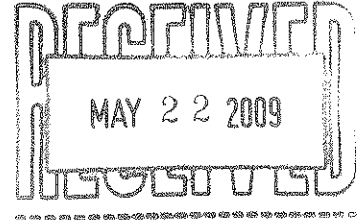


IN THE CIRCUIT COURT  
THIRD JUDICIAL CIRCUIT OF ILLINOIS  
MADISON COUNTY



HOLIDAY SHORES SANITARY DISTRICT, §  
Individually and on behalf of all others similarly §  
situated, §

Plaintiff, §

v. §

SYNGENTA CROP PROTECTION, INC. and §  
GROWMARK, INC., §

Defendants. §

Cause No. 2004-L-000710

**PLAINTIFF'S FIRST INTERROGATORIES DIRECTED TO  
DEFENDANT SYNGENTA CROP PROTECTION, INC.**

Pursuant to Rule 213 of the Illinois Supreme Court Rules, Plaintiff, by its attorneys, Korein Tillery, LLC, and Baron & Budd, PC, requests Defendant Syngenta Crop Protection, Inc., to serve answers and/or objections to the following interrogatories within twenty-eight (28) days.

These interrogatories are to be answered in accordance with the following definitions and instructions, and these definitions and instructions are hereby incorporated by reference into each Interrogatory.

## DEFINITIONS

As used in these Interrogatories, the following terms shall have the following meanings:

1. "Address" means the street address, city, state, zip code, and country.
2. "Atrazine" or "atrazine-containing product(s)" means atrazine, any product (including herbicides) containing atrazine, and atrazine degradate chemicals, including but not limited to desethylatrazine, deethylatrazine, deisopropylatrazine, diaminoatrazine, diaminochlorotriazine (or desethyldeisopropylatrazine), hydroxyatrazine, desethylhydroxyatrazine, and ammeline.
3. "Date" means the exact day, month, and year, if ascertainable, or if not, a description of the temporal relationship of the occurrence for which the date is sought to the closest dates which are ascertainable.
4. "Defendants" means Dow Agrosciences, LLC, Drexel Chemical, Co., Growmark, Inc., Makhteshim-Agan of North America, Inc., Sipcam Agro USA, Inc., Syngenta Crop Protection, Inc., United Agri Products, Inc., D/B/A UAP Loveland Products, Inc., and any predecessors, divisions, subdivisions, foreign subsidiaries, foreign subsidiaries of predecessors, domestic or foreign corporate parents, and/or affiliates.
5. "Degradient(s)" or "degradate(s)" should be understood to refer to any of the chemicals into which atrazine breaks down, including deethylatrazine, deisopropylatrazine, and diaminoatrazine.
6. "Document(s)," "data," and/or "electronically stored information" is to be interpreted broadly to include but not limited to writings, records, files, correspondence, reports, memoranda, calendars, diaries, minutes, notes, research material, electronic messages, voicemail, e-mail, telephone message records or logs, computer and network activity logs, hard drives, backup data, removable computer storage media such as usb devices, hard drives, cd/dvd media, and memory storage devices, Web pages, databases, presentations, spreadsheets, software, books, ledgers and journals, orders, invoices, bills, drawings, images, photographs, video, and digital recordings. Information that serves to identify, locate, or link such material, such as file inventories, file folders, indices, and metadata, is also included in this definition.
7. "Health effects" should be understood to refer to any effect or potential effect, adverse or otherwise, to human health or the health of other living organisms.
8. "Identify" means to provide sufficient information to allow a reasonable person to locate and comprehend the subject. For example, with respect to a person, this means to provide the full name, last known address (or date of death, if applicable), job title, employer name; with respect to an entity, this means to provide the name, address, principal place of business, and state of incorporation (if applicable); with respect to a document, this means to provide the title, date, author, recipient, subject matter, description, and current custodian.

9. "Or" shall be construed either conjunctively or disjunctively to bring within the scope of these Interrogatories any information which might otherwise be construed to be outside their scope.
10. "Study" or "studies" should be understood to include all internal and external studies and all research, surveys, tests, investigations, assessments, drafts and summaries of same and all communications concerning such study or studies.
11. "Triazine" or "triazine-containing product(s)" means triazine, any product (including herbicides) containing triazine, and triazine degradient chemicals.
12. "Water resource" or "water supply" means groundwater, surface water, and/or any system for the provision to the public of water for human consumption.
13. "You," "your," "yours," or "Syngenta" means the answering defendant and any of its merged, consolidated, or acquired predecessors, divisions, subdivisions, foreign subsidiaries, foreign subsidiaries of predecessors, domestic or foreign corporate parents, and/or affiliates including, but not limited to J.R. Geigy Limited, Ciba Crop Protection, Zeneca Agrochemicals, Ciba-Geigy Limited, and Novartis Agribusiness. This definition includes present or former officers, directors, agents, representatives, employees, and all other persons acting or purporting to act on behalf of Syngenta Crop Protection, Inc., or its predecessors, subsidiaries, and/or affiliates. "Predecessors" means any business firm, whether or not incorporated, which had all or some of its assets purchased or acquired by Syngenta Crop Protection, Inc., whether by merger, consolidation, or otherwise. "Subsidiaries" further means any business firm, whether or not incorporated, which is or was in any way owned or controlled, in whole or in part, by Syngenta Crop Protection, Inc., or its predecessors. Representative means any partner, agent, employee, consultant, attorney, accountant, or anyone else acting or purporting to act for, at the direction of, or on behalf of another.

### INSTRUCTIONS

The following instructions apply to these interrogatories:

1. Each question and request shall be answered separately and fully, and each answer shall be preceded by the question to which it responds.
2. If you object to an interrogatory, please state the specific grounds for your objection and answer to the extent the interrogatory is not objectionable, as required by Rule 213. In particular, with respect to any interrogatory you contend is "ambiguous" or "vague" state the specific reasons for such objection and your understanding of the interrogatory, and answer the interrogatory as you understand it. Likewise, with respect to any interrogatory you contend is "overbroad," state the specific reason for such objection and answer to the extent you contend is reasonable.

3. Documents produced shall be organized and designated to correspond to the categories in the request or produced as they are kept in the usual course of business.
4. Answer each interrogatory and request. If your response to a specific interrogatory is "none" or "unknown," please write the word "none" or "unknown" as your response, and explain what efforts you made to investigate and respond to the interrogatory. If an interrogatory does not apply to you, please write the word "inapplicable" as your response, and explain why the interrogatory does not apply.
5. If you believe that any interrogatory or portion thereof is ambiguous or otherwise unclear, identify the language you deems to be ambiguous or unclear and explain what construction of that language you are utilizing in answering the interrogatory.
6. If you respond to any interrogatory by reference to documents, you must do so in compliance with Rule 213(e).
7. The interrogatories set forth below shall be deemed continuing insofar as to require supplemental responses in accordance with Rule 213(i) if additional information or documents sought to be identified are obtained or discovered between the time or responding to these interrogatories and the final disposition of this action.
8. If you are not in possession, custody or control of any documents described in any one or more of the following request, a written statement that you are not in possession, custody or control of any such documents and the name and address of the person who has possession, custody or control of any such documents is a sufficient response to the request. However, production of such documents shall be required if possession, custody or control of the same is in or with any of your agents, employees, servants, contractors, representatives, corporate parents, subsidiaries or affiliates.
9. If your response to any request should make reference, in whole or in part, to, or require the use of, data, information, or records contained in any computerized form, please indicate the extent to which the answers relied on such data and attached a partial or whole copy of the record.
10. If any document is withheld from production hereunder on the basis of a claim of privilege or work product protection, please provide, for each such document, a description sufficiently detailed to allow Plaintiffs to evaluate the legitimacy of your claim of privilege. Such description shall include: the title and general subject matter of the document, the date of the document, the identity of all persons who participated in creating the document, the identity of each person who signed the document or over whose name the document was issued, the identity of each addressee and recipient of the document, the number of pages which comprise the document, a description of the nature and substance of the document, its attachments, if any, its present custodian and a description of the basis for each claimed privilege or work product protection.

11. If any document which forms a part of, or the entire basis for, any response to these requests have been destroyed, disposed of, or is no longer within your control, for each such document set forth the following explanations: (a) state when it was destroyed or disposed of; (b) identify the name, title and address of the person who destroyed the documents; (c) identify the name, title and address of the person who directed that it be destroyed or disposed of; (d) detail the reasons for the destruction or disposition; (e) describe the nature of the document; (f) identify the persons who created, sent and received the document; (g) state the date the document was prepared and transmitted (if different); (h) state, in as much detail as possible, the contents of the document; and (i) if it still exists, provide a copy or draft of such document.

### INTERROGATORIES

1. Have you sold atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products to other herbicide, pesticide, or other chemical manufacturers, distributors, producers, co-ops, or wholesalers? If so, state:
  - a. The name(s) of the manufacturer(s), distributor(s), producer(s), co-op(s), and/or wholesaler(s) who purchased the product(s), and their address(es) and location(s);
  - b. The corresponding names(s) of the products(s) sold to each entity;
  - c. The chemical make-up/composition of the product(s) you sold, whether or not it/they was/were pure atrazine or triazine, and whether or not the purchaser(s) finished the product(s) into atrazine and/or triazine or an atrazine or triazine-containing product;
  - d. The corresponding quantities of product(s) sold;
  - e. The corresponding date(s) that each entity purchased the product(s);
  - f. The name(s) of the product(s) that the purchaser(s) manufactured, marketed, and/or sold as a result of their purchase from you.
  
2. Identify all atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products that you have sold. For each product:
  - a. State the name;
  - b. Indicate when it was developed, manufactured, marketed, supplied, and/or sold;
  - c. Identify the quantities you sold by year, and to whom;
  - d. Identify the geographic markets (i.e., country, state, county, city) in which it was sold (including the corresponding dates);
  - e. Identify what markets it was used in;
  - f. Identify the product for which it is intended to be used with, or mixed, blended or made into;
  - g. Identify when it was *first* developed, marketed and sold;
  - h. Identify the cost of producing it;
  - i. Identify the revenue and/or profit you made on it;
  - j. Identify who first approved of or made the decision to start making, producing, or selling it.

3. Have you purchased atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products from other herbicide, pesticide, or other chemical manufacturers, distributors, producers, co-ops, or wholesalers? If so, state:
  - a. The name(s) of the manufacturer(s), distributor(s), producer(s), co-op(s), and/or wholesaler(s) that you purchased the product(s) from, and their address(es) and location(s);
  - b. The corresponding names(s) of the products(s) purchased;
  - c. The chemical make-up/composition of the product(s) you purchased, whether or not it/they was/were pure atrazine or triazine, and whether or not you finished the product(s) into atrazine and/or triazine or an atrazine or triazine-containing product;
  - d. The corresponding quantities of product(s) purchased;
  - e. The corresponding date(s) that you purchased the product(s);
  - f. The name(s) of the product(s) that you manufactured, marketed, and/or sold as a result of your purchase.
  
4. Identify by name all alternatives to atrazine, including but not limited to mesotrione, which you have developed, are developing, have sold, are selling, or of which you have knowledge. For each such product, identify:
  - a. When it was first developed;
  - b. Who developed it;
  - c. Why it was developed;
  - d. The cost of producing/developing it;
  - e. In which markets it is used and why (e.g. because atrazine was banned in that particular market);
  - f. The dates on which you first sold it in each market, and the quantities sold, by year;
  - g. All health risks posed by exposure to this atrazine-alternative, and identify all documents relating to such risks;
  - h. The individual who first approved of or made the decision to start making or producing the product.
  
5. Describe your relationship with Jere White, the Triazine Network, the Kansas Corn Growers Association, the Kansas Grain Producers Association, and/or any other agricultural or farm associations, cooperatives, trade associations, or any other organization that advertises, endorses, supports, or in any way promotes the use of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents. For each such individual or group, please describe:
  - a. Describe the relationship in detail and identify what he/they was/were hired or employed to do for you, if applicable;
  - b. What he/they was/were asked to do when he/they attend meetings or gatherings pertaining to the present litigation;
  - c. What he/they was/were paid, including any transfer of value from you to him/them;
  - d. What correspondence you had with him/them regarding services;
  - e. What contracts or agreements exist/existed between you/them;
  - f. If you have ever hired or employed other individuals or groups in a similar manner, describe your relationship with them and answer the questions above for each such

entity.

6. Are you aware of other manufacturers that have produced or are producing atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products? If so, identify them by name, including addresses and their share of the atrazine market for each year they produced atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products.
7. Describe the first ten instances that you know of where atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products contaminated water resources. For each instance, please explain what water resource was contaminated and when, who notified you about the contamination, who, specifically, at Syngenta was notified, how you reacted, what you did, how you followed up, and how the incident impacted you.
8. Identify all persons, including addresses, with knowledge of facts relevant to the claims or defenses asserted by Plaintiff or Defendants in this action, and provide a summary of the relevant facts of which each person has knowledge. Please be sure to include those who you employed or hired with responsibility relating to:
  - a. Determining the health effects of exposure to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products;
  - b. Investigating the contamination of water resources by atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products;
  - c. Considering, developing, adopting, circulating, and/or providing final approval for any warnings related to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates.
9. Describe your document retention policy, as well as that of your merged, consolidated, or acquired predecessors. In your response, please discuss where documents pertaining to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates are located, who was/is responsible for maintaining these documents, and whether any documents pertaining to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates have been destroyed.
10. Identify all persons employed or hired by you with any responsibility for or involvement in communicating with domestic or foreign governmental agencies, herbicide industry associations, herbicide manufacturers, customers, the public, or other persons or entities regarding atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates, their use, and/or their regulation and provide a summary of all such communications. In your response, please be sure to include all those who met with the United States Environmental Protection Agency ("EPA") regarding the Natural Resource Defense Counsel's ("NRDC") lawsuit against them regarding atrazine and those responsible for reporting on your behalf to the EPA for issues related to the Federal

Insecticide, Fungicide, and Rodenticide Act and/or the Toxic Substances Control Act. For each such communication, identify:

- a. The person who participated in the communication, and their address;
- b. The recipient of the communication and any organizations of which they were a member;
- c. All minutes or notes taken at the meeting or communication;
- d. All documents produced or provided by the persons you hired or employed in connection with the meeting or communication.

11. Describe any other litigation or administrative proceeding that you are or have been involved in related to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates? For each such instance:

- a. Identify the proceeding by name, caption, and date, as well as all documents relating thereto;
- b. Identify all persons, including addresses, employed or hired by you who have provided testimony (by deposition, hearing, affidavit, trial, or other sworn manner) in each respective matter;
- c. Explain the subject matter, allegations, and/or basis for the proceeding;
- d. Identify any copies of any depositions, statements, or other documents related to these proceedings.

12. Describe any inquiries or complaints regarding the health effects of or the contamination of water resources by atrazine, atrazine-containing products, and/or constituents or degradates of such products by consumers, employees, contractors, downstream users, or other persons or entities? For each such complaint, describe:

- a. Who made the complaint/inquiry, and when they made it;
- b. To whom the complaint/inquiry was directed;
- c. The nature of each complaint/inquiry;
- d. What your response was to the complaint/inquiry; and
- e. How you were impacted by the complaint/inquiry.

13. Identify each and every warning or communication of any type including but not limited to oral and written statements and/or written material that you have had with, have caused others to have with, provided to, or caused to be provided to the public, to a water provider, or to a governmental entity regarding contamination of water resources and/or potential health effects of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products or regarding potential or current litigation relating to these materials. For each such warning:

- a. Identify the person or persons responsible for having drafted or issued the information, statement, or written material, and any other persons involved in or responsible for conveying the information;
- b. State the date such information was first issued or distributed and the inclusive period during which it was used;
- c. Identify all documents reflecting, referring, or relating to such information, statement, or written material;



- d. Identify each and every entity or individual to whom you issued or distributed such warning, caution or advisory.
14. Describe any relationship that you have or have had with any laboratories or research groups related to studies of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products. For each such laboratory or research group, please describe:
    - a. The name and address of the laboratory or group;
    - b. The nature of the relationship, contract, agreement, understanding, or work efforts existing between you and them, including what you specifically asked them to do, how much you paid them, and when;
    - c. Whether you have any ownership interest in the laboratory or group;
    - d. The studies that they performed for you, the results, and when you received the results;
    - e. What correspondence you had with him/them regarding services;
    - f. What governmental entity you reported the results to and when;
    - g. Other joint efforts, long-term contracts or relationships, exclusivity agreements, and/or other contracts that you have entered into with them.
  15. Have you placed or caused to be placed advertisements referencing atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products in any magazines, newspapers, periodicals, trade journals, catalogues, directories, brochures, circulars, or similar written or printed material? If so:
    - a. Identify each advertisement, the date of such advertisement, the publication or other document in which such advertisement appeared, and the area of distribution of the publication or other document in which such advertisement appeared;
    - b. State the exact wording of each advertisement.
  16. Identify all national and international factories, plants, or facilities where you manufacture or have manufactured atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products. For each facility:
    - a. Identify its name, location, and physical address;
    - b. Describe and list what products you manufacture(d) there by name, quantity, chemical composition/make-up, and year;
    - c. Describe and list who you sold the products to, and the purchaser's physical address and location;
    - d. Identify when it first began manufacturing the products and when (if applicable) it ceased manufacturing.
  17. In all regions, states, countries, or other areas where atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products have been banned, restricted, or are no longer used, describe the product that you are selling for use on the same crops that the banned, restricted, or no longer used product was intended for. For each such product:
    - a. State the name;

- b. Indicate when it was developed, manufactured, marketed, supplied, and/or sold;
  - c. Identify the quantities you sold by year, and to whom;
  - d. Identify the geographic markets (i.e., country, state, county, city) in which it was sold (including the corresponding dates);
  - e. Identify what markets it was used in;
  - f. Identify the product for which it is intended to be used with, or mixed, blended or made into;
  - g. Identify when it was *first* developed, marketed, and sold;
  - h. Identify the cost of producing it;
  - i. Identify the revenue and/or profit you made on it;
  - j. Identify who first approved of or made the decision to start making, producing, or selling it.
18. Before you *first made* atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products, did you perform or cause someone to perform any studies, surveys, reports, evaluations or other investigations of such products, including but not limited to studies regarding their environmental and/or health effects? If so:
- a. Describe each and every study, survey, report, evaluation, and/or investigation performed on your behalf, including the title, person(s) who conducted the study or testing, the date conducted, the issue(s) studied or tested, and what you did with the results;
  - b. Identify all documents related to your decision to perform or cause someone to perform each study, survey, report, evaluation, and/or investigation of the products;
  - c. Identify all documents related to any analysis or consideration of the results of the study, survey, report, evaluation, and/or investigation of the products.
19. Identify each and every trade association, trade organization, industry group, committee, and/or lobbying group that you have been a member of at any time relating to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products. For each such organization:
- a. Identify the aspects of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products that the group addressed;
  - b. Identify the person employed or hired by you who was a member of or representative to the group;
  - c. Indicate the dates that you have been a member;
  - d. Indicate any transfer of money, funding, donation, or other form of value between you and the group, and indicate why such a transfer was made.
20. Have you attempted to calculate or analyze your share of the market of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products, or the share of the market of other manufacturers? If so, list your share of the market, and/or the share of the market for other manufacturers, per year known for atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products.

21. Describe what steps you have taken to prevent atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products from contaminating water resources, specify the time period in which such steps were taken, and specify who was involved in each stage of the process.
22. Identify each insurance policy in which you are a named insured and which you claim covers you for the events alleged against you in this action. Include in your answer the insurance carriers, policy numbers, types of policies, policy limits, policy periods, the name of all insureds and additional insureds under each policy, and the amount of coverage provided by each policy.
23. Provide your corporate history, including, at a minimum:
  - a. The date of formation or first incorporation;
  - b. The state in you were formed or first incorporated;
  - c. Your present state of incorporation (if different from initial incorporation);
  - d. Any corporate or business name changes;
  - e. Any purchases by or mergers with you of any other business or corporation, and the dates these occurred;
  - f. The states and countries in which you are authorized to do business;
  - g. The name and address of all parent and subsidiary corporations; and
  - h. The corporate relationship among all of your parent and subsidiary corporations.
24. Have you or have you had a research and development department or division that performs or has performed work relating to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products? If so:
  - a. State the name of each such department or division and the date the department or division was created;
  - b. Identify each person involved with creative input or control over the research and development pertaining to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products since you began making such products.
25. From the year in which you first began making atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products to the present, identify each person who has held the following positions in your company or its predecessors, and state the inclusive dates during which each person held the position:
  - a. Board of Directors member;
  - b. Chief Executive Officer;
  - c. Chief Financial Officer;
  - d. Director of Marketing, or equivalent, who was responsible for marketing atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products throughout the United States;
  - e. Director of Marketing, or equivalent, who was responsible for marketing atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products throughout Illinois;

- f. Toxicologist, or equivalent, who was responsible for assessing the health risks associated with atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products;
  - g. Endocrinologist, or equivalent, who was responsible for assessing the health risks associated with atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products;
  - h. Environmental Health and Safety Manager, or equivalent, who was responsible for environmental, health, and safety issues including but limited to water contamination related to atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products.
26. Identify by name, job description, and current (or last known) business address each person who has supplied any answers or information for, or assisted in locating any documents or tangible things for your answers to these interrogatories and/or responses to the accompanying requests for production.
27. Describe all studies, surveys, reports, or other investigations done by you or at your request, direction, or expense (in whole or in part), or of which you are aware relating to the health effects of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products. In your response, please include the name(s) and address(es) of the author(s)/researcher(s) responsible for each study, the date(s) of each study, the purpose(s) of each study, your reaction to the finding(s) of each study, and what governmental entity(ies) you reported the finding(s) to, and when.
28. Describe all studies, surveys, reports, or other investigations done by you, at your request, direction, or expense (in whole or in part), or of which you are aware relating atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents or degradates of such products contaminating water resources. In your response, please include the name(s) and address(es) of the author(s)/researcher(s) responsible for each study, the date(s) of each study, the purpose(s) of each study, your reaction to the finding(s) of each study, and what governmental entity(ies) you reported the finding(s) to, and when.
29. Describe all studies, surveys, reports, or other investigations done by you, at your request, direction, or expense (in whole or in part), or of which you are aware discussing the benefits, advantages, and/or disadvantages of atrazine, atrazine-containing products, triazines, triazine-containing products, and/or constituents of such products as compared to other products. In your response, please include the name(s) and address(es) of the author(s)/researcher(s) responsible for each study, the date(s) of each study, the purpose(s) of each study, your reaction to the finding(s) of each study, and what governmental entity(ies) you reported the finding(s) to, and when.

Dated: 5/20/09

Respectfully submitted,

BY: Christie Deaton

**KOREIN TILLERY, LLC**

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- and -

**BARON & BUDD, PC**

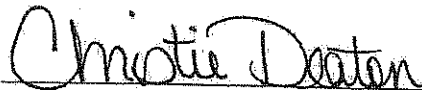
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CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the Plaintiff's First Interrogatories Directed to Defendant Syngenta Crop Protection, Inc. was served upon the attorneys of record for the defendants in this cause by enclosing said copy in an envelope addressed to said attorney at his/her address as disclosed by the pleadings on file in this cause and by depositing said envelope in a U.S. Post Office mailbox at 5:00 p.m. on this 20<sup>th</sup> day of May, 2009.

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