EXHIBIT

B

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

STATE OF OKLAHOMA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	**Case No. 05-cv-329-GKF(PJC)**
	)	
TYSON FOODS, INC., et al.,	)	
	)	
Defendants.	)	

STATE OF OKLAHOMA'S INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF MARCH 17, 2009
TO TYSON CHICKEN, INC.

To: Tyson Chicken, Inc.
c/o Robert W. George
Michael R. Bond
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The Three Sisters Building
214 West Dickson Street
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Pursuant to Rules 33 and 34 of the Fed.R.Civ.P., the State of Oklahoma submits the following Interrogatories and Requests for Production of Documents to Tyson Chicken, Inc. Unless otherwise agreed by the parties, the State of Oklahoma designates as the reasonable time and place for production of documents as 10:00 a.m. on April 16, 2009, at the offices of undersigned counsel, 5801 N. Broadway Extension, Suite 101, Oklahoma City, OK 73118.

INSTRUCTIONS

1. You must answer each Interrogatory fully and under oath, within thirty days of service.

2. Each Interrogatory is to be answered fully on the basis of information which is in your possession.

3. In each of your answers to these Interrogatories, you are requested to provide not only such information as is in your possession, but also information as is reasonably available. In the event that you are able to provide only part of the information called for by any particular Interrogatory, please provide all the information you are able to provide and state the reason for your inability to provide the remainder.

4. If you object to any portion of an Interrogatory, please provide all information called for by that portion of the interrogatory to which you do not object. For those portions of an Interrogatory to which you object, state the reasons for such objection or declination.

5. Every Interrogatory herein shall be deemed a continuing Interrogatory and you are to supplement your answers promptly if and when you obtain relevant information in addition to, or in any way inconsistent with, your initial answer to such Interrogatory.

DEFINITIONS

1. As used herein, the words "and" and "or" shall mean and/or and be construed disjunctively or conjunctively, as necessary, to bring within the scope of the Request all documents that might otherwise be construed outside the scope.

2. As used herein, the word "Document" is to be construed in its broadest sense, and shall include documents, data, and tangible things in possession, custody, and control of Tyson Chicken, Inc. in this action, and any employees, agents, contractors, carriers, bailees, or other non-parties who possess materials reasonably anticipated to be subject to discovery in this action. "Documents, data, and tangible things" is to be interpreted broadly to include any original, reproduction, copy or draft of any kind of written or documented material stored in any medium, including *electronically stored information*, and including but not limited to, writings, records,

files, correspondence, reports, memoranda, interoffice communication, calendars, diaries, contact manager information, minutes, electronic messages, E-mail, E-Mail attachments, minutes of meetings, records of telephonic conferences, hand held device data, backup data (excluding duplicative data maintained for purposes of disaster recovery), removable computer storage media such as tapes, flash or thumb drives, discs and cards, printouts, document image files, blogs, Web pages, databases, spreadsheets, books, ledgers, journals, orders, invoices, bills, vouchers, checks, statements, worksheets, summaries, compilations, computations, diagrams, graphic presentations, drawings, films, charts, digital or chemical process photographs, audio and video tapes, phonographic tape or digital recordings or transcripts thereof, drafts, jottings and notes, studies or drafts of studies or other similar such material. Additionally, Electronically Stored Information that is retrievable in any form. Lastly, Electronically Stored Information that serves to identify, locate, or link such material.

3. "Person" shall mean any natural person and/or corporation, partnership, association, joint venture, limited partnership, committee, any government and/or governmental body, commission, board and/or agencies and/or other business association and/or entity, including both singular and the plural.

4. The term "relating to" or "regarding" shall mean having any relationship or connection to, concerning, being connected to, commenting on, responding to, addressed to, sent to, containing, evidencing, showing, memorializing, describing, analyzing, reflecting, pertaining to, comprising, constituting, or otherwise establishing any reasonable, logical, or causal connection.

5. "State the basis for" means to reveal the factual basis for some allegation, defense, or claim of damages and identify all persons having knowledge of any portion of that factual basis, and identify all documents or writings evidencing any aspect of that factual basis.

6. "You" and "your" shall mean Tyson Chicken, 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.

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

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

9. "IRW" shall mean the Illinois River Watershed, in both of the States of Arkansas and Oklahoma.

INTERROGATORIES

1. Please identify each instance (including, where available, specific date, specific location, tonnage of waste applied, acreage upon which it was applied, and STP before application) in which poultry waste generated at your poultry feeding operations, or at poultry feeding operations under contract with you, has been land applied within the IRW as fertilizer, identifying all witnesses to the application and all documents evidencing it.

2. Please identify each instance (including, where available, specific date, specific location, tonnage of waste applied, acreage upon which it was applied, and STP before application) where poultry waste generated at your poultry feeding operations, or at poultry feeding operations under contract with you, has been land applied within the IRW which has not resulted in any run-off or leaching, identifying all witnesses to the application and all documents evidencing it.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Please produce all documents identified in the foregoing interrogatories.

2. Please produce all documents evidencing land application of poultry waste from your poultry feeding operations, or those of your contract growers, in the IRW in which the land application was used as fertilizer, including but not limited to the specific date, specific location, tonnage of waste applied, acreage upon which it was applied, and STP before application.

3. Please produce all documents evidencing land application of poultry waste from your poultry feeding operations, or those of your contract growers, in the IRW in which the land application of poultry waste has not resulted in any run-off or leaching, including but not limited to the specific date, specific location, tonnage of waste applied, acreage upon which it was applied, and STP before application.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of March, 2009, 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:

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