfolder for each contributing author to the Stratus report, as well a subfolder containing shared considered materials for the authors of the Stratus report. In each author's subfolder there are additional subfolders containing the author's C.V. and billing information, considered materials, and correspondence. In the Payne folder, there are subfolders containing his C.V. and billing information, considered materials, and correspondence. As explained to you in my email dated December 31, 2008, rather than reproducing the financial records produced by Defendants that David Payne reviewed, we are including a document which lists those records.

If there is not a separate "testimony" or "publications" list included in the subfolder with an expert's C.V., that is because this information is either included in their C.V. or because there is nothing to list.

For the considered materials, we have made our best efforts to retain the file structure of the electronic files maintained by the experts. Rather than converting electronic files to PDF format and bates marking the individual pages, we are producing electronic materials in their native file format and have added a prefix with a bates designation to the file names.

There may be some file types in this production that are not familiar to you. Below is a chart of file types and programs that can be used to open them:

RECEIVED
JAN 05 2009
RHODES HIERONYMUS JONES TUCKER & GABLE PLLC
TULSA, OKLAHOMA

Extension	Program that will open file	File Type
7	Microsoft Excel	Excel spreadsheet
bdb	Blaise Database Browser	Blaise database
bdm	Blaise Structure Browser	prepared instrument file
bdv	Blaise	Database view file
bfi	Blaise Database Browser	Internal file information
bjk	Blaise Database Browser	Internal join key file
BK	Microsoft Word	Word file
bmf	Blaise Menu Editory	Blaise survey menu file
bmi	Blaise Structure Browser	prepared instrument file
bpk	Blaise Database Browser	Primary key file
bxi	Blaise Structure Browser	prepared instrument file
css	Notepad or any other text editor	text file
DFT	S-Plus	temp work file
dim	S-Plus	temp work file
JNB	Sigma Plot	
lut	S-Plus	temp work file
max	S-Plus	temp work file
r1	S-Plus	temp work file
sas	SAS Institute SAS software	
sas7bcat	SAS Institute SAS software	
sas7bdat	SAS Institute SAS software	
sav	SPSS	
sbf	S-Plus	temp work file
sd2	SAS Institute SAS Software	
shs	S-Plus	temp work file
smn	S-Plus	temp work file
ssc	S-Plus	temp work file
STB	S-Plus	temp work file
tk	S-Plus	temp work file
wbk	Word	word file
wed	S-Plus	temp work file

We were not able to gather some of the most recent email correspondence from the damages experts in time to process and include them this hard drive. We are gathering those last emails and will provide a supplemental production of those to you in the near future. Due to logistical difficulties associated with the transfer of materials from the Eudora email systems used by Drs. Krosnick and Hanemann, there are some email attachments we were not able to include on this hard drive. We will be providing those email attachments to you in the near future.

We have made our best effort to locate and produce all considered materials for the damages experts, however if omissions are discovered we will supplement this production.

Sincerely,

Claire Xidis

Claire Xidis

CX/mmj