IN THE UNITED STATES DISTRICT COURT FOR THE

NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his capacity as ATTORNEY GENERAL OF THE STATE OF OKLAHOMA and OKLAHOMA SECRETARY OF THE ENVIRONMENT C. MILES TOLBERT, in his capacity as the TRUSTEE FOR NATURAL RESOURCES FOR THE STATE OF OKLAHOMA,	)
Plaintiff,	)
vs.	)4:05-CV-00329-TCK-SAJ
TYSON FOODS, INC., et al,	)
Defendants.	)

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THE VIDEOTAPED DEPOSITION OF

ARCHIE SCHAFFER, produced as a witness on behalf of the Plaintiff in the above styled and numbered cause, taken on the 9th day of July, 2008, in the City of Fayetteville, County of Washington, State of Arkansas, before me, Lisa A. Steinmeyer, a Certified Shorthand Reporter, duly certified under and by virtue of the laws of the State of Oklahoma.

Exhibit 31

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Q All of your -- the Tyson poultry are now grown by what are known as contract growers within that watershed?

A That's my understanding, although I'm, you know, not directly involved in that, so -- but I 09:26AM believe that to be the case.

Q And throughout the growing process, Tyson continues to maintain ownership of the poultry?

A Yes.

Q They provide all of the feed? 09:27AM

A Yes.

Q And they own the feed?

A Yes.

Q And do you know when one of the birds die that Tyson owns, whether Tyson continues to own that bird 09:27AM or does the ownership of the carcass pass to the grower?

MR. GEORGE: Object to the form, calls for a legal conclusion. Answer, if you can.

A I don't know the answer to exactly who owns 09:27AM the carcass. I do know that it's the responsibility by contract of the grower to be -- you know, to be responsible for the carcass, but I'm not sure who owns it actually.

Q Now, and the same is true of the manure that 09:28AM

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