

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN RE:

VITAMIN ANTITRUST LITIGATION

Misc. No. 99-197 (TFH)
MDL No. 1285

FILED

APR 05 2002

NANCY MAYER WHITTINGTON CLERK
U.S. DISTRICT COURT

This Document Relates to:

Blue Seal Feeds, Inc., et al. v. BASF AG, et al.,
Civil Action No. 99-CV-3226 (C.D. Ill.)

Docket No. 99-2683 (TFH)

Tyson Foods, Inc., et al. v. BASF AG, et al., Civil
Action No. 99-5134 (W.D. Ark.)

Docket No. 99-2681 (TFH)

Marshall Durbin Farms, Inc., et al. v. BASF AG, et
al., Civil Action No. 99-CV 0152 (C.D. Ga.)

Docket No. 99-2682 (TFH)

Countrymark Cooperative, Inc. v. BASF AG, et al.,
Civil Action No. 99-1941 (S.D. Ind.)

Docket No. 00-234 (TFH)

Cactus Operating, Ltd., et al. v. BASF AG, et al.,
Civil Action No. 99 288j (N.D. Tex.)

Docket No. 99-2684 (TFH)

Southern States Cooperative, Inc., et al. v. BASF
AG, et al., Civil Action No. 99-00070 (W.D. Va.)

Docket No. 99-2685 (TFH)

**STIPULATION CONCERNING RESPONSES
TO PLAINTIFFS' AMENDED COMPLAINTS**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, that the answer of each defendant joining in this stipulation, which was filed or shall be filed pursuant to any pre-existing agreement postponing any defendant's response obligation, in response to the First Amended Complaint in Blue Seal Feeds, Inc. et al. v. BASF AG, et al. ("Blue Seal First Amended Complaint") shall, at each defendant's option, be deemed filed and responsive to the following complaints, originally filed by the plaintiffs in those cases on or about July 2, 2001 and as ultimately substituted on March 4, 2002:

7057

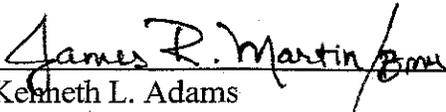
1. Second Amended Complaint in Blue Seal Feeds, Inc., et al. v. BASF AG, et al.;
2. First Amended Complaint in Tyson Foods, Inc., et al. v. BASF AG, et al.;
3. First Amended Complaint in Marshall Durbin Farms, Inc., et al. v. BASF AG, et al.;
4. First Amended Complaint in Countrymark Cooperative, Inc. v. BASF AG, et al.;
5. First Amended Complaint in Cactus Operating, Ltd., et al v. BASF AG, et al.;
- and
6. First Amended Complaint in Southern States Cooperative, Inc., et al v. BASF AG, et al.

On or before April 8, 2002, each defendant may, in lieu of having its answer to the Blue Seal First Amended Complaint be deemed filed and responsive to the above complaints, file an answer to the above complaints that incorporates that defendant's response to the Blue Seal Amended Complaint and contains additional answers, defenses, or other responses as appropriate.

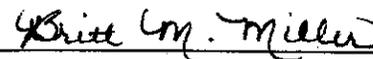
By signing and joining this stipulation, no defendant waives any defense previously asserted by that defendant and all such defenses are hereby expressly preserved.

Date: April 4, 2002

Respectfully submitted,

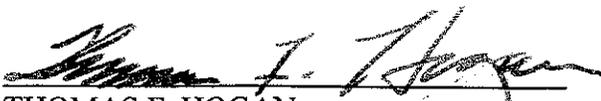

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Counsel for BASF Corporation and, for purposes of this stipulation, on behalf of Defendants BASF AG, Bioproducts Incorporated, Chinook Group, Inc., ConAgra, Inc., Daiichi Fine Chemicals, Inc., Daiichi Pharmaceutical Co., Ltd., Daiichi Pharmaceutical Corporation, Degussa AG, Degussa Corporation, DCV, Inc., DuCoa, L.P., E.I. du Pont de Nemours & Company, F. Hoffmann-La Roche Ltd, Hoffmann-La Roche Inc., Roche Vitamins Inc., Lonza AG, Lonza Inc., Mitsui & Co. (U.S.A.), Inc., Mitsui & Co., Ltd., Nepera, Inc., Reilly Industries, Inc., Reilly Chemicals, SA, Rhone-Poulenc S.A., Rhone-Poulenc Animal Nutrition, Inc., Rhone-Poulenc, Inc., Takeda Chemical Industries, Ltd., Takeda Vitamin & Food USA, Inc., Tanabe Seiyaku Co., Ltd., Tanabe U.S.A., Inc., UCB, Inc., UCB S.A., UCB Chemicals Corporation

SO ORDERED:


THOMAS F. HOGAN
UNITED STATES DISTRICT JUDGE

DATE: April 5, 2002