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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VIDEO DEPOSITION OF JOHN LITTLEFIELD, produced as a witness on behalf of the Defendants in the above styled and numbered cause, taken on the 2nd day of August, 2007, in the City of Tulsa, County of Tulsa, State of Oklahoma, before me, Karla E. Barrow, a Certified Shorthand Reporter, duly certified under and by virtue of the laws of the State of Oklahoma.

EXHIBIT
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A I wouldn't say that that protects. I think that is a source is designed to protect. I -- I like the wording designed. I think that yes, it will help, but I don't think it's the whole -- the whole answer.

Q If you -- the reason I'm using the word land applicators is because I understand that a lot of people put litter down other than poultry growers?

A Yes, that's true.

Q So that's why I use the word land applicator. If -- if -- what else is there for a land applicator to use to guide his conduct in managing litter besides the animal waste management plan?

A That's -- that's primarily it other than speaking to somebody personally.

Q Well, if I have a written animal waste management plan that specifies what can be done in field two at Farmer Jones' place, I should be able to read that plan and follow that plan if I'm an applicator; correct?

A I think so.

Q In other words, I shouldn't have to call you every time?

A That's true.

Q Okay. So I want to come back to this prior